Idaho Commission on Aging Technical Guidance

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| --- | --- | --- | --- |
| Subject | **American Rescue Plan Act Funding** | No. | TG.AD.13 |
| Effective Date | 07/01/2021 | Version No | 04 |
| Contact | Vicki Yanzuk | Contact Info | 208-577-2847 |
| Sub-Policies | 13.1, 13.2, and 13.3 | Review Date | 12/2024 |
| Version History |
| Version | Revision Date | Description of Change | Author |
| 02 | 04/25/2022 | Modified to include 13.4 - Title III D  | Vicki Yanzuk |
| 03 | 09/19/2022 | Modified to clarify “bucketing” and add Year 2 Time Frames  | Vicki Yanzuk |
| 04 | 05/01/2023 | Add Year 3 Time Frames | Vicki Yanzuk |

# Intent:

On March 11, the American Rescue Plan Act (ARPA) of 2021 (P.L. 117-2) was signed into law by President Biden, Section 2921 of the law appropriated funding to carry out the Older Americans Act of 1965 (OAA). Funds expended from the Title III COVID-19 Supplemental funding are to mitigate negative effects of the Coronavirus Emergency. Funds must be expended on allowable Older Americans Act activities as defined by the Administration for Community Living FAQ ARPA Guidance.

The State of Idaho, Idaho Commission on Aging (ICOA) will utilize ARPA funding to enhance Older Americans Act and Idaho Senior Services Act services by placing focus and emphasis on developing the aging networks service infrastructure. Funding will be utilized to close known gaps, meet strategic goals, create State level programming, and support AAA services affected by COVID 19. This guidance is not a new law. It is an interpretation of existing law as authorized by Idaho Code and incorporated by contract.

*It is expected that funds will be spent in substantial agreement of the stated intent. Any deviations must be discussed with ICOA leadership* ***prior*** *to obligation of funds.*

# Funding:

## Distribution:

Funds will be distributed to each AAA based on the US Department of Health and Human Services, Administration for Community Living federally approved intrastate funding formula as approved in Idaho’s State Senior Services Four-Year Plan.

## Administrative Costs:

Area Plan administration expenditures are allowable. Allowable amounts will be distributed via the ICOA – AAA Budget Template.

## Funding Shifts between Title Programs:

“Bucketing” flexibilities between C1 and C2 ARPA funds are permitted.

## Fiscal Reporting Requirements

ARPA funds are issued under a separate grant award number. Funds must be accounted for separately from the issuance of all other funding including other OAA funding.

## Match Requirements:

The American Rescue Plan Act did not waive match requirements for services and administration. All Title III Older Americans Act match requirements are in effect.

## Equipment:

Equipment purchases made by the AAA exceeding $5,000 must receive prior approval from ICOA prior to purchase.

## Timeline:

The ICOA ARPA award project period is 4/1/2021 – 09/30/2024. Budget allocations are aligned with the State fiscal year 7/01 – 6/30. Appropriation will be issued to the ICOA by the Idaho Legislature yearly on a State fiscal time frame. AAAs should strive to utilize ARPA funding in the year awarded to ensure continued access to funding. ICOA will request a yearly appropriation until all funding is expended.

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| Time Frame | Start Date  | End Date  | State Fiscal Year |
| Year 1 | 07/01/2021 | 06/30/2022 | 2022 |
| Year 2 | 07/01/2022 | 06/30/2023 | 2023 |
| Year 3 | 07/01/2023 | 06/30/2024 | 2024 |

# Documentation:

## Guidance Updates:

ICOA Technical Guidance may be updated as additional information or reporting requirements are received from the Administration for Community Living. Please consult the ICOA website for the most current edition.

## Record Keeping

Funds are expected to be fully accounted for. The AAA must consider all record keeping and fiscal tracking requirements to ensure ARPA funds are spent in accordance with federal and state rules and regulations.

## Unit Documentation:

Each Title services has Unit documentation requirements that must be entered into the State’s Management Information system, GetCare. Unless otherwise specified, within individual program guidance, the AAA should track units in accordance with existing ICOA guidance.

## Communication with Stakeholders:

It is the strong recommendation that AAAs craft communication documents for clients/participants and service providers.

