Area Agencies on Aging Broadcast 2021-09

Date: October 19, 2021

To: AAA Directors
   Executive Directors
   AAA Finance Directors

From: Office of Area Agencies on Aging

Subject: 1. Notice of Funding Available – American Rescue Plan Act
          2. Closeout Preparation

This information is shared with Area Agencies on Aging (AAA) Directors, Executive Directors and AAA Finance Directors. Distribute to all staff and contractors as deemed necessary.

Please direct any questions regarding the information in this broadcast to the AAA Help Desk (AAA.Help@hhsc.state.tx.us).

All broadcasts are posted on the following website:

AAA Communications | Texas Health and Human Services

1. Notice of Funding Available – American Rescue Plan Act

Background

The American Rescue Plan (ARP) Act of 2021 provides additional funding to address the continued impacts of COVID-19 under the Older Americans Act (OAA) for the following grant awards:

- Title III B Support Services,
- Title III C-1 Nutrition Service Congregate,
- Title III C-2 Nutrition Service Home Delivered Meals,
- Title III D Disease Prevention & Health, and
ARP Awards

The ARP funds are available for use for **Allowable Activities** (below) through September 30, 2024. The funds will be distributed using the existing funding formula and divided and awarded in the next three federal fiscal years (FFY) starting FFY 2022 until FFY 2024.

The ARP Act did not waive the match requirement for services or administration. Unlike the other COVID-19 supplement funds, service match is required for Title III B, C-1, C-2 and E. In addition, the AAAs will be awarded Administrative funds.

However, the Administration for Community Living (ACL) is allowing Program Income to be used to meet the service match requirement for the ARP funds only. It can only be used to meet the service match requirement for the specific ARP grant award (i.e., program income generated using ARP Title III C-1 funds cannot be used to match Title III C-1 but can be used to match ARP Title III C-1).

The ARP Program Income must continue to be used to expand the services for which the income was collected. The AAAs must develop clear policies and procedures to account for and document the Program Income used to meet the ARP service match requirement.

In addition, the ARP funds can be bucketed (Disaster Flex) with other OAA funds during the period of the Major Disaster Declaration (MDD) period and, as allowed under the Public Health Emergency (PHE), AAAs can transfer 100 percent between C-1 and C-2 ARP funds.

ARP Allowable Activities

**Title III B Supportive Services**

- Currently allowable Supportive Services under the Older Americans Act (OAA).
- Efforts for COVID-19 vaccination and booster shots outreach:
  - Addressing vaccine hesitancy, and
  - Addressing vaccine equity.
- Transportation vouchers.
- Planning/organizing vaccination activities.
● Efforts to support access to the COVID-19 vaccination and booster shots, including education, communication, transportation, and other activities.
● Activities to support prevention and mitigation of extended social isolation, including investments in technological equipment and strategies to alleviate the negative health effects of long-term stay-at-home recommendations.

**Title III C Nutrition Services**

To provide currently allowable services under the Title III C Congregate Meal Program and the Home Delivered Meal Program.

**Title III D Evidence Based Health Promotion and Disease Services**

To provide currently allowable services under the Title III D Evidence Based Intervention programs which must continue to meet ACL’s criteria for evidence-based health promotion and disease prevention programs.

**Title III E Caregiver Support Services**

To provide currently allowable services under the Title III E program; in addition to efforts to support Older Relative Caregivers who need assistance accessing the COVID-19 vaccinations for their grandchildren.

**Major Disaster Declaration (MDD)**

Texas continues to have an approved MDD which allows for the flexibilities to bucket funds for disaster relief and is applicable to the ARP funds. Bucketing funds is not considered a transfer. The MDD provides the ability to designate funds as disaster relief (Disaster Flex) and spend them in response to the identified needs out of any Part of the Act.

Under the approved MDD, Older Americans Act (OAA) funds may be bucketed and used for any disaster related services without regard to the OAA program for which the funds were appropriated. This includes regular Title III funds and the supplemental COVID-19 funds provided through federal legislation, which include Families First Coronavirus Response Act (FFCRA), Coronavirus Aid, Relief and Economic Security (CARES) Act, Consolidated Appropriations Act (CAA) and ARP Act.
Public Health Emergency (PHE)

The ARP Act also extends certain flexibilities to some of the OAA nutrition requirements, which currently applies to the regular OAA Title III funds and supplemental COVID-19 funds provided under FFCRA, CARES, and CAA.

