



COVID FAQs FOR TITLE VI GRANTEES

Information for American Indian, Alaskan Native and Native Hawaiian Programs

*Last updated: May 11, 2020: Please note that information in **red** is information added through this update.*

ACL has received numerous questions related to how Title VI grantees can use grant funds to respond to the COVID-19 emergency. ACL has provided responses to many of the questions here. Click on a category below to see related questions.

[Nutrition & Supportive Services](#)

[Caregiver Services](#)

[Staffing/Personnel](#)

[Financial/Fiscal](#)

[Reporting](#)

[Disaster Operations](#)

[Title VI Conference](#)

[Title VI Helpful Links](#)

Nutrition & Supportive Services (Part A/B of Title VI)

- **Are the Families First Coronavirus Response Act (FFCRA) & Coronavirus Aid, Relief and Economic Security Act (CARES) grants only for food, or for anything Part A/B related?**

FFCRA and CARES funds are approved for services under Part A/B of Title VI, including the congregate meals program and the home delivered meals program, and funds must be used to support activities related to response of the Coronavirus. Funds could be used to pay for supplies and equipment directly related to your Title VI Nutrition Programs, including supplies and equipment such as carry-out containers, warming bags or coolers, and other supplies needed to support healthy living for elders during this COVID-19 pandemic and extended isolation period, personal protective equipment, paper towels/other supplies for tribal elders, stocking of food pantry for tribal elders and other Part A/B supportive services (transportation, visiting, telephoning, chore, etc.).

- **Can I use Part A/B funds to purchase groceries (or pantry items or food boxes, etc.) for native elders due to the COVID-19 emergency?**

It's first recommended that programs provide meals to elders that meet the dietary guidelines required by the Older Americans Act, regardless of whether that meal is in hot, frozen or shelf-stable. You can also purchase meat, eggs, and other things that the elder can cook. However, if during the response to the COVID-19 crisis, a program is unable to procure meals that meet the dietary requirements, then they may purchase groceries for elders using Title VI Part A/B or FFCRA and CARES funds. When purchasing any foods for elders, the nutritional needs of the community, as determined by your program's needs assessment, should be considered and should factor into the purchases.

- **Can I use my Title VI Part A/B FY19 No Cost Extension funds for COVID-19 Response?**

Yes. Title VI funds allow for nutrition, supportive services, and other services needed to maintain elders in their homes and communities.

ACL recommends using your grant awards in the following order:

1. FY19 No-Cost Extension (NCE) (this has the "soonest" project end date) Title VI Part A/B grants;
2. FFCRA (these funds are only for COVID response) grants;
3. CARES Act (these funds are only for COVID response) grants;
4. FY20 Title VI Part A/B grants

- **Can tribes use the FFCRA and CARES grants to pay for major purchases (e.g., a vehicle to help deliver meals now that folks have been moved from congregate to home-delivered programs)?**

Title VI grantees are strongly encouraged to use Title VI funds to make large purchases. However if no other funds are available, FFCRA and CARES funds can be used to make a major purchase as long as the purchase supports the program's response to the COVID-19 emergency and is an allowable cost under Title VI Part A/B.

Equipment purchases exceeding \$5,000 must receive prior approval from ACL prior to purchase. Find [Guidance for Large Purchase Request with ACL/AoA Title VI Grant Funds here](#).

- **What are some examples of Part A/B services that are allowable for responding to COVID-19?**

Title VI services that are allowed under Part A/B include, but are not limited to:

- **Homemaker Service:** Providing light housekeeping tasks in an elder's place of residence. Tasks may include but are not limited to preparing meals, shopping for personal items, laundry, managing money, or using the telephone in addition to other light housework.
- **Chore Service:** Performance of heavy household tasks provided in an elder's home. Tasks may include yard work or sidewalk maintenance in addition to heavy housework; such as heavy cleaning, yard work, walk maintenance, minor home repair, wood chopping, hauling water, and other heavy-duty activities which the elder(s) is unable to handle on their own and which do not require the services of a trained homemaker or other specialist.
- **Telephoning:** Phoning in order to provide comfort or check up on the elder. The elder should be reached and spoken to in order for the contact to be counted.

