




PROGRAM INSTRUCTION

SUA-21-PI-11

January 12, 2021

TO: Subrecipients of the State Unit on Aging

FROM: Cynthia Brammeier, Administrator, State Unit on Aging
And State Unit on Aging Team 

SUBJECT: SFY 2022 Area Plan Updates,
FY 2022 Reservation Table,
SFY 2022 Budget Template and Instructions

CONTENT:

Area Plan updates and SFY 2022 budgets are due by May 3, 2021. Please contact the State Unit on Aging by April 12, 2021 if you will be unable to meet this date.

The instructions for Area Agency on Aging Area Plan updates are enclosed. Word and Excel templates will be published on the website. Word and Excel files are required for most items, please use PDFs sparingly. An approved plan update and FY 2022 budget is required prior to subaward issuance and payment processing in FY 2022. The next federal fiscal year is several months away - carryover is at the discretion of the agency. It is not listed as a projection for agencies in this reservation table. The current balance on each federal award appears on the monthly payment documentation sent to the agency financial officer.

If changes were made to components of the four-year area plan, updates can be submitted as full replacements of each section:

- four-year federal and local goals, strategies, and performance measures;
- four-year Direct Service Waiver;
- annual Aging & Disability Resource Center plan;
- annual Senior Volunteer program budget narrative and plan; and SFY 2022 Budget
- SFY 2022 represents the Care Management program recertification cycle. This recertification should coincide with the remaining time of the current area plan (7/1/2019 – 6/30/23).

This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.

Nebraska area plans align with two biennial budget sessions. FY 2022 is the first year of the next State biennial budget cycle, FY 2022-23. Funding for State FY 2022 is estimated equal to SFY 2021 for planning purposes. Federal funding is estimated based on the initial award received in October, 2020, which was 10 weeks of funding (10/1/20 – 12/11/20), in tandem with the LB1008 report submitted to the Legislature in December, 2021.

Each Area Agency on Aging is required, at a minimum, to use the strategic goals set forth in the Administration for Community Living (ACL/AoA) Strategic Action Plan 2013-2018. When developing or updating objectives and strategies, performance measurements must be included to demonstrate how successful the agency is at achieving the overall goals during the planning period. Service definitions become part of the strategies for the goals, objectives and strategies. Local service area specific goals are encouraged, and should be included subsequent to the federal goals.

Changes to estimates are expected in several services as a result of the COVID-19 pandemic. Please provide updated text outlining the impact, and changes made. A full replacement of Section B may be the simplest method.

[Budget Template:](#)

Instructions for the six AAAs (AOWN, BRAAA, ENOA, Aging Partners, MAAA and WCNAAA) that receive CASA funds for Legal Aid Elder Access Line contract:
Please enter \$12,500 in the III-B tab under the “Legal Assistance” column on Line 17a (CASA). The funds may be split between “Legal Assistance” and “Legal Outreach.” Agencies using CASA funds for a private attorney contract should add it on line 17a. Funds for a legal clinic should be entered in the State Funds tab in the budget template under the “Legal Clinic” column on the line corresponding to the appropriate funding source.

[Regarding the reservation table:](#)

At an aggregate level, the Federal portion of the estimated reservation table was built using the initial FFY 2021 awards, minus hold harmless and state administration. SUA fiscal staff can work with AAAs regarding subaward balance questions. State estimates are equal to SFY 2021 funding.

The format of this reservation table resembles SFY 2021:

- Title III-A (NSIP) is listed, based on federal estimates, which have been decreasing.
- ADRC – Aging & Disability Resource Center funding is estimated based on SFY 2020. Legislation in 2021 could alter these estimates.
- CASA – Community Aging Services Act, also funds the Senior Volunteer programs, and provides state match for Federal programs.
- The three additional Senior Volunteer program providers are listed.
- Elder Justice / Elder Abuse Awareness funds can be requested for SFY 2022.
- FFY 2019 grants were extended a no-cost extension to 9/30/2021, as a result of the COVID-19 pandemic. Please budget these funds to be fully liquidated by 9/30/2021.
- A new tab is included in the budget template for budget justification, and will serve as a description of income categories.

