



## OAA Services Provisions *Guidelines during Pandemic*

March 13, 2020

The following guidance is effective March 13, 2020 and shall remain in effective until the Executive Order is removed.

### **Congregate Meals (Title III-C1)**

AAAs and nutrition service providers may transfer current congregate meal consumers into home-delivered meal consumers. Additional guidance below includes AAA funding considerations to expand home-delivered meal services.

#### **Funding Considerations**

##### **Title III-B Funds**

- AAAs may transfer Title III-B funds to provide nutrition services, including home-delivered meals. AAAs may transfer up to 30 percent in between programs under parts B and C. If planning to use Title III-B funds for this service, AAAs must continue to allocate a minimum of five percent of Title III-B funds for priority services, that include Access Services, In-Home Services, and Legal Services. AAAs may request a waiver for Title III-B priority service funds, if necessary.
- Title III-B funds can be used for emergency assistance. If you elect to use Title III-B funds to purchase emergency home-delivered meals, enter this in WellSky as emergency assistance. Consumers can be entered as a group and not have to be registered as individuals. Assessments would not be required. Note that these meals are not NSIP eligible.

##### **Title III Transfer of Funds**

- AAAs may transfer up to 30 percent in between program under parts B and C.
- AAAs may transfer up to 40 percent in between programs under C1 and C2.
- AAAs should complete and submit an Area Plan budget transfer request form to ODA to transfer any Title III funds.

##### **Senior Community Services (SCS) Funds**

- AAAs may use Senior Community Service (SCS) funds to provide nutrition services, including home-delivered meals.

*Fostering sound public policy, research, and initiatives that benefit older Ohioans.*

### **Other Considerations**

- Daily meal providers may move to weekly meal delivery of refrigerated, frozen, and/or shelf-stable meals. For consumers with limited mobility, providers should tailor frequency of meal delivery and/or format in which meals are delivered (boxed, bagged, etc.) to meet the needs of consumers (e.g. provide 3 bags of meals rather than 1 heavy box).
- Abbreviated assessments may be completed via telephone or online format. No direct, in-person observation is required. To determine initial eligibility, abbreviated assessment must include evaluation of consumer's ability to prepare meals and if they lack another meal support service in their home or community. All NAPIS reporting requirements, including poverty reporting information, must be input within 90 days after ODA removes emergency management guidelines.
- Consumer signature is not required for meal delivery verification. Providers must obtain visual confirmation that meals have been received by the consumer. Meals should not be left at door if consumer is not home.

**Referenced Rules:** 173-4-02; 173-4-04; 173-4-05; 173-4-05.1; 173-4-05.2;

### **Home-Delivered Meals (Title III-C1)**

Additional guidance below includes AAA funding considerations to expand home-delivered meal services.

### **Funding Considerations**

#### **Title III-B Funds**

- AAAs may transfer Title III-B funds to provide nutrition services, including home-delivered meals. If planning to use Title III-B funds for this service, AAAs must continue to allocate a minimum of five percent of Title III-B funds for priority services, that include Access Services, In-Home Services, and Legal Services. AAAs may request a waiver for Title III-B priority service funds, if necessary. AAAs may transfer up to 30 percent in between program under parts B and C.
- Title III-B funds can be used for emergency assistance. If you elect to use Title III-B funds to purchase emergency home-delivered meals, enter this in WellSky as emergency assistance. Consumers can be entered as a group. NAPIS data is not necessary and assessments are not required.

#### **Title III Transfer of Funds**

- AAAs may transfer up to 30 percent in between program under parts B and C.
- AAAs may transfer up to 40 percent in between programs under C1 and C2.
- AAAs should complete and submit an Area Plan budget transfer request form to ODA to transfer any Title III funds.

#### **Senior Community Services (SCS) Funds**

- AAAs may use Senior Community Service (SCS) funds to provide nutrition services, including home-delivered meals.