The following flexibilities remain in effect for the duration of the PHE:

- **Home-Delivered Nutrition Services Waiver**
  - Allows a person who is practicing social distancing be considered homebound.

- **Dietary Guidelines Waiver**
  - Waives the nutritional dietary guidelines for OAA funded meals (except meals reported as Nutrition Services Incentive Program (NSIP)).

ARP also extends the FFCRA and CARES Act ability to transfer up to 100 percent of ARP funds between Title III C-1 and C-2 until August 15, 2022 or the end of the PHE, whichever is sooner.

After the PHE ends, regular categorical transfer limits apply of up to 40 percent between Title III C-1 and C-2. Transfers must occur within the same grant grouping (i.e., ARP transfers must occur within the ARP grant).

**Categorical Transfers**

Requests for categorical transfers are no longer available for the following funds:

- FFY 2020 Regular Title III,
- FFY 2021 Regular Title III,
- FFCRA, and
- CARES Act.

In addition, regular categorical transfer limits of up to 30 percent apply to requests for transfers between Title III-B and Title III-C.

**Adequate Proportion**

As required under Texas Administrative Code §213.153(k), the minimum proportion of funds requirement applies to the ARP funding.
Notice of Funding Available

The Notice of Funds Available (NFA) notification for the ARP Title III and Title VII grants will be released today Tuesday, **October 19, 2021**.

The ARP NFAs have been placed on the Secure File Transfer Protocol (SFTP) site in the folder labeled **2022 NFA**. Each AAA will find an NFA in their respective folder.

The 2022 Request for Payment (RfP) and Request for Adjustment Journal (RfAJ) templates (version 1.0) is published on the SFTP site and available to use with the Monday Due Date (MDD) **October 25, 2021**.

Reporting

The ARP funds must be tracked and reported as a separate grant using the following fund identifiers:

- American Rescue Plan Title III-B
- American Rescue Plan Title III-C1
- American Rescue Plan Title III-C2
- American Rescue Plan Title III-D
- American Rescue Plan Title III-E
- American Rescue Plan Program Income

The AAAs have the option to use Program Income collected under the specific ARP grant award to be used to meet the ARP service match requirements.

As federally required, the detail of Program Income collected for regular Title III funds must be reported separately from Program Income collected for the specific ARP grant awards.

The Quarterly Performance Report (QPR) workbook will also be updated to allow the AAAs to include the detail of monthly Program Income collected for each service by specific ARP grant award. The detail of Program Income is to be reported as applied to the ARP service match requirement and as expended and applied to units of service in which the Program Income of the specific ARP award it was generated from.

**SPURS Updates**

The ARP fund were added to SPURS expanding the existing fund options for AAAs.
To add the new *ARP* fund identifier in SPURS for one or more services, AAAs must make the following selections to each provider record:

1. In the **Administrator – Providers** screen, use the **Add New** action.
2. In the **Services** drop-down menu, choose the appropriate service.
3. Enter the start date of 10/01/21. **Do not enter a date prior to 10/01/21.**
4. Select the appropriate Fund Identifier for *ARP*.

**QPR Workbook Update**

The State Fiscal Year 22 QPR workbook will be updated and released on November 30, 2021.

**2. Closeout Preparation**

In preparation for the FFY2021 Closeout Reconciliation process, HHSC AES wants to remind the Area Agencies on Aging (AAAs) to begin submitting FFY2021 Request for Adjustment Journals (RfAJs) to expend prior year funds on Monday Due Date (MDD) 11/08/2021. This will assist HHSC and AAAs during the closeout review process by reducing resubmission requests and expediting the issuance of carryforward funds. The following can be used to assist the AAAs in deciding which funds to use in what order:

- FFY 2020 Title III, Title VII, & NSIP
- FFY 2021 Title III, Title VII & NSIP
- FFCRA Families First
- CARES
- Consolidated Appropriation
- CDC Vaccination
- American Rescue Plans

In addition, AAA should ensure the following Quarterly Performance Report (QPR) activities are completed:

- Corrections needed for previously submitted quarters are reflected in the Final Closeout column of the QPR for each month.
- RfAJ requests are reflected in the appropriate month of the Closeout QPR.
- QPR data for September 2021 do not reflect negative numbers or expenditures for state general revenue funds.