- A new row for Medicaid Administrative Claiming funds was added as row 17d. Agencies were provided an estimate of quarterly income based on the initial data from the random moment time studies. By the time this budget is submitted, six months of data should be available for calculations. This information may be used as a baseline.
- Federal subawards remain in effect until they are fully liquidated, within the project period, therefore no carryover is estimated by the SUA.
- Agencies should use the monthly grant balance information provided with payment documentation for local carryover planning purposes.

Technical Assistance

If you have questions or would like technical assistance, please contact the State Unit on Aging.

Area Plans, OAA

The Older Americans Act (OAA) Sections 306 and 315(c)(1) provides more detailed information on Area Plans.

Updates to the sections of the plan should be identified as described in the following paragraphs. This follows the initial four-year plan instructions. Headers and footers on each page should identify the agency, the section of the plan, and page numbers starting at 1 for each section.

Submit the entire section if updates are made to portions. This will provide a consistent version at the local and state level.

Area Plan Content

Section A – Administrative

This section includes a description of the Area Agency on Aging, the mission statement, a brief history, demographic information, services, which services are provided directly by the Area Agency on Aging and which services are contracted, organizational charts, staffing, governing board, and advisory council information.

- ✓ Updates may include organizational charts, staffing, governing board and advisory council membership updates.

New this year – external SharePoint site:

- ✓ The supervisory staff list should be updated on the external SharePoint site. A print out of the supervisory staff and frequent contacts for SUA purposes should be submitted with the organizational chart. Other positions do not need to be listed beyond the organizational chart.
- ✓ The governing board and advisory council names should be updated on the external SharePoint site. A print out (PDF) of each should be submitted with the area plan update.

Section B – Program Goals, Objective, and Strategies

This section includes how the Area Agency on Aging is meeting the strategic goals set forth in the Administration for Community Living (ACL/AoA) Strategic Action Plan 2013-2018.

Objectives and strategies, performance measurements demonstrate how the agency is achieving the overall goals during the planning period. Performance measures should follow the SMART goal method: specific, measurable, achievable, relevant, and time-bound. Annual progress data regarding the goals is expected during monitoring.

With the COVID-19 pandemic, business operations were significantly disrupted. New services were offered, and some services were interrupted. It is expected AAAs may benefit from significant updates to goals, strategies, and performance measures in the area plan. These changes should be included in this submission. If a goal, strategy, and performance measure remains in the area plan, baseline information changes should be described in sufficient detail to explain how they were selected. Since the area plan is a 4-year document, baseline data should still be SFY 2019 or SFY 2020 as indicated with the original plan.

- ✓ Updates should include baseline numbers for performance measures, and modified strategies based on local needs.
- ✓ If COVID-19 services are included, a SFY 2021 baseline could be used as a placeholder.

ACL Strategic Goals:

- Goal 1: Advocacy
- Goal 2: Protect Rights and Prevent Abuse
- Goal 3: Individual Self-Determination & Control
- Goal 4: Long-Term Services and Supports
- Goal 5: Effective and Responsive Management

Planning Process

This section includes an overview of the service area, agency, planning process, how the agency is meeting the needs of the service area, strategies, and addressing the Fair Labor Standards Act.

- ✓ Updates may include modifications to how the agency is meeting the needs of the service area.
- ✓ Changes to estimates is expected in some services, as a result of the COVID-19 pandemic. Please provide updated text outlining the impact, and changes made.

Section C – Service

This section includes the service narratives and the ADRC plan. Each item with a narrative should be reflected in the composite in the budget template, and vice versa.

- ✓ Updates may include new services provided in SFY 2021, services to be added in SFY 2022, and any changes in the service delivery expectation from the original four-year plan. For example, a contract replacing direct service, or vice versa.
- ✓ Changes to estimates are expected in some services, as a result of the COVID-19 pandemic. Please provide updated text outlining the impact, and changes made.
- ✓ Run a “Served Client Summary – AAA” Report from July 1, 2020 to the current date. All Non-COVID19 services on the State Service Tab should have a service narrative.