## Program Reporting:

Additional programs reports are specified under individual program guidance.

## Contractual Agreements:

The AAA is required to enter into, amend, or negotiate all contractual arrangements with sub- contractors as required by the Performance Based Agreement.

# References:

## Authorizing Federal Awards:

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| --- | --- | --- |
| **Title** | **Federal Award** | **CFDA** |
| III B | 2101IDSSC6-00 | 93.044 |
| III C1 | 2101IDCMC6-00 | 93.045 |
| III C2 | 2101IDHDC6-00 | 93.045 |
| III E | 2101IDFCC6-00 | 93.052 |
| IIID | 2101IDPHC6-00 | 93.043 |

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| --- | --- | --- | --- |
| Subject | **Title III B American Rescue Plan Act Funding** | No. | TG.AD.13.1 |
| Effective Date | 07/01/2021 | Version No | 01 |
| Contact | Janet Miller | Contact Info | 208-577-2854 |
| Version History |
| Version | Revision Date | Description of Change | Author |
| 2 | 04/29/2022 | B.7 added, Transportation expanded | Vicki Yanzuk |
| 3 | 09/20/2022 | Add Secondary Priority Use of Funding in Year 2 | Vicki Yanzuk  |

1. **Purpose of Funding:**

Title III B funding is designed to meet the State Plan goal and objective to assist older Idahoans live as independently as possible and prevent institutionalization. ARPA funding is further designed to target services to clients who, without these one-time funds, are unable to quickly mitigate and prevent unsafe or unhealthy living conditions and participate in their communities. Funding is targeted to prevention and mitigation activities related to COVID 19 including:

* 1. Efforts related to COVID–19 vaccination outreach including education, communication, transportation, and other activities to facilitate vaccination of older individuals.
	2. Social Isolation services that promote or support social connectedness and reduce negative health effects such as:
		+ Investments in technological equipment.
		+ Solutions aimed at alleviating negative health effects due to long-term stay-at- home recommendations for older individuals.
	3. Supportive services to ensure safe community living.

## Priority Use of Funding:

The AAA is required to prioritize funding utilization in technology, vaccination support, and targeted supportive services as outlined below. The AAA must establish the required planning, collaborations, and contractual arrangements necessary to implement and deliver programming.

## Technology:

Funds may be utilized to invest in technological equipment, training, and resources that will positively impact or prevent social isolation in individuals 60+ such as:

* + Creation of a technology lending library for situations such as attending classes and training. Ex: tablets and hotspots.
	+ Purchasing technology for a specific individual. Ex *Joy For All* robotic pets.
	+ Partnerships with the Idaho Assistive Technology Program
		- Services and assistive devices that are designed to meet the unique needs of older individuals who are disabled.
		- Social isolation toolkit development and incorporation into I&A processes.

AAAs must have policies and procedures governing the provision and usage of purchased technology devices. The policies and procedures must consider:

* + Loan duration and return procedure.
	+ Permanent device(s) purchase internal review and assessment.
	+ How IT support is or is not provided.
	+ Who is responsible for broken, lost or stolen device(s).

## Vaccination Outreach and Education:

Funds may be utilized for Covid-19 vaccine outreach efforts that include education or administration of the vaccine. Examples include social media outreach or collaborating with health organizations to promote and facilitate rural vaccine administration events.

## Homemaker, Chore, and Home Modification Targeted Supportive Services:

Funding may be utilized for homemaker, chore services or home modification services in relation to restoring homes and yards to safe and livable conditions as a result of neglect during the COVID 19 pandemic.

Examples of allowable services:

* + Hazardous waste or disaster cleaning services.
	+ Unsafe conditions pruning and yard maintenance services.
	+ Patching of unsafe concrete.
	+ Construction/repair of mobility ramps.
	+ Purchase and installation of fall prevention bars.
	+ Maintenance or repair to necessary home systems such as plumbing and heating and cooling systems.
	+ Pest control or fumigation.
	+ Household appliances such as refrigerators or stoves that are necessary to remain safely in the home.

