

8.3.6 Funding Source: Local Funds

Local funds contributed to the program from local public or private governments, agencies, or organizations can be used for the required match. Local fund expenditures must follow rules of the program for which they were contributed.

8.3.7 Funding Source: Voluntary Contributions

The Older Americans Act emphasizes regard for the dignity of older persons by requiring that opportunities are provided to older persons to participate not only in the planning and administering of aging programs, but also in contributing toward the cost of services. Therefore, each provider of Title-III services must provide each older person an opportunity to voluntarily contribute to the cost of service. These contributions will be used to expand meal services, maintain the service level, support access to such services (including transportation), provide outreach, and provide nutrition education and counseling.

Contributions collected at individual dining centers and home-delivered meal participant homes must be returned to the county or tribal aging unit to be used in the planning and budgeting for the nutrition program's entire service area. Procedures must be established to safeguard and account for all contributions.

Programs will, with the advice and consent of nutrition advisory groups and/or the commission on aging, choose one of the following options for accepting voluntary contributions:

- Set a suggested contribution.
- Set a suggested range of contribution levels.
- Choose not to suggest a contribution amount and ask participants to contribute what they are able.

To maintain the intent of the Older Americans Act regarding voluntary contributions, programs must:

- Provide each older person with an opportunity to voluntarily contribute to the cost of the service.
- Ensure a system is in place at each dining center to collect contributions at the point of service (with the exception of dining centers approved to accept vouchers, see [Section]).
- Protect the privacy of each older person with respect to his or her contributions.
- Establish procedures to safeguard and account for all contributions.

In addition, programs cannot:

- Deny an eligible participant a service because the person cannot or will not contribute to the cost of the service.
- Use self-identified means tests.
- Require a contribution or in any way imply that one is required to participate.

8.3.7.1 Contribution Signs, Brochures, and Letters

Each dining center must have a sign (and in the case of home-delivered meals a brochure or letter) which includes the suggested contribution (if applicable), total meal cost, a statement about the source of funds used for programs, and the stipulation that no eligible participant will be denied a meal based on ability to contribute toward the cost of the meal. The signs, brochures or letters should be in

large print.

Contribution letters are one method of collecting voluntary contributions from participants. The OAA does not prohibit the use of contribution letters as long as:

- Eligible participants are clearly informed that there is no obligation to contribute;
- Procedures exist to ensure the confidentiality of each participant's contribution or lack of contribution;
- Procedures exist to safeguard and account for all contributions;
- All contributions are used to expand the service for which the contributions were given; and
- Participants are also provided the opportunity to contribute on-site at the point of service.

If contribution letters are used for the senior dining or home-delivered meal program, all letters must include the following unaltered sentences:

We are required to provide you the opportunity to contribute to the cost of this service. The actual cost to our agency to provide this meal is \$[Per Meal Cost]/meal. Contributions to help offset the cost of meals are essential to maintaining nutrition services for our community's older adults. Contributions from participants, their families, and others directly fund the meals we provide and are combined with federal, state, and local funds to provide this service. The suggested contribution is \$[Suggested Contribution]/meal. Our records show that you received [Number of Meals], which amounts to a total suggested contribution of \$[Total Suggested Contribution]. Please contribute what your budget allows. You will not be denied a meal if you are unable to contribute. We are committed to protecting the privacy of your contributions.

8.3.7.2 Non-Differentiation

Every attempt should be made to maintain and protect each participant's dignity. Accordingly, contributions must be handled in a manner that does not publicly display each participant's contribution amount. Strict confidentiality is required.

8.3.7.3 Gift Certificates

Nutrition programs can sell gift certificates for meals. As long as the participant using the gift certificate is registered and eligible for service as described in Section X of this chapter, the certificate can be sold on a voluntary contribution basis. Gift certificates for use by non-eligible individuals must be sold for the total meal cost.

8.3.7.4 Contributions as Program Income

Contributions made by or on behalf of older adults are considered program income. Contributions from local civic groups, businesses, and members of the community are also considered program income. Unless designated to be used for a specific purpose by the contributor, all contributions will be used to fund the nutrition program as a whole. Program income will be planned for and spent by the county/tribal aging unit on behalf the nutrition program from which it was generated (i.e. participant contributions for congregate meals will be spent within the congregate meal program). Program income must be spent in the calendar year in which it is obtained,

or within the first 60 days of the following calendar year. Some program income may be put into a trust to be spent later for a specific purpose, but approval must be obtained by the AAA in advance. Policies governing program income are found in **Chapter 12** of this manual.

8.3.7.5 Management of Contributions by Staff

Procedures must be established for the return of cash contributions from the dining center area and home-delivered meal participant homes to the aging unit, such as establishing a bank account from which the aging unit can draw a check. Procedures will address the following:

- Two people must count contributions individually and compare total amounts to ensure accuracy.
- All participant contributions will be recorded immediately and a log of daily contributions will be maintained. This record must agree with the bank deposit record.

All cash contributions must be deposited regularly. In areas without banks, money orders purchased from post offices may be used.