Section D – One-Year Budget

This section includes an excel template for the budget. Please review the “read me” and “budget template instructions” tabs carefully. Details on entering data are included. Several changes were made to this format in FY 2021, including the addition of budget revision rows, net change, and explanation section by tab. For FY 2022, rows for the FFCRA and CARES Act are included, as well as the Medicaid Administrative Claiming income. A new tab is added for budget justification, describing the source of funding on line 10 and lines 14a through 15b for each Title III or State program area. An update to the tab for large purchases of single items with a unit cost in excess of \$5,000 will include instructions and items necessary for approval from the SUA for these purchases. There is a tab for future funds transfer requests. Complete the FY 2022 budget forms on the template provided. Sheets are protected, however there is no password. Do not alter formulas or locked cells. All service narratives provided must have a budget column representing the program expenditures. Please alert the fiscal team if there is a problem with the template.

- ✓ Updates should include the FY 2022 budget, based on the Reservation Table data.
- ✓ The FY 2022 reservation table reflects a projection for FFY 2022 federal funds and state match. The federal and state fiscal years overlap.
- ✓ Medicaid Administrative Claiming is expected, but not estimated. The random moment time studies and federal claims are still in process.
- ✓ No prior year carryover is projected by the SUA for AAAs in the FY 2022 table.
- ✓ Run a “Served Client Summary – AAA” Report from July 1, 2020 to the current date. All services on the State Service Tab should be listed in the budget workbook. Note:
 - ✓ COVID19 To Go Meals & COVID19 To Go Meals (NSIP) should be combined into a single budget. Note: COVID19 To Go Meals (NSIP) will show FY 2021 units, but will be part of COVID19 To Go Meals units in FY 2022.
 - ✓ Some services (e.g. Senior Center Hours) may be included in another budget (part of Congregate & Home Delivered Meals rent & utilities). Document this on the Budget Justification tab.

A best practice is to estimate federal funds through January, to allow time for the new federal budget passage, Notice of Awards, and new subawards to be prepared and signed.

It is suggested to not mix Nebraska Department of Transportation grants with Older Americans Act funds for transportation. These programs have opposing requirements regarding client identification and demographics.

Active Federal Awards at this time:

Estimates listed for FFY 2021:	Project Period
III-A / NSIP,	10/1/20-9/30/22
III-B, -C, -D, -E, VII	10/1/20-9/30/22

Carryover: For possible carryover available, please check the Federal Awards summary in the individual monthly reimbursement documentation from the SUA:

Title:	Project Period:	Notes:
FFCRA, III-C(1), C(2)	4/1/20-9/30/21	COVID-19 Pandemic
CARES Act, III-B, -C, -E, VII	4/1/20-9/30/21	COVID-19 Pandemic
III-A / NSIP (FFY 2019)	10/1/18-9/30/21	ACL issued 1 year no cost extension
III-B, -C, -D, -E, VII (FFY 2019)	10/1/18-9/30/21	ACL issued 1 year no cost extension
III-A / NSIP (FFY 2020)	10/1/19-9/30/21	
III-B, -C, -D, -E, VII (FFY 2020)	10/1/19-9/30/21	

Section E – Centers

Proposed Language: This section includes senior center updates.

- ✓ Continue to send in senior center updates as local health conditions change.
- ✓ A newer, easier to use process will be available by spring 2021.
- ✓ Updates can include identifying the hours of operation, meal information, and other services. This information is combined with other AAA service areas and posted on the public website.

Section F – Disaster Plans

This section includes the agency disaster plan. Samples of center disaster plans were submitted in Section I with supplemental documentation. Plans include the existence, and most recent date of revision, for each senior center. Disaster plans were reviewed in greater detail during SFY 2020 and SFY 2021 monitoring.

- ✓ Updates may include an updated version of the agency and/or senior center disaster plans. After the floods of 2019, and COVID-19 pandemic in 2020, AAAs updated disaster plans.

