Alliance for Aging, Inc.
Area Agency on Aging for
Miami-Dade & Monroe Counties

NUTRITION TRAINING  September 11, 2014
WELCOME & INTRODUCTIONS
Section One

- Provider Responsibilities
- Subcontracts for Services
- Data Collection and Reporting
- Surplus/Deficit
Provider Responsibilities

► Read and adhere to current DOEA Programs and Services Handbook, specifically Chapter 4. (RV 2014)

► Make efforts to improve and expand services.

► **Resource and Referral:**
  - Arrange and coordinate services between agencies
  - Have cooperative arrangements with community mental health provider agencies
  - Make efforts to refer clients to another agency when they cannot meet the needs of the client.
    - **These efforts shall be made and documented.**

► Be responsive to Adult Protective Services (APS) cases
Provider Responsibilities

- Establish project advisory council made up of representatives from each congregate site or a site council at each site. (made up of at least 51% clients and meet at least 2 times per year) (Chapter 4, page 4-114)
- Submit required quarterly nutrition paperwork
- Submit semi-annual outreach reports
- Keep client files with required documentation

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• Form 217 is required for clients that receive cold or frozen C2 meals
Subcontracts for Services

- Providers may subcontract with another agency to deliver one or more service(s).

- Providers must have procurement policies that comply with provisions of 45 CFR 74 and 45 CFR 92 when addressing competition in procurement transactions to ensure that all interested agencies are offered a fair opportunity to submit responsive proposals.

- The intent to subcontract services must be specified on the service provider application. (The subcontractor, the service, the amount of funds, the units and the subcontractor monitoring tool).

- Providers must monitor subcontractor (caterer) at least once per year fiscally, administratively and programmatically to ensure contractual compliance, fiscal accountability, programmatic performance and compliance with applicable state and federal laws and regulations. Monitoring reports must be submitted to the AAA.

- Subcontracts with profit-making organizations require prior approval from the AAA before contract execution.
Data Collection and Reporting

- Providers must have procedures to collect information and compile reports
- Providers must have adequate staff to ensure CIRTS data integrity
- Providers must retain records in detail to record services provided, expenditures made, and clients served
- Fiscal Reports must be submitted timely, accurately and must be verifiable. OAA reports are due by the 5th of every month
- Providers must adhere to the AAA’s CIRTS policies and procedures to ensure CIRTS data accuracy
Surplus-Deficit

- Providers are responsible for ensuring optimal level of service delivery and must ensure that levels of service delivery are reasonable and uniform throughout the funding year for 100% expenditure of funds.

- Providers must spend funding allocated by service. Providers do not have modified spending or title transfers in OAA. Exceptions can be made pursuant to the AAA’s modified spending policy.

- Providers must wait list all registered services in CIRTS.

- Providers shall track actual over/under service utilization on a monthly basis. Copy of the surplus/deficit form must be submitted with the monthly request for payment. An electronic copy must also be sent to the contract manager by the 5th of every month.

- OAA Providers providing registered services must report the monthly number of client contacts in the monthly surplus/deficit report (column K) as per their OAA outsourced function requirements.
Section Two

- Unusual Incidents, Complaints & Grievances
- Input & Satisfaction
- Staff and Volunteer Training
- Responsibilities of the Dietician
- Menus
- Menu Substitutions
Unusual incidents, complaints & grievances

► Providers must have separate unusual incident, complaints and grievance policy and procedures

► Provider must maintain files and logs of grievances and complaints (separately).

► Log must reflect date, program, client name, CIRTS ID, nature of complaint & resolution.

► The AAA must be notified within 48 hours of any unusual incident that may have an adverse affect on services.
Input and Satisfaction

► Advisory Council or Site Council meetings
  (minimum 2 per year; composed of representatives from each CNML site).

► Satisfaction surveys are required. Providers must periodically and systematically survey a sample of older persons to objectively determine the level of client satisfaction. The Provider must adhere to the survey frequency as written in its service application. In order to improve services, Providers are required to conduct follow-up when dissatisfaction with services is reported.

► Other methods can include:
  ● Suggestion boxes
  ● Client interviews
Staff and Volunteer Training

- Providers must have a Certified Food Protection Manager responsible for the storage, display, and serving of food for meal sites. This individual does not have to be present at all times unless the provider prepares its own meals (self preparation as opposed to catered).

