

# Idaho Commission on Aging Technical Guidance



Subject	<b>Major Disaster Declaration (MDD) Allowable Expenses</b>		No.	TG.AD.09
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<b>Version History</b>				
Version	Revision Date	Description of Change	Author	
01	08/04/2021	Updated requirements to include ACL guidance regarding obligated funding.	Vicki Yanzuk	

## **Title: Major Disaster Declaration (MDD) Allowable Expenses**

### **REQUIREMENTS:**

#### Grant Awards

- Older Americans Act (OAA) Title Funding and match requirements
- Family First Coronavirus Response Act (FFCRA) and required match for Area Plan Administration
- Coronavirus Aid, Relief, and Economic Security (CARES) and required match for State and local Plan Administration

MDD flexibility applies to OAA, FFCRA, and CARES Act funding during the period the MDD is in effect. In accordance with ACL guidance, obligated funding under the MDD flexibility is available until the MDD for COVID-19 under the Stafford Act is repealed and the obligation is liquidated, or the project period ends.

Under the Presidentially approved MDD for COVID 19 under the Stafford Act, Section 310(c) permits states to use any portion of the funds made available under sections of the Act for disaster relief for older individuals. In this regard, flexibility is provided for States – without the need for a separate application, transfer request, or request for a waiver -- to use existing allocations already made to them under the Act for disaster relief. References: ACL’s 4/23/2020 Q&A & ACL 7/9/2021 SUA Fiscal Training

For ICOA to maintain fiscal and programmatic tracking the AAAs must do the following:

- Fiscal: Utilize the **Budget Transfer Request form (FO.AD.04)** and submit it to ICOA's Senior Financial Specialist to transfer funds from a specific budget line-item to another. During the MDD, funds can be transferred between all **Titles III** programs.
- All **service delivery changes** must be approved by ICOA. This allows ICOA to track the changes and make any modification to the data collection system.
- All **new services** must be approved by ICOA: line-items must be added to the budget, units identified and setup in the data collection system.
  - To resolve any immediate emergency to a senior, at the discretion of the AAA Director, service can be provided prior to ICOA getting the budget and tracking system set up. The AAA Director must keep detailed documentation: date, client, service method, units provided and cost.

**Match Requirements – Only for State and Area Plan Administration:**

Area Plan Administrative funds are calculated as 10% of the cumulative portion of the Title III, FFCRA and CARES funding. Area Plan Administration requires 25% match, which each AAA can use existing state funding to meet this requirement. No Area Plan Administration funds are eligible from the Title VII funding.

**Guidance Updates:**

This ICOA Technical Guidance may be updated as additional information or reporting requirements are received from the Administration for Community Living.

**Record Keeping**

Title III OAA, FFCRA and CARES funds are expected to be fully accounted for. The AAA must consider all record keeping and fiscal tracking requirements to ensure funds are spent in accordance with federal and state guidance, policies, rules and regulations.

**New Senior Services in Idaho:**

1. Friendly calling to check the well-being of seniors as they follow the stay-at-home order.
  - **Eligible Program:** Title IIIB: new service name, “Friendly Caller Program” set up in budget and unit measure in GetCare
  - **Service Implementation:**
    - AAA III first to set up service: March 18, 2020
    - AAA VI set up service on April 6, 2020
2. Service Delivery for groceries, supplies and prescriptions
  - **Eligible Program:** Title III-B: Supportive Services (budget line items set up)
    - Service Delivery for groceries, supplies and prescriptions has been set up.
  - **Service Implementation:**

- Technical Guidance April 21<sup>st</sup>: support existing delivery service or a pay per mileage reimbursement

### **Service Delivery Changes in Idaho**

1. Nutrition Services: As outlined in TG.AD.06 Families First Coronavirus Response Act 3/26/2020
2. CARES funding:
  - **Eligible Program:** Title IIIB Supportive Services: Legal Assistance
  - **Service Implementation:**
    - AAAs will provide budget amendment with local Idaho Legal Aid offices

### **Examples from Administration for Community Living FAQs**

1. Pay primary caregivers for time spent providing care:
  - **Eligible Program:** Title IIIB: Supportive Services: **No specific line item has been set up**
    - Homemaker: personal care, housekeeping, meal planning and preparation, personal errands, bill paying and medication management
  - **Service Implementation:**
    - Service has not been requested nor budget and unit tracking set up
  - **Eligible Program:** Title IIIE: Family Caregiver: **No specific line item has been set up**
    - payment to family members, including a primary caregiver, for providing respite or supplemental services to eligible family caregivers
  - **Service Implementation:**
    - Service has not been requested nor budget and unit tracking set up
2. Hire additional staff specifically to provide transportation to doctor appointments or for pharmacy and grocery delivery: **See Idaho Implemented services #2 above**
  - **Eligible Program:** Title III-B: Supportive Service
  - **Service Implementation:**
  - **Eligible Program:** Title III-E: Family Caregiver
  - **Service Implementation:**
3. Develop statewide, regional or local media campaigns aimed at caregivers and promoting services available through ADRCs
  - **Eligible Program:** Title III-B: Supportive Services
    - Public Information line item: Budget Line item and unit measures are set up
  - **Service Implementation:**
    - Will build into rapid ADRC response planning as part of grant
  - **Eligible Program:** Title III-E: Family Caregiver

- Information service
  - **Service Implementation:**
    - Will build into rapid ADRC response planning as part of grant
- 4. 3% requirement for spending on legal and ombudsman services apply to the B money we will be receiving from the CARES Act: **See Idaho Service Change #2 above**
  - Legal assistance will increase to meet overall 3% of Title IIIB funding (legal assistance does not include local match)
- 5. Purchase tablets, iPads and or other “devices” etc. for use by older adults/family caregivers with the supplemental funding

We encourage OAA programs to coordinate with existing programs such as ACL’s Assistive Technology programs: <https://acl.gov/programs/assistive-technology/assistive-technology> prior to use of OAA funds for purchase of devices.

- **Eligible Program:** Title IIIB Supportive Services (must identify specific line-item)
- **Service Implementation:**
  - Requires line-item budget request for equipment
- **Eligible Program:** Title IIIE Family Caregiver (must identify specific line-item)
- **Service Implementation:**
  - Requires line-item budget request for equipment
- **Eligible Program:** Title VII Ombudsman (must identify specific line-item)
- **Service Implementation:**
  - Requires line-item budget request for equipment
- 6. Purchase cell phone, internet/Wi-Fi, or broadband access if such services are not otherwise available in the homes of older adults/family caregivers with the supplemental funding

We encourage OAA programs to coordinate with existing programs such as ACL’s Assistive Technology programs: <https://acl.gov/programs/assistive-technology/assistive-technology> prior to use of OAA funds for purchase of devices.

- **Eligible Program:** Title IIIB Supportive Services (would need to create social isolation budget line-item and determine unit measurement)
  - Purchasing cell phone or internet access would be permissible under III-B to assist in addressing social isolation;
- **Service Implementation:**
  - Requires set up

- **Eligible Program:** Title IIIC Nutrition Services (would need to identify budget description and determine unit measurement)
  - To assist in ordering food and meals
- **Service Implementation:**
  - Requires set up
  
- **Eligible Program:** Title IIIE Family Caregiver (would need to identify budget description and determine unit measurement)
  - To assist in the provision of virtual caregiver support
- **Service Implementation:**
  - Requires set up
  
- **Eligible Program:** Title VII Ombudsman (would need to identify budget description and determine unit measurement)
  - To facilitate virtual visitation of facilities
- **Service Implementation:**
  - Requires set up