For more examples of Title VI services, please see [the Program Performance Reporting definitions, here at Older Indians](#).

- **Can we buy gift cards to grocery stores to buy food for elders?**

We do not recommend gift cards to buy food for elders because they present a number of challenges in terms of security and accounting. Instead of gift cards, we recommend ensuring that elders will receive nutritious foods, such as through the purchase of groceries, or providing restaurant vouchers to elders. If gift cards were provided, your program would need to have robust policies and procedures surrounding the gift cards, including: assessment procedures of individuals who receive the gift cards, the quantity and frequency that you would allow such gift cards to be provided, how you would confirm and document that the gift card was used for healthy food for elders (and not other purposes), and policies about equitable distribution of the gift cards.

- **Are the FFCRA and CARES funds separate grants from our FY20 Title VI funding and the FY19 Title VI no-cost extension funding?**

The FFCRA and CARES funds were awarded as a separate grant awards. Please note, FFCRA and CARES funds are approved for services under Part A/B of Title VI, including the congregate meals program (when this becomes a common practice) and the home delivered meals program, and funds must be used to support activities related to response of the Coronavirus. Also, please remember that FFCRA, CARES Act, FY19 no-cost extension, and FY20 funds must be accounted for separately from the regular Title VI funding.

- **Can we use Title VI or FFCRA/CARES grants to provide grocery and basic necessity services to other tribal or non-native elders and their families that are outside of our approved Title VI service area?**

Title VI, FFCRA and CARES grants can only be used to provide services to individuals who are within the Title VI approved service area (as indicated in the Title VI grant application) and who are Title VI eligible, even if the individual has never received Title VI services before. Other funding sources would need to be used to serve elders considered non-eligible by Title VI standards, or elders who live outside of the approved service area.

- **Can FFCRA and CARES Act funding be used for traditional healing methods?**

Supplemental funding can be used for any service that is approvable under your regular Title VI grant.

- **Can we use Title VI Part A/B and FFCRA/CARES grants to make hot meals and freeze them to make meals available to elders when the shelf stable foods are no longer available?**

Yes.

- **Do you have any suggestions on vendors to contact regarding meal preparation or grocery purchases for elders?**

There are some national vendors that may be able to provide shelf stable and/or frozen meals. Both kinds of meals may need to be supplemented with milk, bread and fruit.

Title VI programs may want to consider buying boxes or bags of groceries that would provide multiple meals. Boxes or bags of groceries do not constitute meals and are not to be reported as meals.

Title VI programs may consider assembling bags or boxes of preselected nutritious foods that would contribute to a healthy diet and the management of chronic disease such as lower sodium canned meats, fish, soups,

stews, sauces, vegetables or vegetable juices or fruits canned in their own juices or light syrup or whole grain crackers, pasta or rice. It is important to consider that the food item packaging should be easy to open and that the foods should be easy to prepare. Many current home-delivered participants have multiple functional impairments which might include limited ability to prepare food as well as limited safe storage.

The National Resource Center on Nutrition and Aging is being updated on a regular basis and will have information on this topic on its website <https://nutritionandaging.org/covid-19/>.

- **What Personal Protective Equipment (PPE) should the cooks and meal deliverers be wearing while preparing and delivering to elders?**

Title VI programs should already have emergency protocol and Continuity of Operations Plans (COOP) established and these may need to be updated, given the unique circumstances of the pandemic. ACL suggests that the Title VI program work with Tribal leadership to obtain PPE from FEMA or work with IHS as to the best way to obtain it.

Food preparation should follow all the usual procedures for safe and sanitary production, including food safety protocols and best practices in place, including the use of food service gloves. At this time, masks would also be recommended.

Delivery should be as contactless as possible following procedures that minimize contact between the person delivering the meal or food and the elder.

ACL recommends the program follow Tribal Health Department guidance as well as CDC guidance as found at <https://acl.gov/COVID-19>, including https://acl.gov/sites/default/files/COVID19/C19FAQ-NutritionEM_2020-03-12.pdf.