- SERVSAFE certification is also accepted in lieu of the Food Protection certification unless you are preparing your own meals.

- Any new staff or volunteer having food contact must have a general orientation to safe food handling, prevention of food borne illnesses, and sanitation practices before assuming food service assignments.

- All food service staff and volunteers must receive annual training on the prevention of food borne illness.
Staff and Volunteer Training

- Ongoing training should be conducted, as needed, to ensure program compliance and understanding of the requirements.

- It is imperative that site managers be trained on all program requirements, including Substitution policy & log, temperature logs, NPCRs, etc.

- Documentation of all training must be retained for monitoring purposes. Must include topic, date, presenter & presenter’s title and attendees printed name and signature.
Responsibilities of the Dietician

- Participate in developing menus with input from advisory council
- Ensure all menus meet nutritional criteria as required by DOEA
- Approve all menus
- Monitor all congregate meal sites, at least annually, using the NPCR tool
- Participate in development and review of food service contract (caterer’s contract)
- Participate in developing the monthly nutrition education
- Provide staff and volunteer training in areas of nutrition, food service management and food safety
- Participate in the development of client satisfaction tools, review and assessment of results
- Providing nutrition counseling for clients (for both congregate and home-delivered clients at nutritional risk)
Responsibilities of the Dietician

- The dietician’s contractual agreement must include all of the above responsibilities.

- The dietician’s contract must be signed and dated by both parties. It must also indicate the duration of the contract and rate of reimbursement.

- When several dieticians are working under one corporation, the contractual agreement must reference the name of the corporation. A copy of each dietician’s license must be obtained for monitoring purposes.
Menus

- Menus must be submitted to the AAA for review and approval at least 6 calendar weeks prior to implementation (attribution & nutrient analysis must also be submitted).

- Attestation statements must address any observations identified by the Provider’s dietitian.

- Menus must be no less than 4 weeks in rotation, maximum 6 months cycle.

- Menus must be posted at each congregate meal site (14 font or larger)

- Menu must include:
  - Name and title of person who developed it
  - Name and title of RD approving it
  - RD’s signature on every page
  - Effective dates for the menu
  - Menu type (Hot, Frozen, Shelf Stable, Holiday or Special Events)
MENU SUBSTITUTIONS

- Provider must develop a menu substitution policy and procedure to include a pre-approved substitution list. These procedures must be developed and approved by the dietician.

- Menu substitution P&P must be available for site manager’s use. A copy should also be shared with the caterer.

- Substitutions must be kept to a minimum (5 or less).

- Substitutions must be from the same food group and provide equivalent value. It is encouraged that they be from the pre-approved substitution list.

- Provider must keep a monthly substitution log which must include: date, the original menu item, the substitution made, the reason for the substitution, the signature of the person authorizing the substitution and how the issue was addressed.

- Refer to the AAA’s menu substitution Policy; Revised September 2014
Section Three

- Nutrition Service Incentive Program (NSIP)
- Contributions
- Nutrition Education
- Nutrition Program Compliance Review Tool (NPCR)
- Annual Caterer Monitoring
Nutrition Service Incentive Program (NSIP)

- Reference: 2014 DOEA Programs and Services Handbook
  - Chapter 4, pages 148-149
- NSIP allows programs to increase the number and/or the quality of meals served.
- Only Title III nutrition program providers can receive funds.
- Contract year is from October 1 through September 30.
- Funds must be used to purchase U.S. grown foods.
- Funds must be used to provide meals to eligible clients.
- Nutrition program shall report meal counts of eligible meals to the AAA.
  - Non DOEA meals are reported as NDP in CIRTS.
NSIP Requirements

 Providers must develop a system for documenting meals included in the NSIP meal count.

- Obtain a signature from each client on a daily or weekly congregate meal service log or on a daily or weekly home delivered meal route sheet; or

- Obtain a signature from the congregate meal site manager/coordinator or the home delivered meal deliverer on a daily or weekly congregate meal service log or on a daily or weekly home delivered meal route sheet. The meal route sheet must include the client’s name, address and number of meals served.
NSIP Requirements

- Meals must meet the following conditions:
  - DOEA menu development standards
  - Meals shall be served to an eligible client
  - Meals were provided by an OAA Title III provider
  - Meal is served by a nutrition provider who is under the management and audit authority of the AAA and DOEA.

