Policy Name	**Monitoring State Plan Assurances**	No.	25.03.PO
Effective Date	10/01/2025	Version No	01
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Version History			
Version	Revision Date	Description of Change	Author

Acronyms:

AAA – Area Agency on Aging
ICOA - Idaho Commission on Aging
OAA - Older Americans Act

Purpose:
In accordance with the Code of Federal Regulation (CFR) 45 Part 1321.9(c)(2)(xvii) and 1321.27(M) and Older Americans Act Section 307, to establish a policy and procedure to monitor compliance with the Idaho State Plan on Aging assurances.

Scope:
This policy applies to the Idaho Commission on Aging (ICOA) as the State Unit on Aging responsible for the administration of programs under the Older Americans Act (OAA).

Policy Statement:
In accordance with the Older American's Act, the ICOA is responsible to develop and implement a State Plan on Aging to meet the requirements established in Section 307 of the Act. The ICOA must attest to assurances under the act as part of the State Plan and monitor compliance.

Procedures:

Monitoring Process

1. **Identification:**

   Each required assurance is listed in column 1 of the table below. Column 2 provides the process, estimated timeframe, and documentation required to verify monitoring efforts.

2. **Frequency:**

   Monitoring is required by June 30th the final year of the state planning cycle.

3. **Table:**

State Agency Assurance – State Plan Guidance	Monitoring Process…ICOA will -
Provide assurances, satisfactory to the Assistant Secretary, that the State agency will take into account, in connection with matters of general policy arising in the development and administration of the State plan for any fiscal year, the views of recipients of supportive services or nutrition services, or individuals using multipurpose senior centers provided under such plan;	Document opportunities for public comment. Documentation will include the following: • Dates of opportunities for public comment • Type of opportunity: webinar, in-person, online document. If in-person, the location and facility. • Any comments received at each of those opportunities • ICOA response to the public comments
Provide assurance that preference will be given to providing services to older individuals with greatest economic need and older individuals with greatest social need (with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas), and include proposed methods of carrying out the preference in the State plan;	Develop an Intrastate Funding Formula with the assistance of stakeholders including Area Agencies on Aging and Commissioners that provides funding preference to planning and service areas with the greatest economic and greatest social need. The stakeholder processes will be documented to ensure input and preferences are considered. Ensure Idaho Administrative Procedures Act requires AAAs to focus outreach on individuals with the greatest economic and social need.
Provide assurances that the State agency will require use of outreach efforts described in section 307(a)(16);	ICOA will describe its outreach efforts to the following populations: • Older individuals residing in rural areas; • Older individuals with greatest economic need (with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas); • Older individuals with greatest social need (with particular attention to low-income older individuals, including low-

	income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas); • Older individuals with severe disabilities; • Older individuals with limited English-speaking ability; and • Older individuals with Alzheimer's disease and related disorders with neurological and organic brain dysfunction (and the caretakers of such individuals); of the availability of assistance under the OAA.
Provide an assurance that the State agency will undertake specific program development, advocacy, and outreach efforts focused on the needs of low-income minority older individuals;	Describe how it undertook specific program development, advocacy, and outreach efforts focused on the needs of low-income minority older individuals through developing the Area Plan instructions and special initiatives related to these efforts.
Provide assurance, determined adequate by the State agency, that the area agency on aging will have the ability to develop an area plan and to carry out, directly or through contractual or other arrangements, a program in accordance with the plan within the planning and service area.	Maintain and require use of the AAA Planning Manual which requires AAA to describe and demonstrate their ability to develop and carry out an area plan.
Provide assurances that an adequate proportion, as required under section 307(a)(2), of the amount allotted for part B to the planning and service area will be expended for the delivery of each of the following categories of services— *(A) services associated with access to services (transportation, health services (including mental and behavioral health services), outreach, information and assistance (which may include information and assistance to consumers on availability of services under part B and how to receive benefits under and participate in publicly*	Document expenditure levels for Minimum Adequate Proportion and document that expenditures reached at least minimum required levels through contract budgets with Area Agencies on Aging.

supported programs for which the consumer may be eligible), and case management services); *(B) in-home services, including supportive services for families of older individuals with Alzheimer's disease and related disorders with neurological and organic brain dysfunction; and* *(C) legal assistance;* *Assure the AAA will report annually to the State Agency in detail the amount of funds expended for each category*	
With respect to services for older individuals residing in rural areas— *(i) provide assurances that the State agency will spend for each fiscal year, not less than the amount expended for such services for fiscal year 2000;* *(ii) identify, for each fiscal year to which the plan applies, the projected costs of providing such services (including the cost of providing access to such services); and* *(iii) describe the methods used to meet the needs for such services in the fiscal year preceding the first year to which such plan applies.*	Document the amount that was spent each federal fiscal year for individuals residing in rural areas in the ICOA Annual Report. Those expenditure amounts will be compared to what the State spent on services for individuals living in rural areas in the required baseline period of the federal fiscal year 2000.
The plan shall provide satisfactory assurance that such fiscal control and fund accounting procedures will be adopted as may be necessary to assure proper disbursement of, and accounting for, Federal funds paid	Document the procedures used in the disbursement of, and accounting for, Federal funds paid to the State, including the processes for expenditure monitoring, process for approval of advance or reimbursable payments, and financial reconciliation.

