



FAQS - PROGRAM REPORTING GUIDANCE – COVID RESPONSE

ACL Title III Older Americans Act – State Program Report (SPR)

June 4, 2020

1. How should SUAs report Program Income generated with funds expended under Major Disaster Declaration (MDD) flexibilities in the SPR? Is there a difference between how Program Income information is reported in the SPR versus in fiscal reports to ACL?

Program Income should be reported in the **SPR programmatic report** for the service from which it was collected. The SPR requires Program Income to be reported as follows:

- By service when expended as a part of Total Expenditures on Section II.A, II.B, II.C, and II.E, as appropriate
- By service when received (i.e., collected) under Program Income Received on Section II.A, II.B or II.C, as appropriate

Example: If a SUA was allowing expenditures for home-delivered meals to be charged to the Title III Part D program under the MDD flexibility, the Program Income generated from such home-delivered meals would be reported under home-delivered meals in the SPR.

Program Income should be reported on **fiscal reports** from the Title and Part which funds were collected and expended. Program Income must be reported on fiscal reports under the grant award number in which funds were collected and expended.

Example: If a SUA was allowing expenditures for home-delivered meals to be charged to the Title III Part D program under the MDD flexibility, the Program Income generated from such home-delivered meals would be reported under Title III Part D on fiscal reports as Program Income Earned. Once the Program Income Earned is expended it would be reported under the Title III Part D fiscal reports as Program Income Expended in accordance with the Addition Alternative as outlined at 45 CFR 75.307 (e)(2).

Usually, Program Income must be used to expand the service for which it was collected; for example, the Program Income generated from home-delivered meals from any funding source is to be used to expand the home-delivered meal service. However, as ACL stated in previous MDD fiscal guidance, Program Income collected can be “bucketed” for use on any program during the MDD time period. See [Fiscal FAQ: Major Disaster Declaration \(Word\)](#) for further information.

If SUAs have further questions, they may contact their Regional Administrator and/or Fiscal Specialist for assistance.

2. Is nutrition risk and other demographic information still required to be reported in the SPR for those receiving home-delivered meals, homemaker, and other services while we are operating under a MDD and state restrictions?

Reporting of nutrition risk and other demographic information is still required for Older Americans Act, Families First Coronavirus Response Act and CARES Act funding, including while operating under a MDD or other state restrictions. Nutrition risk and other demographic data can be collected over the phone, on-line, or otherwise.

The demographic characteristics that are required by service are listed in the SPR reporting requirements at https://acl.gov/sites/default/files/programs/2020-01/State_Program_Report_0985-0008_Expires12312022.pdf.

For example, as OAA programs require certain information to establish eligibility for programs (such as age and/or caregiver status), this information is routinely collected and should continue to be reported. However, ACL understands that due to increased demand and volume under emergency response conditions, there may be higher levels of missing client demographic data. ACL encourages States and aging services providers to collect and report demographic data to the greatest extent practicable. ACL also expects that any significant missing data and variances be explained, including those variances related to COVID response.

3. Is the SUA required to use the terms, definitions, units of service, etc. described in the SPR reporting guidance if a similar service is already implemented in our state?

SUAs can continue to use the terms, definitions, and units of service the SUA has established where they align with SPR reporting guidance.

For example, if a SUA has a “Health Support Items” term and definition that is used for incontinence and other consumable supplies, there is no need for the SUA to change their use of the term “Health Support Items.” Assuming the unit definition is consistent with or easily convertible to the ACL guidance when the SUA submits their SPR, the SUA should map this service and include it under Consumable Supplies (or make manual edits to that effect). In so doing, SUAs can meet the ACL SPR Reporting Guidance, while allowing SUAs to maintain existing service terms.

4. For the Title III-E National Family Caregiver Support Program (NFCSP), we currently include meals as part of a Consumable Supplies subservice under Supplemental Services. Is that ok or should we track and report meals provided under the NFCSP separately?

ACL requests that SUAs separately track and report Home Delivered Meals, Consumable Supplies, Assistive Technology/ Durable Equipment/ Emergency Response, and Homemaker-Delivery provided via NFCSP Supplemental Services under Section IV.A, in accordance with the guidance provided at [Title III State Program Report: COVID-19 Response Reporting Guidance - May 11, 2020 \(Word\)](#). This will allow ACL to more consistently and clearly tell the story of the services provided by the aging network, including with supplemental funding, in response to COVID-19.

5. Will the SPR re-design / OAAPS implementation for FY2022 be pushed back? We are quickly approaching FY2021, and I imagine during FY2021 everyone will need to begin “gearing up” for the new SPR / OAAPS.

Yes, the new SPR / OAAPS will be used to report FY 2022 data which covers the period October 1, 2021-September 30, 2022. If anything changes in that regard we will alert everyone.

ACL has scheduled seven upcoming training webinars to assist Title III state grantees with becoming knowledgeable of the new SPR and OAAPS. These webinars are scheduled between June 2, 2020 and October 7, 2020. For those of you who are not able to attend, we will also provide self-directed training materials on the [OAAPS](#) website to ensure that you are informed. We encourage you to review and become familiar with Title III technical documents on the OAAPS website as well. Please check the OAAPS website for the Title III training webinar schedule. In addition, please feel free to contact us at: ACL-OAAPS-PILOT@icf.com if you have any questions.

6. How should we report volunteer services (for example, in homemaker) that do not have expenditures tied to them?

Volunteer services are considered to be in-kind expenditures. Such in-kind expenditures can be counted towards match for OAA Title III grants. The in-kind expenditure should be based on what the program would have had to pay for this service if not provided by volunteers. In-kind expenditures should be reported on fiscal reports and on the SPR programmatic report.

Volunteer services should be reported in the **SPR programmatic report** by service and included as in-kind expenditures under Total Service Expenditure on Section II.A, II.B, II.C, and II.E, as appropriate.

For example, if the going rate for delivery staff is \$15/hour, the program should report units of delivery x \$15 to calculate the in-kind expenditures that would be reported under Total Service Expenditure for the Homemaker service. Please see 2 CFR 200.306 for more information.

States are also welcome to include detail like “All Homemaker units were provided by volunteers” on Section IV.A.