Subject	**Idaho Commission on Aging Policy for Minimum Adequate Proportion for Priority Services**	No.	26.07.PO
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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
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 minimum adequate proportion for priority services as required by the Older Americans Act (OAA), Section 212, and 45 CFR 1321.3 (Definitions) and 1321.9(c)(2)(v).

Scope:

This policy applies to the ICOA and all AAAs when related to Title IIIB supportive services.

Policy Statement:

ICOA established this policy to ensure consistent statewide implementation of the OAA minimum adequate proportion requirements for Title IIIB priority services. All AAAs shall plan, budget, and expend Title IIIB funds in accordance with the minimum percentage thresholds for Access Services, In-Home Services, and Legal Assistance, while maintaining transparent, accurate, and timely financial reports to show adherence to these requirements.

Definitions:

- **Fiscal Year** – Means the Federal fiscal year.
- **Title IIIB Services** – Refers to Supportive Services are federally funded programs under the OAA designed to help older adults live independently in their homes and communities by providing a range of supportive services.

Requirements:

1. The following general principles apply to minimum percentages which must be spent on Title IIIB services:

a. Services associated with access to services transportation, 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 supported programs for which the consumer may be eligible) and case management services;
b. In-home services, including Homemaker, Chore, Respite and other supportive services for families of individuals with Alzheimer's disease and other neurological and organic brain disorders of the Alzheimer's type; and
c. Legal assistance

2. The minimum percentages are established as follows (information pulled from ICOA State Plan 2025-2028):

a. Minimum 15% of Title IIIB allocation for Access Services;
b. Minimum 5% of Title IIIB allocation for In-Home Services; and
c. Minimum 3% of Title IIIB allocation for Legal Assistance.

3. Each year the AAAs prepare a spending plan that meets the allocation of resources as stated above.

4. ICOA approves each AAA plan prior to the state fiscal year (July 1st through June 30th). ICOA monitors monthly reimbursements and conducts annual financial reviews to ensure expenses are being used and accounted for correctly. ICOA requires AAAs and their Advisory Boards to sign a Spending Plan assurance as part of their yearly Intrastate funding allocation that states the following:

a. We assure the projected spending plan provided represents accurate and transparent cost estimates and data units developed using the best available data.
b. We assure the spending plan aligns with our Area Plan goals and objectives to facilitate outcome achievement.
c. We assure the spending plan aligns with the State Plan goals and objectives to support Idaho's Aging Network in meeting statewide outcomes.
d. We assure we have developed the spending plan to address required funding parameters as outlined within the workbook and the ICOA Operations Manual.
e. We understand the funding estimates provided with the workbook are iterative. More funding may be provided through the Older Americans Act or the State of Idaho. We also understand funding may be reduced by either source.

f. We assure that the advisory board will be a source of accountability and guidance through the spending plan year.

Procedures:

1. AAAs must show in their Area Plan spending plan the percentage of Title IIIB funds they intend to allocate to each of priority services.

2. AAAs must also report their actual expenditures throughout the Area Plan year using standard financial reporting processes.