under this title to the State, including any such funds paid to the recipients of a grant or contract.	
The plan shall provide assurances that— *(i) no individual (appointed or otherwise) involved in the designation of the State agency or an area agency on aging, or in the designation of the head of any subdivision of the State agency or of an area agency on aging, is subject to a conflict of interest prohibited under this Act;* *(ii) no officer, employee, or other representative of the State agency or an area agency on aging is subject to a conflict of interest prohibited under this Act; and* *(iii) mechanisms are in place to identify and remove conflicts of interest prohibited under this Act.*	Develop and update conflict-of-interest policies and procedures.
The plan shall provide assurances that— *(A) the State agency will carry out, through the Office of the State Long-Term Care Ombudsman, a State Long- Term Care Ombudsman program in accordance with section 712 and this title, and will expend for such purpose an amount that is not less than the amount expended by the State agency with funds received under this title for fiscal year 2019, and an amount that is not less than the amount expended by the State agency with funds received under title VII for fiscal year 2019; and* *(B) funds made available to the State agency pursuant to section 712 shall be used to supplement and not supplant*	Provide the amount of Title III funds that were spent during each federal fiscal year for the State's Long-Term Care Ombudsman program annually to the Administration for Community Living in comparison to 2019.

other Federal, State, and local funds expended to support activities described in section 712.	
The plan shall provide that with respect to legal assistance— *(A) the plan contains assurances that area agencies on aging will (i) enter into contracts with providers of legal assistance which can demonstrate the experience or capacity to deliver legal assistance; (ii) include in any such contract provisions to assure that any recipient of funds under division (i) will be subject to specific restrictions and regulations promulgated under the Legal Services Corporation Act (other than restrictions and regulations governing eligibility for legal assistance under such Act and governing membership of local governing boards) as determined appropriate by the Assistant Secretary; and (iii) attempt to involve the private bar in legal assistance activities authorized under this title, including groups within the private bar furnishing services to older individuals on a pro bono and reduced fee basis;* *(B) The plan contains assurances that no legal assistance* *will be furnished unless the grantee administers a* *program designed to provide legal assistance to older individuals with social or economic need and has agreed, if the grantee is not a Legal Services Corporation project grantee, to coordinate its services with existing Legal Services Corporation projects in the planning and service area in order to concentrate the use of funds provided under this title on individuals with the greatest such need; and the*	With the assistance of its Legal Assistance Developer, will describe and document how ICOA met requirements related to legal assistance.

area agency on aging makes a finding, after assessment, pursuant to standards for service promulgated by the Assistant Secretary, that any grantee selected is the entity best able to provide the particular services. *(D) The plan contains assurances, to the extent practicable, that legal assistance furnished under the plan will be in addition to any legal assistance for older individuals being furnished with funds from sources other than this Act and that reasonable efforts will be made to maintain existing levels of legal assistance for older individuals; and* *(E) The plan contains assurances that area agencies on aging will give priority to legal assistance related to income, health care, long-term care, nutrition, housing, utilities, protective services, defense of guardianship, abuse, neglect, and age discrimination.*	
The plan shall provide, whenever the State desires to provide for a fiscal year, services for the prevention of abuse of older individuals *(A) the plan contains assurances that any area agency on aging carrying out such services will conduct a program consistent with relevant State law and coordinated with existing State adult protective service activities for—* *(i) public education to identify and prevent abuse of older individuals;* *(ii) receipt of reports of abuse of older individuals;* *(iii) active participation of older individuals participating in programs under this Act through outreach, conferences,*	Demonstrate Adult Protective Services State activities through data and funding information.

and referral of such individuals to other social service agencies or sources of assistance where appropriate and consented to by the parties to be referred; and *(iv) referral of complaints to law enforcement or public protective service agencies where appropriate;*	
The plan shall provide assurances that each State will assign personnel (one of whom shall be known as a legal assistance developer) to provide State leadership in developing legal assistance programs for older individuals throughout the State.	Contract with the Legal Assistance Developer annually.
The plan shall provide assurances that, if a substantial number of the older individuals residing in any planning and service area in the State are of limited English-speaking ability, then the State will require the area agency on aging for each such planning and service area— *(A) to utilize in the delivery of outreach services under section 306(a)(2)(A), the services of workers who are fluent in the language spoken by a predominant number of such older individuals who are of limited English-speaking ability; and* *(B) to designate an individual employed by the area agency on aging, or available to such area agency on aging on a full-time basis, whose responsibilities will include—* *(i) taking such action as may be appropriate to assure that counseling assistance is made available to such older individuals who are of limited English-speaking ability in*	Document and describe its guidance to the AAAs in those PSAs related to engagement of individuals with limited English-speaking ability.