### **Other Considerations**

- Daily meal providers may move to weekly meal delivery of refrigerated, frozen, and/or shelf-stable meals. For consumers with limited mobility, providers should tailor frequency of meal delivery and/or format in which meals are delivered (boxed, bagged, etc.) to meet the needs of consumers (e.g. provide 3 bags of meals rather than 1 heavy box).
- Abbreviated assessments may be completed via telephone or online format. No direct, in-person observation is required. To determine initial eligibility, abbreviated assessment must include evaluation of consumer's ability to prepare meals and if they lack another meal support service in their home or community. All NAPIS reporting requirements, including poverty reporting information, must be input within 90 days after ODA removes emergency management guidelines.
- Consumer signature is not required for meal delivery verification. Providers must obtain visual confirmation that meals have been received by the consumer. Meals should not be left at door if consumer is not home.

**Referenced Rules:** 173-4-02; 173-4-04; 173-4-05; 173-4-05.1; 173-4-05.2;

### **Grocery Ordering and Delivery**

Additional guidance below includes AAA funding considerations to expand grocery delivery. "Grocery ordering and delivery" means a service for a consumer who needs assistance shopping for groceries that allows consumers to order groceries, then delivers the ordered groceries to the consumer's home or vehicle (e.g., at a drive-thru pick-up window).

#### **Funding Considerations**

##### **Title III-B Funds**

- AAAs may use Title III-B funds for the grocery ordering and delivery. Allocations of Title III-B funds to priority services (at least five percent in each area) must be maintained. AAAs may request waiver for Title III-B priority service funds, if necessary.
- No OAA funds may pay for groceries delivered as part of this service.

##### **Senior Community Services (SCS) Funds**

- AAAs may use Senior Community Service (SCS) funds to pay for grocery ordering and delivery and groceries.

#### **Other Considerations**

- Consumer signature is not required for grocery delivery verification. Providers must obtain visual confirmation that groceries have been received by the consumer. Groceries should not be left at door if consumer is not home.

**Referenced Rules:** 173-4-10; 173-4-11

## **Personal Care Service**

Additional guidance below includes AAA considerations for personal care services.

### **Other Considerations**

- Personal Care Service providers shall communicate to the AAA all changes or adjustments to any of the following:
  - Staffing capacity
  - Plans of operation, including back-up plans and actions related to disaster planning
  - Services performed
  - Methods of communication, including how to contact providers
- Personal Care Service providers are responsible to notify the AAA when/if consumers cancel services.
- Service plans may be adapted to not include close, personal contact, such as bathing/showering. If a provider visits a consumer's home, with the intention of providing personal care, and the client refuses and/or there is a decision to decrease close-contact, the provider may still bill the service as "personal care," pending some form of homemaking has been performed.

**Referenced Rule:** 173-3-06.5

## **Adult Day Service (ADS)**

Additional guidance below includes AAA considerations for adult day services (ADS).

### **Other Considerations**

- The ADS provider should limit close-contact personal care provided onsite at the facility.
- If the ADS provider has the intention of providing intensive ADS, and the client refuses bathing and/or there is a decision to decrease close-contact, the provider may still bill the service as "intensive ADS."
- The ADS provider shall continue to provide lunch and snacks to each consumer who is present during lunchtime or snacktime. All other meals provided should be discontinued. ADS providers should not prepare meals onsite, but rather use catered meals and/or shelf-stable food.
- The ADS provider is expected to maintain a staff-to-consumer ratio of at least one staff member to every six consumers. In the event of staffing capacity issues, the ADS provider may adjust their ratio of staff-to-consumers to at least one staff member to every 10 consumers. The provider shall have at least two staff members present whenever more than one consumer is present, including one who is a paid personal care staff member and one who is certified in CPR.

**Referenced Rule:** 173-3-06.1

## **Transportation Services**

Additional guidance below includes AAA considerations for transportation services.

### **Other Considerations**

- Consumer signature is not required for transportation services. Drivers signature alone will serve as proof of service provision.

**Referenced Rule:** 173-3-06.6