

Subject	Idaho Commission on Aging Policy for Private Pay Programs		No.	Draft
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Version	Revision Date	Description of Change	Author	

Acronyms:

AAA – Area Agency on Aging

ICOA – Idaho Commission on Aging

OAA - Older Americans Act

Purpose:

The purpose of this policy is to establish the requirements for Area Agencies on Aging (AAAs) for private pay programs in accordance with 1321.9(c)(2)(xiii).

Scope:

This policy applies to AAAs.

Policy Statement:

Idaho Commission on Aging (ICOA) supports the use of private pay programs to expand service options for older adults while maintaining equitable access to Title III funded services. All private pay programs must promote equity, fairness, and inclusion. Because private pay programs are a form of contracts and commercial relationships, they are also subject to Idaho Commission on Aging Policy and Procedure for Prior Approval of Section 212 Agreements.

D **Private pay programs** – as used in section 306(g) of the Act (42 U.S.C. 3026(g)), are a type of contract or commercial relationship and are programs, separate and apart

Definitions: programs funded under the Act, for which the individual consumer agrees to pay to receive services under the programs.

Requirements:

1. Private pay programs should be conducted in a fair and transparent manner.

2. AAAs are permitted to use Title III administrative funds or program development and coordination funds to develop private pay programs consistent with ICOA policies. This may include reimbursing Title III and demonstrating a return on investment for Older Americans Act (OAA) and Idaho State Senior Services Act programs.
3. Regardless of if Title III funding is initially used to develop the private pay program, an AAA contract to provide services through private pay program must have ICOA's prior approval as described in Idaho Commission on Aging Policy and Procedure for Prior Approval of Section 212 Agreements.
4. AAAs offering private pay programs must comply with the Idaho Commission on Aging Policy on Conflict of Interest.
5. AAAs offering private pay programs must meet financial accountability requirements.
6. An individual who receives information about private programs and who are eligible for services provided with Title III funds and any similar supported service options, even if there is a waiting list for those services, on an initial and periodic basis to allow individuals to determine whether they will select supported services or private pay programs.
7. AAAs are prohibited to use funds for direct services under Title III to support provision of service via pay programs, except as a part of routine information and assistance or case management referrals.

Procedures:

AAAs must follow procedures for developing and obtaining prior approval for private pay programs as outlined in Idaho Commission on Aging Policy and Procedure for Prior Approval of Section 212 Agreements.