

Subject	Idaho Commission on Aging Policy for Transfer of Direct Service Funds		No.	
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**Acronyms:**

AAA – Area Agency on Aging  
 ICOA – Idaho Commission on Aging  
 OAA – Older Americans Act  
 SUA – State Unit on Aging

**Purpose:**

This policy establishes procedures for the Idaho Commission on Aging (ICOA), the State Unit on Aging (SUA) for the State of Idaho and Area Agency on Aging (AAA), regarding the transfer of direct service funds in accordance with the Older Americans Act (OAA) 45 CFR 1321.9 (c)(2)(iii).

**Scope:**

This policy applies to ICOA and AAAs when it is related to Title III funding under the OAA.

**Policy Statement:**

AAAs may request to transfer allowable portions of Title III service allotments when such transfers support the effective and efficient delivery of services to older adults. ICOA has the authority to approve or disapprove proposed transfers as part of the annual spending plan and transfer process. All transfers must comply with federal laws and waiver requirements established by the Assistant Secretary for Aging.

**Definitions:**

- **Assistant Secretary for Aging** – Oversees the Administration on Aging within the U.S. Department of Health and Human Services.
- **Direct Services** – Means any activity performed to provide services directly to an older person or family caregiver, groups of older persons or family caregivers, or to the general public by the staff or volunteers of a service provider, an area agency on

aging, or a state agency whether provided in-person or virtually. Direct services exclude State or area plan administration and program development and coordination activities.

**Requirements:**

1. ICOA must provide notification of the transfer amounts elected pursuant to guidance as set forth by the Assistant Secretary for Aging;
2. ICOA shall not delegate to an AAA or any other entity the authority to make a transfer;
3. Transfers may be unallowable if there are service waitlists;
4. AAAs may only elect to transfer between Title III, part B Supportive Services and Senior Centers, part C-1 Congregate Nutrition Services, and part C-2 Home-Delivered Nutrition Services grant awards;
  - a. AAAs may elect to transfer up to 40 percent between the Title III, part C-1 and part C-2 grant awards, per section 308(b)(4)(A) of the Act (42 U.S.C. 3028(b)(4)(A));
    - i. ICOA must request and receive approval of a waiver from the Assistant Secretary for Aging to exceed the 40 percent transfer limit.
    - ii. ICOA may request a waiver up to an additional 10 percent between the Title III part C-1 and part C-2 grant awards, per section 308(b)(4)(B) of the Act (42 U.S.C. 3028(b)(4)(B)).
  - b. AAAs may elect to transfer up to 30 percent between Title III, parts B and C, per section 308(b)(5)(A) of the Act (42 U.S.C. 3028(b)(5)(A)); and
    - i. ICOA must request and receive approval of a waiver from the Assistant Secretary for Aging to exceed the 30 percent limitation between parts B and C, per section 316(b)(4) of the Act (42 U.S.C. 3030c-3(b)(4));
5. Transfer percentage limitations apply to the ICOA, as the SUA, in aggregate. Percentages subject to transfer are calculated based on the total original Title III award allotted in Federal Fiscal year notice of award;
6. ICOA, in consultation with AAAs, shall:
  - a. Ensure the process used by the AAAs in transferring funds under this section (including requirements relating to the authority and timing of such transfers) is simplified and clarified to reduce administrative barriers; and
  - b. With respect to transfers between parts C-1 and C-2, direct limited resources to the greatest nutrition service needs at the community level;
7. ICOA does not have to apply equal limitations on transfers to each AAA.

**Procedures:**

1. AAAs may request transfers during the annual spending plan process at an interval set by ICOA.
2. ICOA will review transfer requests as part of the spending plan review process.
  - a. ICOA has the authority to approve or disapprove proposed transfer amounts for each AAA between Title III C1 and C2 funds up to the 40 percent transfer threshold and between Title III B and III C funds up to the 30 percent transfer threshold as part of the Area Plan review, approval, and completion process.
  - b. Requests to transfer amounts that are above the standard transfer thresholds are not permitted.

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