



COVID-19 Older Americans Act Families First, CARES Act and Major Disaster Declaration *Guidelines during Pandemic*

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This guidance is for Area Agencies on Aging (AAAs) on administration and reporting of the Families First Coronavirus Response Act (FFCRA), CARES Act, and implications of the Major Disaster Declaration on the Older Americans Act (OAA). Guidance is evolving throughout the crisis and will continue to be updated frequently.

Purpose of FFCRA and CARES Act Funding

Funds expended from the FFCRA and the CARES Act are to respond to the Coronavirus Emergency by providing OAA services related to the emergency. Funds must be expended on allowable OAA activities as defined by the OAA and State and local policy.

General Guidelines:

The order of funding for disaster relief services is strongly encouraged to be:

1. COVID-19 Families First Coronavirus Response Act (FFCRA) funds
2. COVID-19 CARES (Coronavirus Aid Relief and Economic Security) Act Funds (*to be awarded*)
3. Older Americans Act (OAA) Title III (*start with the oldest funds available first*)
 - a. FFY2019
 - b. FFY2020

Transfer Requests forms will need to be completed and submitted as usual – first request due no later than April 27; second request due no later than June 27 and the final request due no later than July 27, 2020.

Program income rules still apply and per 45CFR75, program income must be expended prior to drawing additional federal funds. Additionally, FFCRA, the CARES Act, and the regular OAA Title III funding should be accounted for and reported separately, which includes program income. Program income must be reported on financial reports under the grant award number in which funds were expended for the service. i.e. Title III E funds are paying for home delivered meals which would typically be paid out of C-2, the program income should still be reported under Title III E and not C-2.

AAAs are required to continue maintaining appropriate records and documentation to support the charges against the Federal awards. At minimum and where possible, AAAs and providers should be recording the number of clients to whom service is provided, the name or category of services provided, the number of unites of service provided, and the expenditure related to providing such services. ACL

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will be releasing additional information shortly on programmatic reporting requirements, therefore additional guidance will be provided by ODA at that time.

[ACL Fiscal FAQ: OAA Funding, FFCRA, CARES Act, and OAA Reauthorization \(April 8, 2020\)](#)

COVID-19 Families First Coronavirus Response Act Funds

[Legislation](#)

[ACL COVID-19 Response – Fiscal FAQ \(3/24/2020\)](#)

Information:

- Legislation was enacted on March 18, 2020.
- This legislation was issued under separate grant award numbers and therefore, funds must be accounted for separately from Title III OAA Funding.
- Notice of Grant Awards were sent to AAAs on April 1, 2020.
- Award period: March 18, 2020 through September 30, 2021.
- No dollars were kept at ODA for Administration
- ODA was required to use federally approved Intrastate Funding Formula in making allocations to AAAs.
- AAAs are required to utilize funding formulas to allocate funding to their Planning and Service Area (Policy 202.00).
- ~~AAAs should prioritize those funds to the most vulnerable consumers at the highest risk for malnutrition and hunger. AAAs are encouraged to use the Disaster Priority Levels established in WellSky for consumers to target highest need. Please use resources such as the [Center for Disease Control's Social Vulnerability Index](#) to assist in your analysis to fund areas with projected high needs.~~

Guidelines:

- Upon Receiving COVID-19 Families First Coronavirus Response Act funds, suspend the use of OAA Title III C-1 and Title III C-2 funding and use the supplemental funding from COVID-19 Families First Coronavirus Response Act first.
 - Service match is waived when using these funds.
- ~~AAAs should prioritize those funds to the most vulnerable consumers at the highest risk for malnutrition and hunger. AAAs are encouraged to use the Disaster Priority Levels established in WellSky for consumers to target highest need. Please use resources such as the [Center for Disease Control's Social Vulnerability Index](#) to assist in your analysis to fund areas with projected high needs.~~
- Meals purchased are not required to meet Dietary Reference Intakes (DRIs); however, ODA and ACL strongly encourage the use of DRIs and Dietary Guidelines for Americans (DGAs) to maintain health and manage chronic disease and should only be waived in cases of food supply issues. It is encouraged that meals still meet 1/3 caloric requirements for older adults.
 - Please note that this waiver of DRIs and DGAs only applies to Families First Response Act and CARES Act funding, and OAA Title IIIB emergency assistance funds.
 - Meals purchased not meeting the DRIs/DGAs requirements are not NSIP-eligible meals. See OAA FAQs on NSIP.