- **Could we use Title VI funds to purchase loads of wood for our elders to use to heat their homes?**

Yes. This would be considered as an “Other Supportive Service” for reporting purposes. Other services that that could be included under this category include groceries, toilet paper, paper towels, hand sanitizer, incontinence supplies, Ensure, cleaning supplies, etc.

- **Can we use our Title VI funds to purchase drinking water for our elders?**

Yes. This would be considered as an “Other Supportive Service” for reporting purposes.

- **If a person with a disability lives in the home with the elder, can the person with a disability receive services?**

Yes. If a person with a disability he same home as an elder they can receive nutrition services nder Part A/B of Title VI.

- **Can we use Title VI funding to purchase phones for our elders?**

Yes, phones for elders can be purchased to be used for contacting elders, to avoid social isolation, as part of the COVID-19 response.

- **Can we use Title VI funding to pay for a robotic calling service?**

Yes. Title VI funding can pay for a robotic calling service that is being used to avoid social isolation amongst elders while social distancing measures are in place.

- **Can Title VI funding be used to purchase temporary housing?**

Yes. Programs can use Title VI funding to provide temporary housing in situations where well family members need to be sequestered from sick family members they usually live with. This temporary housing could be in the form of tents or tipis, or using Title VI funding to pay for a hotel stay. Please note, this Title VI funding should be to fill funding gaps when no other funding source is available.

[Return to top of document](#)

Caregiver Services (Part C of Title VI)

- **Can Title VI Part C funds be used for disaster response? And what can we use these funds for?**

Yes, these funds can be used for disaster response for caregivers. You can use Part C funding on any service necessary to assist a caregiver during the disaster response. Title VI programs have the liberty to decide the best use of these funds.

- **Can tribes in states that have received a major disaster declaration use their Part C grant funds for meals to elders?**

Yes. Once a Major Disaster declaration is approved (by the President for your Tribe, or your Tribe is included in a Major Disaster Declaration that was approved for the state), Older Americans Act Section 310(c) permits tribes to use any portion of the funds made available under any and all sections of the Act for disaster relief for older individuals. In this regard, flexibility is provided for tribes to use existing grants already made to them under Title VI Part A/B and Part C for disaster relief.

- **Can I use Part C funds to purchase groceries (pantry items, food boxes, etc.) for tribal elders due to the COVID-19 emergency?**

It's first recommended that programs provide meals to elders that meet the dietary guidelines required by the Older Americans Act, regardless of whether that meal is in hot, frozen or shelf-stable. However, if during the response to the COVID-19 crisis, a program is unable to procure meals that meet the dietary requirements, then they may purchase groceries for elders. If a Major Disaster declaration is approved (by the President for your Tribe, or your Tribe is included in a Major Disaster Declaration that was approved for the state), OAA Section 310(c) permits tribes to use any portion of the funds made available under any and all sections of the Act for disaster relief for older individuals. In this regard, flexibility is provided for tribes to use existing grants already made to them under Title VI Part A/B and Part C for disaster relief.

- **If a person with a disability resides in the same home as an elder's caregiver, but not in the same home as the elder they care for, can that a person with a disability receive services?**

If a person with a disability lives with a caregiver, and it is determined the providing assistance to the person with a disability would help the caregiver, the person with a disability can receive services permitted under Part C.

[Return to top of document](#)

Staffing/Personnel

- **If our tribe has shut down our Title VI program, can I still collect a salary if all or part of it is paid with Title VI funds? What if I'm placed on administrative leave?**

Yes, you may use Title VI funding to pay for your salary which you will continue to collect, even while programs may be shut down, as long as this is in accordance with your Tribe's policies and procedures. When working on the program and teleworking, that is allowable. Additionally, if placed on Administrative Leave, or similar leave, you may use federal funds to pay for leave, see [45CFR75.430-431](#), and specifically see 431(b). There is a requirement that the policy is written. Having a written tribal policy will be important in future audit reviews.

- **If our drivers are mainly delivering senior meals, could the emergency funds we received be used to help supplemental their salaries temporarily?**

You may use Title VI funds to pay the salaries of drivers for the work they are doing for the Title VI program. We also note, that you may use your supplemental funding (FFCRA, CARES) for activities related to the disaster response, including delivering meals to seniors.

