

CALIFORNIA DEPARTMENT OF AGING

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PROGRAM MEMO

TO: Area Agencies on Aging

NO: PM 20-07

DATE ISSUED: April 13, 2020

SUBJECT: Families First Coronavirus Response Act (H.R. 6201)

EXPIRES: September 30, 2021

PROGRAMS AFFECTED: Title III-C1 and Title III-C2

SUPERSEDES: N/A

Purpose

This Program Memo (PM) provides funding information and specifies flexibilities, reporting, and requirements for your Families First Coronavirus Response Act (H.R. 6201) Title III C1 and C2 direct funding allocation.

Please contact your assigned fiscal analyst for your Budget Display. This document is no longer available on the Area Agencies on Aging (AAA) page of the California Department of Aging's (CDA) website.

Funding

In response to the COVID-19 crisis, Congress has approved the Families First Coronavirus Response Act (H.R. 6201) which allocated \$250 million in Nutrition funds at the national level for both Congregate and Home-Delivered Meals. California's H.R. 6201 allocation amount is \$25,086,381. The H.R. 6201 Title III C1 and C2 allocations are based on the Federal Fiscal Year (FFY) 2019 emergency grant award. CDA encourages and supports strategies for quickly and effectively using funds to meet new COVID-19 community needs, including supporting new partnerships to build needed capacity. These funds are available for expenditure until September 30, 2021.

Additionally, California has been granted the Major Disaster Declaration (#DR-4482) under the Stafford Act. This allows AAAs maximum flexibility with all Title III funding. Section 310(c) 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. In this regard, flexibility is provided for states – without the need for a separate application, transfer request, or request for a waiver -- to use existing allocations already made to them under Title III-B, C-1, C-2, D, and E for disaster relief. AAAs have discretion to spend any Title III funding on disaster relief and will not be required to submit transfers to do so.

This means that a state 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 drive through, 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.

As an example, as part of their COVID-19 disaster relief activities, a state may use:

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

H.R 6201 Program funding does not have a match requirement. AAAs can use up to 10% of these funds to cover Administrative costs, however, H.R. 6201 Administration funding does have a 25% local match requirement. Please refer to your Budget Display for your Administrative allocation. AAAs do not have to expend Administration dollars on Administrative activities. All H.R. 6201 funding can be expended on COVID-19 response activities.

CDA waives our requirement of the board resolution for the H.R. 6201 emergency funds. Please note, this waiver that only applies to CDA's requirement and AAAs will still need to follow their individual/local requirements for accepting these funds which may require a board resolution.

CDA is not requiring AAAs to submit Budgets for the H.R. 6201 allocated funding. However, CDA is requiring pre-approval of AAA Administrative and AAA Direct Services equipment above \$5,000. Please work with your program analyst to gain approval for purchases in excess of the \$5,000. AAAs may provide pre-approval for its subcontractor equipment purchases in excess of \$5,000. AAAs must maintain appropriate records of written pre-approval and inventory of all its subcontractor equipment purchases for Closeout.

Budget Displays

The Budget Displays for the H.R. 6201 allocations reflect funding available between March 20, 2020 through September 30, 2021. The funding is reflected in both Title III C1 Congregate Meals and Title III C2 Home-Delivered Meals. Under the provisions of the Stafford Act, AAAs have discretion to spend the funding on COVID-19 response activities and meals outside of the Title III C1 and C2 categories for any necessary disaster relief for older individuals.

Allocation Methodology

H.R. 6201 funding has been allocated based on the FFY 2019 Interstate Funding Formula factors. This funding is separate from the Area Plan funding and has no impact on previous Area Plan allocations.

These funds are being directly allocated to AAAs and do not require a new contract or contract amendment.

Expenditure Reports and Closeout

This funding is separate from all other Title III C1 and C2 Area Plan funding and must be tracked separately. Data and expenses for H.R. 6201 funding should not be tracked in/for the NAPIS/SPR systems. The Administration of Community Living, which provides federal oversight of this funding, has requested that AAAs and providers track these expenditures separately, "At a minimum and where possible, States should be recording the number of clients to whom service is provided, the name or category of services provided, the number of units of service provided, and the expenditures related to providing such services".

To report expenditures, AAAs must use the California Aging Reporting System (CARS) and the "H.R. 6201 Expenditure Report" which will be forthcoming. This document will be located under the [Fiscal Forms and Documents](#) page on CDA's website.

For guidance reporting expenditures, refer to the forthcoming H.R. 6201 Expenditure Report instructions which will be located under the [Fiscal Forms and Documents](#) page on CDA's website.

CDA will process a one-time direct allocation payment of each AAA's entire allocated amount in April-2020. As mentioned above, this funding will be available for expenditure until September 30, 2021.

AAAs are required to submit quarterly expenditure reports on 7/15/2020 and 10/15/2020.

Effective November 30, 2020, AAAs must submit monthly expenditure reports to CDA. Expenditures must be reported from the expended funding stream regardless of the activities that were funded. It is the responsibility of the AAA to track and monitor the actual number of persons served and the activities/meals provided.

If AAAs elect to expend their Administration funding on Administration activities, the AAA must provide match information in the H.R. 6201 closeout documents.

A closeout will be due on 10/31/2021 for the H.R. 6201 funds. This closeout will be separate from the Area Plan closeout. Remaining fund balances will not be eligible for One-Time-Only funding carryover. All fiscal forms can be found under the [Fiscal Forms and Documents](#) page on CDA's website.

Deadlines

AAAs must abide by the expenditure reporting dates listed above.

Effective 11/30/2020, Monthly Expenditure Reports are due at the end of each following month. Expenditure time periods and closeout deadlines are footnoted on the Budget Display.

Inquires

For fiscal and data inquiries, email: FiscalTeam@aging.ca.gov

/S/

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