

## MEMO

**To:** Area Agencies on Aging

**From:** Vermont State Unit on Aging, Department of Disabilities, Aging and Independent Living

**Date:** April 9, 2020

**Re:** Older Americans Act Programmatic and Fiscal Guidance due to Major Disaster Declaration and Supplemental Funding through the CARES Act

---

### **Major Disaster Declaration:**

On Monday, April 6, Governor Scott requested a declaration of a “major disaster” from FEMA due to Vermont’s COVID-19 crisis. With approval of this declaration, Section 310(c) of the Older Americans Act permits states to use any portion of the funds made available under any and all sections of the Act for disaster relief for older individuals. Flexibility is provided for states, without the need for a separate application, transfer request, or request for a waiver, to use existing allocations already made under Title III-B, C-1, C-2, D, and E for disaster relief.

This means that Area Agencies on Aging (AAAs) may use Title III-B, C-1, C-2, D, and/or E funds for any disaster relief activities or services for older individuals or family caregivers served under the OAA in your service area, which may include, but are not limited to:

- providing drive through, take out, or home-delivered meals (more on nutrition services below)
- providing well-being checks via phone or virtual means, and
- providing homemaker, chore, grocery/pharmacy/supply delivery, or other essential services.

For example, as part of your COVID-19 disaster relief activities, a AAA may use:

- funding originally allocated under Title III-C-1 to provide take-out meals, and
- funding originally allocated under Title III-D to conduct daily phone well-being checks.

AAAs must be prepared to track COVID-19 related expenditures using Title III funding as well as the number of persons and units served.

The SUA recommends that for your records, specific fiscal and program reporting of funds reallocated for disaster relief be identified as “COVID-19” with notes that describe what was provided and what services were initially planned, but not provided.

**Expenditures:**

All States have been provided a no-cost-extension for the FFY 2019 Title III, Title VII, and NSIP grants. The project period end dates have been extended to September 30, 2021 with final reporting due to ACL December 30, 2021.

Funding under the Families First and CARES Act Supplementals have a project period until September 30, 2021, with final liquidation available until December 30, 2021.

Because the Families First and CARES Act funding is specifically appropriated for COVID-19 response, the SUA encourages the use of funding in the following order:

- Families First Coronavirus Response Act funding
- CARES Act funding
- “Regular” Title III grant funds, starting with the oldest funds available first:
  - FFY2019
  - FFY2020

In addition:

- Service Match (Title IIIC-1 Congregate and Title IIIC-2 Home Delivered Meals) is not required for the FFCRA or CARES Act supplemental grants; i.e. 15% service match and 1/3 of 15% State Match for Services.
- Retroactive fund transfers are not allowed on FFY19 Title III Federal Awards.

**Expenditure Reporting:**

For budget purposes, we are asking that AAAs be able to break out “regular” Title III expenditures from Title III expenditures related to “COVID-19”. This may mean a separate spreadsheet is used to track the separate funding sources (Families First, CARES Act, “regular” Title III. The Federal Reports that are submitted for the Families First, CARES Act, and “regular” Title III funding will be separate so it’s very important to keep those expenditures separate in your accounting systems.

**Nutrition Programs – Flexibilities and Recommendations:**

In addition to being able to transfer 100% of funds from C-1 to C-2, the following flexibilities are approved for the OAA nutrition programs:

- “Home-bound” includes individuals practicing social distancing.
- Waiver of DRI/DGAs (Daily Required Intake/Dietary Guidelines for Americans) for disaster relief meals, though it is highly encouraged to provide nutritious meals as much as possible. At a minimum, a meal must meet one-third of daily caloric intake for an older adult.

- These flexibilities apply to funding awarded under the CARES Act (Supplemental #3), the Families First Response Act (Supplemental #2), and regular OAA for the duration of the public health emergency.

#### Recommended Funding Uses:

- The simplest option for most AAAs to spend the funding, track and report on usage, support the meal providers, and reach the most people with meals is to increase the meal reimbursement rate for meal providers. A higher reimbursement rate will help stabilize meal provider programs and cover additional costs to increased meal production (supplies, equipment, staffing, etc.), and it keeps the expenditures tied closely to meal production. For example, if the current reimbursement rate is \$5/meal, consider a temporary \$10/meal during the crisis.
- Apply the higher reimbursement rate to include all meals served as of 3/16/20 (date that VDH and DAAL recommended senior centers close).
- Reimburse for all meals provided on and after 3/30/20 to the spouse, regardless of age of an eligible individual; individuals under 60 years of age with a disability, who reside with an eligible individual; and individuals with disabilities who are not older individuals but who reside in housing facilities occupied primarily by older individuals at which congregate nutrition services were provided on or before 3/16/20.
- Provide more than one meal per day to participants who are at greatest risk. Use the home delivered meals prioritization tool, need for support with ADLs and IADLs, lives alone and/or presence of an underlying condition to identify those at greatest risk.
- Purchase frozen and shelf-stable meals to meet gaps, relieve meal site pressures or loss of production capacity.
- Storage and freezer space rental.
- Provide mileage reimbursement to volunteer meal delivery drivers.
- Contract for transportation and delivery of meals.
- Pay for meal packaging equipment for sites – sealers, film and trays.
- Pay for meal delivery equipment – thermal bags, coolers, chill packs, heating/cooling units, thermometers.
- Pay for meal delivery PPE supplies – gloves, masks, sanitizer, bags.
- Do outreach to ensure those who may now be homebound due to social distancing are aware of the AAA and the availability of home delivered meals as an option and are able to participate.

This list is not meant to be exhaustive. Additional uses may be allowable. Please note that for all expenditures of the Families First and CARES Act funding, the focus must be on disaster relief and expenditures tied to disaster relief.



**Contacts:**

If you have questions regarding the information shared in this memo, please reach out to us.

- For general questions: Angela Smith-Dieng, [angela.smith-dieng@vermont.gov](mailto:angela.smith-dieng@vermont.gov), 802-989-0454.
- For nutrition questions: Mary Woodruff, [mary.woodruff@vermont.gov](mailto:mary.woodruff@vermont.gov), 802-760-9951
- For financial questions: Jordan Goodwin, [Jordan.goodwin@vermont.gov](mailto:Jordan.goodwin@vermont.gov), 802-279-2365 (personal cell)

We anticipate that ACL will be providing more programmatic and fiscal guidance to states in the days and weeks to come. Thank you for your patience in this process and as the situation changes.

Thank you for all you are doing for older Vermonters during COVID-19. All of us at DAIL truly appreciate your hard work, dedication and partnership.