Reporting Requirements—WellSky A&D:

- Use the Fund Identifier “COVID-19 Families First Coronavirus Response Act” to identify the use of these funds in WellSky A&D.
- When using these funds for Congregate Meals (“carry-out”/ “grab-and-go”) – use the sub-service “COVID-19 Grab and Go Meals.”

- When using these funds for Home Delivered Meals – use the sub-service “COVID-19 Home Delivered Meals.”
- Reports on funding allocations, persons served, and units delivered can be pulled from WellSky to report to ACL.

COVID-19 CARES (Coronavirus Aid Relief and Economic Security) Act

[Legislation](#)

Information:

- Legislation was enacted on March 27, 2020.
- Funds should be received by ODA by or around April 15, 2020 and ODA will expedite their distribution.
- Funding for Title III includes III-B Supportive Services, III-C Nutrition Services and III-E Family Caregiver Support.
 - The legislation includes other OAA funding such as Elder Justice, LTCO and ADRC
- These funds are to be used for disaster assistance services.
- This legislation will be issued under separate grant award numbers and therefore funds must be accounted for separately from Title III OAA Funding.
- ODA will be required to use the federally approved Intrastate Funding Formula in making allocations to AAAs.
- Award period: TBD through September 30, 2021.

Guidelines (These are evolving based on guidance that is being updated by ACL as we get closer to the funds being made available):

- Service match is waived when using these funds.
- Meals purchased are not required to meet Dietary Reference Intakes (DRIs); however, ODA and ACL strongly encourage the use of DRIs and Dietary Guidelines for Americans (DGAs) to maintain health and manage chronic disease and should only be waived in cases of food supply issues. It is encouraged that meals still meet 1/3 caloric requirements for older adults.
 - Please note that this waiver of DRIs and DGAs only applies to Families First Response Act and CARES Act funding, and OAA Title IIIB emergency assistance funds.
 - Meals purchased not meeting the DRIs/DGAs requirements are not NSIP-eligible meals. See OAA FAQs on NSIP.

Reporting Requirements—WellSky A&D:

- Use the Fund Identifier “COVID-19 CARES B”, “COVID-19 CARES C”, or “COVID-19 CARES E” to identify the use of these funds in WellSky A&D.
- When using these funds for disaster assistance services use the sub-service that designates it is a COVID-19 disaster assistance service.
- Reports on funding allocations, persons served, and units delivered can be pulled from WellSky to report to ACL.

Major Disaster Declaration

[ACL Fiscal FAQ: Major Disaster Declaration](#)

Information:

- [Declaration](#) was made March 31, 2020 with an end date to be determined
- Award period remains unchanged.
- **Section 310(c) of OAA 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.**

- **Any open OAA grant awards (i.e., FFY 2019 or 2020)** Title III funds (B, C-1, C-2, D and E) ~~provided for Program Year 2020~~ can be spent across Titles for disaster relief.
- **ODA and AAAs are responsible for monitoring of these dollars and providing details on how funds are being spent across different titles.**
- **Transfers must occur within the same grant grouping, i.e. FFCRA transfers must occur within the FFCRA grants.**

This means that a AAA may use Title III-B, C-1, C-2, D, and/or E funds for any disaster relief activities for older individuals or family caregivers served under the OAA, which may include, but are not limited to:

- providing take out, or home-delivered meals,
- providing well-being checks via phone, in-person, or virtual means, and
- providing homemaker, chore, grocery/pharmacy/supply delivery, or other services.

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

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

However, AAA should be prepared to track:

- COVID-19 related expenditures using Title III-C-1 funding and number of persons and meals served and
- COVID-19 related expenditures using Title III-D funding and number of persons and units served

Reporting Requirements—WellSky A&D:

- In WellSky A&D when making entries related to disaster assistance use the fund identifier that matches where the funds originate from.
 - For example – if you are using Title III-D funds to pay for a grocery ordering and delivery assistance service you would use the fund identifier of Title III-D.
 - Each disaster assistance service needs to be paired with a corresponding subservice showing it is a COVID-19 disaster assistance service.
 - For example, the service grocery ordering and delivery assistance will have a subservice labeled “COVID-19 grocery ordering and delivery service.”
- If you need assistance with aligning fund identifiers, services, and/or subservices contact ODA.
- Reports on funding allocations, persons served, and units delivered can be pulled from WellSky to report to ACL.