The AAA is required to develop a program process that addresses:

* + Leveraging local area volunteers, non-profits, and private industry to assist in service implementation.
	+ Waiving of cost share due to undue hardship.
	+ Internal review and authorization of services/goods. A client cap is not required by ICOA but AAAs must have a method to provide reasonable allotments and ensure funding distributions are reviewed with regularity.

## Transportation Targeted Services:

The AAA may provide transportation vouchers to individuals 60+ to assist older Idahoans receive the Covid-19 vaccine and/or alleviate negative health effects due to long-term stay-at- home recommendations. Transportation needs must be one-time or short duration, less than 6 months, with a known service end date. The AAA is required to have a process that addresses authorization, such as registering the transportation client into GetCare, and the reimbursement methodology. Reimbursement methodologies can include utilizing the existing state mileage reimbursement rate or a fixed amount.

AAAs may also support increased transportation activities to relieve social isolation through Senior Center transportation programs.

## Social Isolation Targeted Supportive Services:

The AAA has discretion to plan, develop, and implement programs to offer social engagement programming and education to reduce social isolation. The AAA should align program design with the [engAGED Resource Center](https://www.engagingolderadults.org/) and [Commit to Connect](https://acl.gov/CommitToConnect). ICOA will engage with the AAA as a stakeholder and assist in development of data tracking.

## Legal Services:

The AAA is required to support Legal Services with Title III B funding, including ARPA, at the required 3%. The AAA is encouraged to work with their contracted Idaho Legal Aid office to identify legal trends occurring because of COVID 19. Examples include housing/eviction or fraud.

## Ombudsman:

AAAs may support Long-term Care Ombudsman activities including volunteer support. This could include the hiring temporary staff.

## Year 2 Funding - Secondary Priority Use of Funding:

## AAAs may utilize up to 80% of Year 2 ARPA Title B funds to meet demands on contracted services approved in the SFY 23 AAA Budget. This includes services the AAA has contracted under OAA Federal Title III and State Services Match such as routine Homemaker.

## The AAA must develop a plan to monitor client enrollments and attrition rates. AAAs must ensure any increases in client service enrollments utilizing ARPA funding can decrease with natural attrition or other means without harm to clients. The AAA may also develop a plan and program to provide temporary service to clients. Clients must be aware of the service start and end dates if the AAA provides temporary services.

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| Subject | **Title C1/C2 American Rescue Plan Act Funding** | No. | TG.AD.13.02 |
| Effective Date | 07/01/2023 | Version No | 04 |
| Contact | Birgit Luebeck | Contact Info | 208-577-2860 |
| Version History |
| Version | Revision Date | Description of Change | Author |
| 4 | 05/01/2023 | Year 3 Updates | Birgit Luebeck |
| 4 | 06/20/2023 | Ownership of items | Birgit Luebeck |
| 4 | 01/31/2024 | Carryover Funding | Birgit Luebeck |
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## Purpose of Funding:

ARPA C1 and C2 funding is intended to mitigate and prevent negative effects of the Coronavirus. Funds may only be used for Idaho non-profit meal providers/sites currently contracted with an Area Agency on Aging and located within local county and city jurisdictions.

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| Time Frame | Start Date  | End Date  | State Fiscal Year |
| Year 3 | 07/01/2023 | 06/30/2024 | 2024 |

* 1. **Year 3 Distribution:**

Year 3 is defined as SFY 24 July 1, 2023 – June 30, 2024.

## Year 3 Distribution

Funds will be distributed to each Area Agency on Aging (AAA) based on the federally approved intrastate funding formula and the processes below:

|  |  |
| --- | --- |
| Funding by AAA | C1 &C2 |
| Area I | $ 298,865.93 |
| Area II | $ 148,968.08 |
| Area III | $ 632,714.70 |
| Area IV | $ 245,993.85 |
| Area V | $ 196,030.36 |
| Area VI | $ 196,289.07 |
| Total: | $ 1,718,861.99 |