order to assist such older individuals in participating in programs and receiving assistance under this Act; and *(ii) providing guidance to individuals engaged in the delivery of supportive services under the area plan involved to enable such individuals to be aware of cultural sensitivities and to take into account effectively linguistic and cultural differences.*	
The plan shall provide assurances that the State agency will require outreach efforts that will— *(A) identify individuals eligible for assistance under this Act, with special emphasis on—* *(i) older individuals residing in rural areas;* *(ii) older individuals with greatest economic need (with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas);* *(iii) older individuals with greatest social need (with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas);* *(iv) older individuals with severe disabilities;* *(v) older individuals with limited English-speaking ability; and*	Describe how it required outreach efforts to identify populations and helped make them aware of services available under the Act.

(vi) older individuals with Alzheimer's disease and related disorders with neurological and organic brain dysfunction (and the caretakers of such individuals); and *(B) inform the older individuals referred to in clauses (i) through (vi) of subparagraph (A), and the caretakers of such individuals, of the availability of such assistance.*	
The plan shall provide, with respect to the needs of older individuals with severe disabilities, assurances that the State will coordinate planning, identification, assessment of needs, and service for older individuals with disabilities with particular attention to individuals with severe disabilities with the State agencies with primary responsibility for individuals with disabilities, including severe disabilities, to enhance services and develop collaborative programs, where appropriate, to meet the needs of older individuals with disabilities.	Describe how it is coordinating planning to meet the needs of individuals with severe disabilities with the State agency with primary responsibility for serving this population.
The plan shall provide assurances that area agencies on aging will conduct efforts to facilitate the coordination of community-based, long-term care services, pursuant to section 306(a)(7), for older individuals who— *(A) reside at home and are at risk of institutionalization because of limitations on their ability to function independently;* *(B) are patients in hospitals and are at risk of prolonged institutionalization; or*	Document its guidance to AAAs on facilitating coordination of community-based long-term care services for these populations.

(C) are patients in long-term care facilities, but who can return to their homes if community-based services are provided to them.	
(19) The plan shall include the assurances and description required by section 705(a).	Describe compliance with assurances listed in the Older Americans Act section 705(a).
(20) The plan shall provide assurances that special efforts will be made to provide technical assistance to minority providers of services.	Describe its activities related to providing technical assistance to minority providers of services.
(21) The plan shall— *(A) provide an assurance that the State agency will coordinate programs under this title and programs under title VI, if applicable; and* *(B) provide an assurance that the State agency will pursue activities to increase access by older individuals who are Native Americans to all aging programs and benefits provided by the agency, including programs and benefits provided under this title, if applicable, and specify the ways in which the State agency intends to implement the activities.*	Describe its coordination activities with Title VI grantees and its work to increase access by older individuals who are Native Americans to all aging programs.
(22) If case management services are offered to provide access to supportive services, the plan shall provide that the State agency shall ensure compliance with the requirements specified in section 306(a)(8).	Describe and document case management activities annually in the ICOA Annual Report.

(23) The plan shall provide assurances that demonstrable efforts will be made— *(A) to coordinate services provided under this Act with other State services that benefit older individuals; and* *(B) to provide multigenerational activities, such as opportunities for older individuals to serve as mentors or advisers in child care, youth day care, educational assistance, at-risk youth intervention, juvenile delinquency treatment, and family support programs.*	Describe its activities to coordinate OAA services with other state services that benefit older individuals as well as any multigenerational activities.
(24) The plan shall provide assurances that the State will coordinate public services within the State to assist older individuals to obtain transportation services associated with access to services provided under this title, to services under title VI, to comprehensive counseling services, and to legal assistance.	Document its efforts to help older individuals to obtain transportation services annually in the ICOA Annual Report.
(25) The plan shall include assurances that the State has in effect a mechanism to provide for quality in the provision of in-home services under this title.	Describe how it is measuring quality in the provision of in-home services such as chore and homemaker.
(26) The plan shall provide assurances that area agencies on aging will provide, to the extent feasible, for the furnishing of services under this Act, consistent with self-directed care.	Document how AAAs are incorporating self-directed care into service planning and delivery in the management information system.
(30) The plan shall contain an assurance that the State shall prepare and submit to the Assistant Secretary annual reports that describe—	Submit annual reports as required by the Administration for Community Living.

(A) data collected to determine the services that are needed by older individuals whose needs were the focus of all centers funded under title IV in fiscal year 2019; *(B) data collected to determine the effectiveness of the programs, policies, and services provided by area agencies on aging in assisting such individuals; and* *(C) outreach efforts and other activities carried out to satisfy the assurances described in paragraphs (18) and (19) of section 306(a).*	