Section G – Direct Service Waiver/s

This section includes the Direct Service Waiver Request/s and Assurances. Direct Service Waiver requests must outline what other agencies are providing the service the agency is proposing to offer directly, and justification to not utilize subawards or contracts for these services. See also OAA, Section 307(a)(8).

- ✓ Updates are not expected at this time, unless changes are made regarding services provided.

Section H – Care Management Recertification – SUA-21-PI-10

This year, the Care Management Unit certification will begin to align with the four-year area plan. This section includes Care Management Unit certification for a two-year period, July 1, 2021 through June 30, 2023. Please note: The new regulations were approved in September, and will now permit a four-year recertification. With this two-year certification, it will bring the Care Management Unit in line with the full four-year area plan. In SFY 2024, the Care Management Unit certification will be conducted with the rest of the area plan submitted in that year. Care Management recertification requirements are administered through a separate PI, listed above.

Section I – Supplemental Documentation

1. Assurances	✓ No updates are anticipated.
2. Sample of a contract	✓ No updates are anticipated, unless the AAA has modified their contracts.
3. Sample of a subaward	✓ No updates are anticipated, unless the AAA has modified their subawards.
4. Sample of direct center disaster plan	✓ Updates may be anticipated based on SFY 2019 flood experience, COVID-19, and SFY 2020 monitoring.
5. Sample of contracted center disaster plan	✓ Updates may be anticipated based on SFY 2019 flood experience, COVID-19 pandemic, and SFY 2020 monitoring.
6. Legal Provider Contracts	✓ Contracts are needed annually. A Pre-award risk assessment for Legal Assistance contract(s) is not required.
7. Agency brochure (optional)	✓ No updates are anticipated, unless these have been updated.
8. Agency Newsletter or Calendar (optional)	✓ No updates are anticipated.
9. Agency ADRC brochure (optional)	✓ Changes may include ADRC Partner Organization inclusion.

Resources

Federal:

Goals: https://www.acl.gov/sites/default/files/about-acl/2016-09/ACL_Strategic_Plan.pdf

OAA Section references include, but are not limited to, Title III, Grants for State and Community Programs on Aging – see 2020 Reauthorization

<https://acl.gov/about-acl/authorizing-statutes/older-americans-act>

Part A, General Provisions, Administration, Definitions, Allotment, Organization,

- Section 306 – Area Plans
- Section 310 – Disaster Relief Reimbursements
- Section 311 – NSIP Nutrition Services Incentive Program
- Section 312 – Multipurpose Senior Centers
- Section 313 – Audit
- Section 314 – In-Home Services
- Section 315 – Consumer Contributions

Part B, Supportive Services and Senior Centers

- Section 321 – Supportive Services

Part C, Nutrition Service

- Section 330-339 – Nutrition Service
- Subpart 1, Congregate Nutrition Services
- Subpart 2, Home Delivered Nutrition Services

Part D, Evidence Based Disease Prevention and Health Promotion Services

- Section 361 – Evidence Based Disease Prevention and Health Promotion Services

Part E, National Family Caregiver Support Program

- Section 371-374 – National Family Caregiver Support Program

Title VII, Vulnerable Elder Rights Protection Activities

Chapter 1, General State Provisions

- Section 701-706 – Authorization, Allotment, Organization, State Plan Requirements, Demonstration Projects

Chapter 2, Ombudsman Programs

- Section 711-713 – State Long-Term Care Ombudsman Program

Chapter 3, Prevention of Elder Abuse, Neglect, and Exploitation

- Section 721 – Prevention of Elder Abuse, Neglect, and Exploitation

State governance

State Statutes:

- Aging Advisory Committee: 68-1101 68-1105,
- ADRC: 68-1111 68-1119
- Transportation: 75-303.01 - .02,
- CASA: 81-2201 to 81-2228
- Care Management: 81-2229-2235,
- Ombudsman: 81-2237 – 2263
- Senior Volunteer Program: 81-2273 – 81-2283

Nebraska Administrative Code,

- Title 15 NAC 1-6 Regulations were signed in September, 2020. Guidance on the regulations was issued in Program Instructions for each chapter.