



PROGRAM INSTRUCTION

SUA-21-PI-14

February 4, 2021

TO: Subrecipients of the State Unit on Aging
FROM: Cynthia Brammeier, Administrator, State Unit on Aging
BY: Bob Halada, Fiscal Program Manager
SUBJECT: Additional Nutrition Funding

This Program Instruction outlines additional emergency nutrition funding awarded to Nebraska. This PI includes excerpts from the ACL FAQ document regarding the most recent home delivered meal funds awarded to states. The full version (6 pages) of the FAQ is available online:
<https://acl.gov/sites/default/files/common/AoA%20-%20Fiscal%20FAQs%20Supplement%205%201-28-2021.pdf>

This additional home delivered meal allocation will be added to the Nebraska FFY 2021 subawards with the Area Agencies on Aging. These funds will be added to the reservation table and as a separate line in the budget template, named HDC5.

These funds are from the Consolidated Appropriations Act, 2021, Public Law No: 116-260, signed into law on December 27, 2020, which provides funding for FFY2021 "regular" Older Americans Act (OAA) programming and extends flexibilities provided in the Families First Coronavirus Response Act and the CARES Act.

All of the FFY2021 Supplemental funds will be allocated to Home Delivered Meals, Title III-C2. The Consolidated Appropriations Act, 2021 Supplemental Nutrition Funding (Supplemental 5-HDC5) has a project period from December 27, 2020 through September 30, 2022.

Area Plan Administration: 10%

- Calculated as 10% of the cumulative total of all of the regular Title III grants plus the Consolidated Appropriations Act, 2021 Supplemental Nutrition funding.
- Funding may be calculated as indicated above; however, funds for Area Plan administration may be expended from any part or parts of the regular Title III grants (except for Part D) and/or the Consolidated Appropriations Act, 2021 Supplemental Nutrition funding (Supplemental 5-HDC5).

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.

Service Match for Home Delivered Meals is not required for the Consolidated Appropriations Act, 2021 Supplemental Nutrition grants; i.e. 15% service match and 1/3 of 15% State Match for Services. The Major Disaster Declaration (MDD) Fiscal FAQ provides more information on match requirements that apply to States exercising maximum flexibility under a MDD.

FFY2021 and prior years “regular” Title III grants must still meet the required match amounts as listed on the Notice of Award (NOA).

Under a Major Disaster Declaration incident period, ACL encourages grantees to utilize the bucketing allowed during the incident period.

Additionally, the COVID-19 crisis is expected to completely skew traditional meal service and meal counts. As a result, ACL is holding harmless meal counts from 2019 and will apply them to 2020 and 2021 NSIP allocations.

The State agency must distribute this Title III supplemental funding based on the Intrastate Funding Formula (IFF) approved by the Assistant Secretary for Aging.

Given the current grant sources available as of January 2021, ACL encourages the use of funding in the following order:

1. “Regular” OAA Title III grant funds, starting with the oldest funds available first;
 - a. FFY 2018, liquidation period end date 12/30/2021 [some III-D remains, see notes below]
 - b. FFY 2019, project period end date 9/30/2021 [no cost extension included];
2. Families First Coronavirus Response Act (FFCRA) funding, project period end date 9/30/2021;
3. CARES Act funding, project period end date 9/30/2021;
4. FFY 2020 “Regular” OAA Title III grant funds, project period end date 9/30/2021;
5. Consolidated Appropriations Act, 2021 (Supplemental 5-HDC5), project period end date 9/30/2022; and
6. FFY 2021 “Regular” OAA Title III grant funds, project period end date 9/30/2022.

The ACL COVID-19 guidance page has a table with links, from the page listed, select “download word document” near the top of the page.

<https://acl.gov/programs/survival-guide-navigating-covid-19-guidance-those-administering-title-iiic-programs>

From the Fiscal FAQ: Major Disaster Declaration (April 8, 2020):

1. *Can we go back to FFY 18 and 19 grants that are still open and exercise the flexibilities under a MDD?*
Yes. States with a MDD may use any portions of any open OAA grant awards (i.e., FFY 2018, 2019, or 2020) in order to provide disaster relief services.
2. *Can prior year funding be used for the Major Disaster Declaration and can funds be bucketed? If so, how does this affect match requirements?*
Yes, States with a MDD may use any portions of any open OAA grant awards (i.e., FFY 2018, 2019, or 2020) in order to provide disaster relief services. In terms of “bucketing” funds, States can use any portion of the funds made available under the OAA for disaster relief for older individuals. For example, a State may use Title III-E funding to provide home delivered meals to

older adults that would normally be funded under Title III-C-2. In terms of match requirements, States are still required to meet overall match amounts, but they may be pooled.

3. Can program income collected be “bucketed” for use on any program?

Yes, with a major disaster declaration funding during the time period may be expended on OAA allowed activities.

4. How should program income be reported when we are collecting and expending funds out of multiple finding sources?

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.

Additional funding will be added to subawards, and the reservation table:

Title III-C(2) \$930,790.00				
BRAAA	\$ 68,464.00		SCNAAA	\$ 75,790.00
ENOA	\$ 270,611.00		AOWN	\$ 68,547.00
LAAA	\$ 151,295.00		NENAAA	\$ 141,665.00
MAAA	\$ 81,943.00		WCNAAA	\$ 72,475.00

The reservation table will be updated with these amounts later this month. The ACL is anticipating issuing the regular FFY2021 Notice of Awards to states in mid-February. The SUA will apply the intrastate funding formula and issue an updated reservation table based on the new amounts. Stay tuned.

If you have questions regarding this funding, please feel free to call Bob Halada, at 402.471.4737.