- Records of deposit must be obtained from the bank. Bank statements will be reconciled to receipts and deposit records.
- Records of contributions will be kept on file along with other agency records for a period of three years.
- Other safeguards include keeping contributions in a locked box or a safe until deposited, comparing deposit slips with receipts, and bonding of employees handling cash.

8.3.7.7 Issuing Change for Cash Contributions

If a program participant requests that change be made for a cash contribution provided at a dining center, the dining center manager will exchange smaller bills for the bill provided and allow the participant to contribute the amount desired in confidentially. For example, if the participant gives the dining center manager a \$20 bill, the dining center manager will give the participant \$20 in various bills. *The dining center manager will not remove the suggested contribution amount and give the participant the difference.*

If change is not available on-site, participants cannot be denied a meal. Instead, the dining center manager could:

- Provide a self-addressed stamped envelope to the participant with instructions for mailing contributions to the aging office.
- Offer the participant a mailed donation letter .
- Remind the participant that contributions can be made for more than one (1) day at a time. For example, participants could make a larger contribution that day to cover several days of meals.

Nutrition directors and dining center managers are responsible for reminding other staff and volunteers that contributions are voluntary and confidential and that no eligible participant will be denied a meal based on inability to donate.

8.4.7 Eligibility for Services

Under the Older Americans Act, nutrition programs may not deny service based on United States citizenship or residency status. OAA services should be targeted to older adults who are in greatest social and economic need, with no consideration of their citizenship or residency status. Residency within a particular county or tribe is not required for participation in congregate meals. A nutrition program will not deny meals to senior dining participants who reside in counties or tribes outside of its service area, as long as they meet other eligibility requirements. Such meals provided to eligible individuals can be claimed for NSIP by the program providing the meal.

A program may have local policies in place that require residency within the county or tribal service area for home-delivered meal participants. Nutrition programs may provide homedelivered meal services to individuals who reside outside of the county or tribe by entering into an agreement with the county or tribe of residence. The county or tribe that would claim the meal for NSIP would be determined within the agreement (See Section **8.4.17.6 - Agreements Between Nutrition Programs**).

8.4.7.1 Eligibility for Senior Dining (Congregate) Meals

Individuals eligible to receive a meal on a voluntary contribution basis at a senior dining center are:

- Aged 60 or older, A spouse or domestic partner who attends the dining center with his or her spouse or domestic partner who is aged 60 or older,
- An adult with a disability, younger than age 60, who resides in a housing facility occupied primarily by older individuals at which congregate nutrition services are provided is eligible to receive meals at the facility in which they reside, or
- An adult with a disability, younger than age 60, who resides with an eligible older individual participating in the program.

All nutrition program staff, guests and volunteers who meet the criteria above are eligible program participants. These individuals will be given the opportunity to contribute to the cost of the meal in accordance with usual contribution procedures.

Eligibility criteria for participants of the senior dining program will be available in writing to all potential participants, referral agencies, physicians, public and private health organizations and institutions, and the general public.

Meals served to the above eligible participants will be included in the NSIP meal count.

8.4.7.2 Eligibility for Home-Delivered Meals (HDMs)

Any of the following individuals are eligible to receive home-delivered meals:

- A person aged 60 or older who is essentially homebound by reason of illness, disability, or isolation, if an assessment concludes that participation is in the individual's best interest,
- A spouse or domestic partner of a person eligible for a HDM as described above, regardless of age or condition, if an assessment concludes that participation is in the best interest of the homebound older individual, or
- An adult with a disability who resides with an eligible older individual participating in the program, if an assessment concludes that participation is in the best interest of the

eligible participant.

Meals served to the above eligible participants will be included in the NSIP meal count. Eligibility criteria for participants of the home-delivered meal program will be available in writing to participants, potential referral agencies, physicians, public and private health organizations and institutions and the general public.

Determination of need is based on the following:

- The individual is unable to leave his or her home under normal circumstances. Flexibility is allowed for medical appointments and occasional personal reasons such as hair care or church services that are important to the individual's quality of life.
- The person is unable to participate in the congregate meals program because of physical or emotional problems.
- There is no spouse, domestic partner, or other adult living in the same house or building who is both willing and able to prepare all meals.
- The individual is unable, either physically or emotionally, to obtain food and prepare adequate meals.
- Other criteria established by the nutrition program and approved by the AAA.

Nutrition program staff will make every effort to provide meals to an older person who is eligible and has been determined to need the service.

Authorization from a physician or other certified medical authority is not required for an individual to be eligible for home-delivered meals. A home-delivered meal assessment, on the other hand, is required in order to determine eligibility for home-delivered meals using Title III Older American's Act funds (See Section 8.4.7.2.1). Circumstances that do require authorization from a certified medical authority include accommodations of special dietary requests to provide texture-modified meals (ground meat, thickened liquids, pureed foods, etc.) or therapeutic meals (diabetic, renal, low calorie, etc.) (See Section X).

Nutrition programs cannot require home-delivered meal recipients to receive meals at a minimum frequency, for example five days per week, in order to participate.