- **Can we charge the grant for time staff spends disinfecting our tribally-managed residential community?**

Yes.

- **Are we able to give bonus pay to the employees who are working during this time?**

Yes, as long as the bonus pay is reasonable, allowable, and allocable. Please see selected items of costs [45CFR75.430](#) on compensation for personal services. The organization must have in place and follow policies and procedures to award bonuses. We require that the organization follow their written policies and procedures.

- **Can we temporarily waive background checks for staff working in the Title VI program, including our food servers and delivery drivers?**

The OAA does not address this issue. Rather, it is the responsibility of each Title VI grantee to develop its own policies and procedures to address human resources administration. The Tribe also should have emergency protocol and Continuity of Operations plans (COOP) established that may contain policies which touch upon this question. That being said, the safety and security of clients who receive OAA services is of utmost importance; many businesses are hiring at this time, and it is possible that background checks could be performed. We recommend that the Tribe's Human Resources department also be consulted for guidance and assistance.

- **Can we provide hazard pay to our Title VI employees during the pandemic?**

Yes, as long as your tribe's policies and procedures allow for this.

[Return to top of document](#)

Financial/Fiscal

- **Can we use the FFCRA/CARES grants to pay for expenses we incurred prior to the effective date of the FFCRA/CARES funding?**

Because the Title VI grantees have been impacted by COVID-19, ACL has waived prior approval requirements for pre-award costs incurred from January 20, 2020 to the effective date of the Federal Awards for the FFCRA and CARES Act funds.

- **Can we use the FFCRA/CARES grants to pay indirect costs?**

Yes. Indirect costs (IDC) can be charged against Title VI Part A/B and Part C grants, as well as the FFCRA and CARES grants. Please note: IDC cannot be charged to NSIP grants.

- **Will I need to report on another/separate 425 for the FFCRA and CARES funds?**

Yes. FFCRA and CARES funding must be accounted for and reported on separately. SF-425 reports required for each grant: the annual reports are due on 4/30/21 and the final SF-425 due on 12/30/21.

- **How are FFCRA and CARES funds awarded?**

FFCRA and CARES grants were allocated through the same population-based funding formula that is used to award Title VI Part A/B and C grants.

- **Will we receive additional supplemental funding beyond the FFCRA? What is the dollar amount of these funds and when will they be distributed?**

Yes. The CARES Act approved additional supplemental funding for all Title VI grantees and was issued on April 20, 2020. The amount of this funding was determined based on the same funding formula used to calculate the amount of your Title VI grants.

- **Can Title VI funding be used to pay cost-sharing for other federal programs, including FEMA grants?**

Federal funds may not be used to match other Federal funds unless there is specific statutory authority to do so [45 CFR 75.306(b)(5)]. If the other federal program has specific statutory authority the following conditions must be met if Title VI funds are to be used to match other Federal funds:

- All specific terms and conditions of the Title VI grant; including all applicable Title VI provisions and uniform administrative cost principles, and audit requirements for Federal awards;
- The intent of Title VI;
- All applicable Federal, State and local legislation; and
- The Federal agency has the statutory provisions necessary to allow its grantees to count other Federal funds as matching contributions for their project costs.

Please note, these are only the ACL requirements. For Title VI funding to pay the cost-sharing of other Federal programs, the requirements of those other Federal programs must also be met.

[Return to top of document](#)

Reporting

- **Will we report the services we provide with FFCRA/CARES funding in the PPR?**

Yes, you should be tracking the services you are providing, the number of elders and caregivers you are serving, and the units of service you are providing with FFCRA funding. ACL will share further information on programmatic reporting soon.

- **Will I need to report on another/separate 425 for the FFCRA funds?**

Yes. The FFCRA funding is on a different reporting period from the Title VI grants. There are 2 SF-425 reports required for FFCRA grants: the annual report due on 4/30/21 and the final SF-425 due on 12/30/21.

- **Do we need to count boxes of groceries toward our meal count? If so, how is this done?**

Boxes of groceries will not be counted as a meal. Instead, you will report these separately. We will provide additional information about reporting requirements as they become available.

