Subject	**Idaho Commission on Aging Policy for Program Development and Coordination**	No.	01
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Review Date			

Version History			
Version	Revision Date	Description of Change	Author

Acronyms:

AAA – Area Agency on Aging
ICOA – Idaho Commission on Aging
OAA – Older Americans Act
PD&C – Program Development and Coordination
SUA – State Unit on Aging

Purpose:

This policy establishes the requirements for the use of Title III funds for Program Development and Coordination (PD&C) activities by the Idaho Commission on Aging (ICOA) as the State Unit on Aging (SUA) and Area Agencies on Aging (AAA) as required by the Older Americans Act (OAA), 45 CFR 1321.27(h).

Scope:

This policy applies to the ICOA and all AAAs. It provides guidance and requirements for the use of Title III funds for PD&C activities.

Policy Statement:

ICOA shall ensure that any PD&C activities funded under Title III comply with federal requirements and directly support the enhancement of services for older adults and caregivers. AAAs must adhere to this policy.

Definitions:

- **Program Development and Coordination** – Improving services for older adults and caregivers through coordinated planning and collaboration with community providers.

- **Supportive Services (Title III-B)** – Services that assist older adults in maintaining independence in their homes and communities.

Requirements:

1. Administrative Spending Threshold

ICOA certifies not to authorize the use of Title III-B funds for PD&C activities under Area Plans until each AAA has expended 10% of its federal administrative budget on the administration of Area Plans, as required by OAA, and 25% of the state match and any additional funding.

ICOA will verify when the threshold has been met through the reconciliation of the spending plan. Funds for PD&C will not be released to any AAA until this threshold is satisfied.

2. Allowable Funding Types:

PD&C expenditures may only be charged to:

- State Plan Administration
- Area Plan Administration
- Title III-B Supportive Services

No other Title III funding types may be used for PD&C. AAA must provide an annual cost in the Area Plan proposal.

3. Public Review Process:

All PD&C activities proposed by AAAs must be included in their Area Plans. Each AAA shall:

- Describe proposed PD&C activities, expected outcomes, and the justification for using Title III-B funds.
- Include PD&C activities in the Area Plan budget and narrative.
- Submit the proposed PD&C activities for public review and comment as part of the Area Plan development process.

4. Service Enhancement Requirement:

All PD&C expenditures must demonstrate a direct and positive impact on services for older adults and family caregivers.

AAAs must provide written justification for each PD&C expenditure in their Area Plan.

5. Monitoring

ICOA will review PD&C expenditure during annual monitoring to ensure:

- Compliance with CFR 1321.27(h)
- Documentation of public input
- The AAA must report PD&C outcomes and associated budget details in each annual Area Plan update
- All PD&C costs must be tracked as a distinct line item within the AAA budget