

Subject	Idaho Commission on Aging Policy for Fixed Amount Subawards		No.	Draft
Effective Date			Version No	01
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

Purpose:

The purpose of allowing fixed amount subawards up to the simplified acquisition threshold is to streamline administrative oversight by tying payments to clearly defined deliverables rather than actual costs incurred. This approach supports efficient, performance-based funding consistent with 45 CFR 1321(c)(2)(xix), 2 CFR 200.201 and 200.332.

Scope:

This policy applies to non-state or governmental Area Agencies on Aging (AAAs) staff that are involved in the planning, issuance, monitoring, and closeout of subawards funded by federal or pass-through federal sources.

Policy Statement:

Fixed amount subawards may be issued up to the simplified acquisition threshold when doing so aligns with program objectives and regulatory requirements. All fixed amount subawards must be documented, justified, and managed in accordance with applicable federal regulations, internal controls, and organizational grant management practices to ensure accountability and compliance. This policy does not apply to contracts as defined by 45 CFR 1321.

Definitions:

- **Fixed amount award** – means a type of grant or cooperative agreement pursuant to which the Federal agency or pass-through entity provides a specific amount of funding without regard to actual costs incurred under the Federal award. This type of Federal award reduces some of the administrative burden and record-keeping requirements for both the recipient or subrecipient and the Federal agency or pass-through entity. Accountability is based primarily on performance and results.

- **Subaward** – means an award provided by a pass-through entity to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of a Federal award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria in 200.331, including an agreement the pass-through entity considers a contract.

Requirements:

- The AAAs shall follow all applicable Federal and State standards when awarding subgrants and contracts.
- AAAs must have ICOAs permission to issue subawards per the Performance Based Agreement.
- Fixed amount subawards up to the simplified acquisition threshold are permitted.
- All procurement procedures, including those involving fixed amount subawards, must incorporate free and open competition as intended by the Older Americans Act (OAA) and 2 CFR 200.
- ICOA or AAAs may use fixed amount awards when:
 - The project scope includes measurable goals and objectives.
 - Accurate cost, historical, or unit pricing data is available to establish a fixed budget based on a reasonable estimate or actual costs.
- Fixed amount awards may not be used in programs that require cost sharing.
- At the end of a fixed amount award, the recipient or subrecipient must certify in writing to the ICOA that:
 - The project was completed as agreed to in the Federal award or identify those activities that were not completed.
 - All expenditures were incurred in accordance with 200.403.
- All fixed price contracts must follow procurement guidelines as set forth in the ICOA Operations Manual.