## Specific Use of Funds (Year 3 only) July 2023 – March 2024:

* 1. **Meal site modernization:**
		1. The ARPA SFY 2024 funding is an opportunity for meal providers/sites to get reimbursed towards the modernization of their meal programs. Modernization funds must be expended by 03/31/2024. Payments will be reimbursed from the AAA to the meal site upon receipt of appropriate documentation.
		2. Ideas for allowable expenses include the following:
			+ Upgrade/modernization of equipment: Freezer, fridge, oven, kitchen hood, dishwasher, installation, and warranty costs etc.
			+ Increase ADA accessibility and safety: parking, ramps, safety bars, vehicles.
			+ Technological enhancements: Add new software such as [MySeniorCenter.com](https://myseniorcenter.com/) , or <https://accessiblesolutions.com/> to allow for further educating meal provider staff on IT and taking supportive classes such as grant writing, Excel, Word.
			+ Creation/upgrade of outdoor dining venues: tables, outdoor furniture, chairs, grill, or smoker.
			+ Ongoing supplies necessary for COVID mitigation: reusable trays for HDM participants.
		3. Partial Utilization of Funds:

If a meal provider/site declines the funding in whole or part, the AAA may develop a process/policy to document the distribution of the un-needed funding to other meal providers. This can be done broadly or to specific meal providers/sites that have requests to purchase one-time large items. For Example: If meal site A only plans on buying a freezer for $3,000 and meal site B would like to buy a HDM van and requests an additional $5,000; the AAA can transfer funding originally allocated to Recipient A to help recipient B.

The ICOA Nutrition Program Specialist must receive a copy of the AAAs process/policy and receive notification of the transfers.

* 1. **Remaining Funds:**

Subtracting the modernization funds from the AAA distribution amount, the ARPA Budget 2024 table below shows the remaining funds. Each AAA must divide these remaining funds through the number of meal providers/centers they serve in their area equally. That final amount reflects the final amount that each provider may utilize for purchasing food and sanitation material. It is also allowable to combine the remaining funds and Modernization Funds for a large modernization project.

* 1. **Carryover Funds**: Carryover ARPA Funds may be spent to support C1 and C2 meals.

* 1. **Budget:**

The ARPA funds will be included as a line item in your budget sheet, only to capture expenditures.

AAAs are responsible to notify each meal provider/center about available funding.



* 1. **Fiscal Guidance:**
		1. The ICOA Nutrition Program Specialist will request documentation on all expenditures per meal site, by the end of January 2024 and again by the end of April 2024 after the grant closes out. AAAs need to pay meal providers/sites within 30 days of receiving an invoice for reimbursement. The AAAs must invoice ICOA by the 25th of the month.
		2. Labor costs, rent and utilities are not allowable costs.
		3. Prepay: If an item needs to be prepaid, that would be allowed if corresponding documents verify this. Those documents should include an agreement to pay back funds in case the deal for the prepaid items falls through.
		4. Area III has a multi-senior center food distributor providing services to meal sites, Metro Community Services (MCS). MCS contracted meal sites will receive modernization funding. MCS may be involved in consultation of recommended improvements. AAA will make payments directly to each Meal site under MCS.
		5. If a meal site terminates their contract with the AAA or with the contracted party that receives nutrition funding from the AAA in the first three years, the AAA may choose to revert ownership of those durable goods with value over $1000 to support other AAA contracted senior nutrition sites.

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| Subject | **Title III E American Rescue Plan Act Funding** | No. | TG.AD.13.3 |
| Effective Date | 07/01/2021 | Version No | 02 |
| Contact | Lynn Fyanes | Contact Info | 208-577-2852 |
| Version History |
| Version | Revision Date | Description of Change | Author |
| 2 | 05/24/2022 | Clarified Home Modification, added Caregiver Meals, removed Homemaker services.  | Vicki Yanzuk |
| 3 | 09/20/2022 | Add Secondary Priority Use of Funding in Year 2 | Vicki Yanzuk  |

## Purpose of Funding:

Title III E funding is designed to meet the State Plan goal and objective to assist older Idahoans live as independently as possible and provide caregiver training and resources. ARPA funding is further designed to implement targeted caregiver programs to address high level needs, unhealthy living conditions, and alleviating negative health effects due to long-term stay-at- home recommendations. Funding should be targeted to prevention and mitigation activities related to COVID 19 including:

* + 1. Counseling
		2. Respite Care
		3. Supplemental services
		4. Information Services

## Priority Use of Funding:

1. **Powerful Tools for Caregivers:**

Implement the evidenced based Powerful Tools for Caregivers program online or in-person. Funds can be used to purchase technology devices to allow participation by caregivers online. Funds for care recipient respite to allow caregivers to attend program meetings is allowed.