- Meals served to clients in Community Care for the Elderly (CCE), or other means tested program may not be included in the NSIP count.
Contributions

► Reference: 2014 DOEA Programs and Services Handbook
  ● Chapter 4, pages 157-158

► Clients should be given an opportunity to voluntarily and confidentially contribute to the cost of the meals.

► Providers must develop a policy and procedure on client contributions.
  ● The policy should establish procedures to protect the privacy and confidentiality of each client’s donations.
  ● Procedures must be established by each provider in accordance with DOEA guidelines for handling funds collected to insure against loss, mishandling or theft.

► All contributions shall be used to increase the number of meals, facilitate access to nutrition services, and to provide nutrition counseling and nutrition education.
Contributions

- Nutrition providers may develop suggested contribution schedules, taking into consideration the income ranges of eligible individuals in the community. Providers are not required to advertise the full cost of the meal.

- Each client shall determine the amount of his/her contribution.

- Suggested contribution schedules shall not be used as a means test for determining eligibility for services.

- No eligible individuals shall be denied a meal because of failure to contribute.
Nutrition Education

► Reference: 2014 DOEA Programs and Services Handbook
  ▪ Chapter 4, page 163

► Nutrition education shall be planned and directed by a qualified dietitian, cooperative extension agents or trained meal site or wellness coordinators, under the direction of the qualified dietitian.

► Nutrition education activities may be provided by a qualified dietitian, cooperative extension agents or trained meal site or wellness coordinators, under the direction of the qualified dietitian.

► Nutrition education is provided at each site and distributed to each home delivered meal client a minimum of once a month.
Nutrition Education

- The provider’s qualified dietitian shall develop a written annual nutrition education plan that documents subject matter, presenters and materials to be used.

- Congregate sessions shall be a minimum of 15 minutes in length.

- Each nutrition service provider shall maintain written documentation, for monitoring purposes that include the date of the presentation, name and title of presenter, lesson plan or curriculum, and number of persons in attendance. *Attendance log and any materials provided must be maintained.*

- The documentation requirement for materials delivered to homebound clients shall include the date of distribution, copy of distributed material, and number of clients receiving the information. *A copy of the driver’s delivery roster will meet this requirement.*
Nutrition Program Compliance Review Form/tool

► The Nutrition Program Compliance Review Form (NPCR) must be completed quarterly for each meal site.
  • One time by the nutrition consultant/program dietician
  • One time by the nutrition service provider’s administrative staff
  • Two times per year by the meal site manager or designee.

► The provider must review each form for possible substitutions and/or temperature issues. Any compliance issues and the follow-up and resolution must be documented/acknowledged in the comments section.

► The reviewer must ensure to complete each item applicable to his/her position.

► The reviewer must sign the form (also print name) and indicate his/her position/title.
Annual Caterer Monitoring

- Nutrition providers must conduct an annual monitoring of their contracted caterers.

- The NPCR form can and should be used to evaluate caterers (section Q).

- Section “Q” (other) on the NPCR form instructs the inspector to review and attach any local, state or federal inspections that was conducted on the caterer. By doing this, the Provider should be able to review all inspections, and decrease redundant inspection practices.

- If the inspector notes areas that haven't been addressed, or if the inspector feels the a specific area needs more attention, then the inspector is entitled to pursue that area.
Annual Caterer Monitoring

- A skilled inspector should be conducting the caterer's annual inspection. (Other applicable sections include: F, G, H, & I)

- The individual conducting the food service vendor monitoring shall have demonstrated knowledge of sanitation, food handling, food preparation, and food storage principles, and preferably be a Certificated Food Protection Manager or a qualified dietician.

- Copy of the current local fire department inspection report must also be reviewed. All items that were cited by the fire department must be corrected prior to the start of the program.
Section Four

- Meal Temperature Documentation Requirements
- Daily Temperature Log
- Background Screenings
- Nutrition Documentation Log
Meal Temperature Requirements

- Temperature checks shall be taken, and documented, on a daily basis.

- The Nutrition provider must have a QA policy in place to capture that the caterer is adhering to temperature requirements (both C1 and C2).