[Return to top of document](#)

Disaster Operations

- **Can tribes in states that have received a major disaster declaration use their Part C grant funds for meals to elders?**

Yes. Once a Major Disaster declaration is approved (by the President for your Tribe, or your Tribe is included in a Major Disaster Declaration that was approved for the state), Older Americans Act Section 310(c) permits tribes to use any portion of the funds made available under any and all sections of the Act for disaster relief for older individuals. In this regard, flexibility is provided for tribes to use existing grants already made to them under Title VI Part A/B and Part C for disaster relief.

- **We have very limited access to PPE. Do you have suggestions on where to obtain it?**

We understand the challenges the PPE shortage has placed on tribes. We have been in contact with our federal partners, and believe the best way for a title VI program to obtain PPE is to work with tribal leadership, because they are best suited to make these requests to FEMA and also work with your IHS provider. Title VI funds can be used to purchase the supplies to make masks, if that is something your community is interested in.

- **Can our Title VI program not use funds for COVID relief unless our Tribe receives a major disaster declaration?**

You can use your Title VI funding for disaster relief even if your tribe does not have a major disaster declaration. A major disaster declaration allows a tribe to use any portion of their funding to provide services under any part of the OAA. However, even without a major disaster declaration the OAA still offers great spending flexibility. For instance, Part A funds could be used to pay for supplies and equipment directly related to your Title VI Nutrition Programs, including supplies and equipment such as carry-out containers, warming bags or coolers, and other supplies needed to support healthy living for elders during this COVID-19 pandemic and extended

isolation period, PPE, paper towels/other supplies for tribal elders, stocking of food pantry for tribal elders and other Part A supportive services (transportation, visiting, telephoning, chore, etc.)

- **Will our program not receive part of the FFCRA or CARES funds if our tribe does not receive a major disaster declaration?**

All FY17-FY19 Title VI grantees received funding under FFCRA, and all FY20-FY23 Title VI grantees received funding under CARES Act, regardless of whether they have a major disaster declaration.

- **Does ACL have a State of Emergency template?**

We have not developed a State of Emergency template.

- **Can we use Title VI funds to purchase materials for homemade face masks and to pay someone to make them?**

Yes. You may use Title VI funding for the materials and labor associated with making face masks. There are tutorials on how to make a homemade face mask in [Title VI Helpful Links](#) section (below).

- **How do we properly use PPE?**

The CDC has compiled information on how to put on and take off PPE (<https://www.cdc.gov/coronavirus/2019-ncov/hcp/using-ppe.html>). The CDC has also put out guidance on optimizing the supply of PPE (<https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/index.html>).

- **What is the difference between an N95 mask and an N95 respirator?**

An N95 mask and N95 respirator are the same thing. These are two different terms for the same item. The difference between an N95 mask (and respirator) is described her (<https://www.cdc.gov/niosh/npptl/pdfs/UnderstandDifferenceInfographic-508.pdf>).

[Return to top of document](#)

Title VI National Conference

- **Will the Title VI national conference be held virtually?**

We hope to hold a national conference in-person this year.

- **Our organization has travel restrictions, how do we attend the national conference?**

At this time, we do not know when we can schedule in-person trainings again. If the national conference does not take place in 2020, the term and condition of the Title VI A/B grant award that requires participation at the national conference will be waived.

[Return to top of document](#)

Title VI Helpful Links

| Title VI Helpful Links | |
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| Large families living in the same home | https://www.cdc.gov/coronavirus/2019-ncov/downloads/living-in-close-quarters.pdf |
| Running essential errands | https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/essential-goods-services.html |
| Preparing your home for a disaster and a disaster checklist | https://www.cdc.gov/coronavirus/2019-ncov/downloads/COVID19_FAQ_HouseholdReady-H.pdf https://www.cdc.gov/coronavirus/2019-ncov/downloads/COVID19_FAQ_HouseholdReady-H.pdf |
| The different types of face masks | https://www.cdc.gov/niosh/npptl/pdfs/UnderstandDifferenceInfographic-508.pdf |
| How to make your own face covering | https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html |