## Consumer Directed Respite:

Continue to plan, develop, and implement a consumer directed respite program.

## Extended Respite:

The AAA may offer extended respite hours to prevent individual caregiver burnout and alleviate the negative health effects due to stay at home recommendations. Determination should be based on documented need and individual authorization. Extended hours are not a blanket increase for all AAA respite recipients.

## Options Counseling:

Plan, develop, and implement an options counseling program.

## Caregiver education and outreach:

Develop targeted caregiver education and outreach materials focused on rural, minority, and culturally diverse populations. The AAA may also develop targeted caregiver outreach materials designed specifically to highlight AAA caregiver programs.

## Targeted Supportive Services:

Minor home modifications include items that are necessary to support the caregiver to facilitate the ability of older individuals to remain at home. These funds may not be utilized for ongoing routine services. Examples of allowable services include, but are not limited to:

* + Installing:
* Grab Bars
* Raised toilets
* Handheld showers
* Handrails
* Lever door handles
	+ Repair
* Railings
* Stairs

The AAA is required to develop a program process that addresses:

* + Leveraging local area volunteers, non-profits, and private industry to assist in service implementation.
	+ Internal review and authorization of services/goods. A client cap is not required by ICOA but AAAs must have a method to provide reasonable allotments and ensure funding distributions are reviewed with regularity.

**7. Caregiver Meals:**

Funding may be utilized for caregiver congregate and home delivered meals. Title III E meals must meet all OAA program and eligibility requirements. Meals for caregivers are tracked under ARPA Title III E Supplemental Services within the Budget Workbook.

## Year 2 Funding - Secondary Priority Use of Funding:

AAAs may utilize up to 80% of Year 2 ARPA Title B funds to meet demands on contracted services approved in the SFY 23 AAA Budget. This includes services the AAA has contracted under OAA Federal Title III and State Services Match such as routine Homemaker.

The AAA must develop a plan to monitor client enrollments and attrition rates. AAAs must ensure any increases in client service enrollments utilizing ARPA funding can decrease with natural attrition or other means without harm to clients. The AAA may also develop a plan and program to provide temporary service to clients. Clients must be aware of the service start and end dates if the AAA provides temporary services.

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| Subject | **Title III D American Rescue Plan Act Funding** | No. | TG.AD.13.4 |
| Effective Date | 07/01/2022 | Version No | 01 |
| Contact | Erin Olsen | Contact Info | 208-577-2853 |
| Version History |
| Version | Revision Date | Description of Change | Author |
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1. **Purpose of Funding:**

To provide health education opportunities to aging Idahoans and adults with disabilities, their adult family members, and caregivers in order to empower them to reduce the incidence and/or negative outcomes from chronic conditions and promote general health and well-being.

1. **Use of Funding:**

OAA Title IIID funds must be evidence-based programs (EVPs) to improve health and well-being and reduce disease and injury. ACL has designated programs that meet the established requirements. ICOA does not have additional ARPA specific requirements.

In accordance with program guidelines, the AAA should:

* Develop and maintain a community-based network that supports a sustainable program through relationships with partners who provide promotional, referral, monetary, staffing and logistical support.
* Provide regularly scheduled educational opportunities for target populations, facilitated by local leaders, that meet fidelity requirements.
* Provide program in which each PSA delivers workshops in at least five of their senior centers, with at least two in rural counties, and at least one delivered virtually each year.
* Manage program data using Workshop Wizard, an easy-to-use online application, with comprehensive, current information and the ability to secure, share, and report.
* Create a trust-worthy coalition between ICOA and program providers that encourages Collaboration and coordinated activities to optimize efforts and provide a robust, seamless statewide program.
* Create effective marketing materials that reach at-risk populations and utilize a variety of delivery mechanisms including social media, websites, print and televised media.