- Documentation must include at a minimum:
  - 1. Time menu items delivered;
  - 2. Each menu item and serving size;
  - 3. Temperature(s) of each potentially hazardous menu items must be taken:
    - When the food is received by the nutrition site; and
    - If there is more than 30 minutes between when the food is received at the meal site and when it is served, then a time and a temperature of each food item must be documented again at the time the meal is served.
Meal Temperature Requirements

- It is strongly encouraged that Providers implement the temperature log form provided by the AAA. The form used must include all the elements included in the AAA form.

- Temperature requirements for hot, cold menu items or frozen meals.
  - 135°F or above for hot items
  - 41°F or below for cold items
  - A minimum of 20°F or frozen solid

- Food grade thermometers must be used. Thermometers must be correctly calibrated at least weekly, to ensure accuracy. Thermometers must be clean and sanitized between uses.
Daily Congregate Temperature Log

- Refer to form
Background Screening Requirements

- A "direct service provider as an individual that must (1) have face to face contact with a client while providing services and (2) have access to the client's living area, funds, personal property, or the client's personal identification information.

- Exemptions:
  - Allows DOEA to utilize Level 2 background screenings conducted by AHCA if the individual is providing a service within the scope of his/her license or employment as long as the screening was conducted within the previous 5 years. Copy of the Level 2 background screening may be obtained from AHCA's website.
  - Volunteers who assist on an intermittent basis for less than 20 hours per month and who are not listed on the FDLE Career Offender Search database [http://www.fdlc.state.fl.us/coflyer/home.asp](http://www.fdlc.state.fl.us/coflyer/home.asp) or the Dru Sjodin National Sex Offenders Public Website [http://www.nsopw.gov/Core/Portal.aspx](http://www.nsopw.gov/Core/Portal.aspx). The Provider is responsible for verifying that the volunteer is not listed in either database. If the individual's name appears on either website, they are not eligible for an exception and they must undergo Level 2 screening by DOEA.

- The individuals exempted above must complete and sign an Affidavit of Compliance- (Employee form) which you must keep in their file. Proof of verification from these websites must also be kept in their files for monitoring purposes.

- The Provider must complete the revised Background Screening Affidavit of Compliance-(Employer form) annually certifying that you are in compliance with the provision of Chapter 435 of the Florida Statutes. This form must be submitted annually along with your contract renewals.
Nutrition Documents Log

- Refer to Form
Section Five

- Service Definitions
Recreation Services

DESCRIPTION: Recreation is defined as participation in or attendance at planned leisure events such as games, sports, arts and crafts, theater, trips and other relaxing social activities. The purpose is to offer activities of interest for participants, increase physical and mental stimulation, prevent isolation, and encourage socialization.

DELIVERY STANDARDS/SPECIAL CONDITIONS: Services shall be provided that include activities which appeal to all program participants and levels of functioning; increase physical stamina in older persons; provide mental stimulation; provide social interaction; and provide an appropriate mix of individual and group activities.

PROVIDER QUALIFICATIONS: A person qualified by training or experience shall be designated to provide the service. Training shall include the process of aging, interest of the elderly, and acquiring knowledge of community resources available for use in recreational activities.

RECORD KEEPING AND REPORTING REQUIREMENTS:
1. Unit of Service: One hour of recreation activity regardless of the number of participants. Recreation cannot be counted as a separate unit of service, if delivered through adult day care services or adult day health care.
Transportation Services

DESCRIPTION: Transportation is defined as travel to or from community services and resources, health and medical care, shopping, social activities, or other life sustaining activities.

DELIVERY STANDARDS/SPECIAL CONDITIONS:
All transportation provided with federal, state and local government funds shall be purchased through a contractual arrangement with the community transportation coordinator (CTC) or approved coordination provider within the coordinated system. Exceptions are permitted in accordance with Chapter 41-2, Florida Administrative Code.

Transportation providers shall hold applicable licenses issued by the Department of Highway Safety and Motor Vehicles in accordance with Chapter 322, Florida Statutes, and shall maintain minimum vehicle liability insurance coverage, as required by law.

RECORD KEEPING AND REPORTING REQUIREMENTS:
Unit of Service—Individual: A unit of service is a one-way trip (the single entrance, travel to a destination, and exit of a client from a transportation vehicle).

Unit of Service—Group: A unit of service is a one-way trip (the single entrance, travel to a destination, and exit of clients, regardless of the number of clients, from a transportation vehicle).
Questions