



FISCAL FAQ: MAJOR DISASTER DECLARATION

Older Americans Act Fiscal FAQ Under a Major Disaster Declaration

April 8, 2020

Should a State or Tribe (Title VI grantee) request and receive a Major Disaster Declaration (MDD) by the President under the Stafford Act, it triggers [disaster relief authority in the Older Americans Act \(OAA\)](#). Once a MDD request by a State is approved, Section 310(c) permits states to use any portion of the funds made available under 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 the Act for disaster relief.

These FAQs are specifically to address the flexibilities provided to States with a MDD.

Timeframes & Definitions of Disaster Relief Services for Older Individuals

ACL considers disaster relief services for older individuals to be any services during the period covered by the State's MDD that are provided to eligible older individuals or family caregivers as defined under the OAA.

States may use any portions of any open OAA grant awards (i.e., FFY 2018, 2019, or 2020) in order to provide disaster relief services. States should communicate with AAAs regarding State expectations for use and reporting of services and funds provided with MDD flexibilities.

Related Questions:

1. What is a regular service vs. a COVID service?
 - Any allowable Older Americans Act service provided to an eligible person under the OAA during this COVID-19 emergency is considered a disaster relief service. See your State's MDD for more information regarding dates.
2. 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.
3. Does the flexibility under the MDD last for the entire FFY?
 - Services provided under the MDD flexibility should be limited to the period of the MDD. However, fiscal reporting (i.e., SF-425) will occur over the usual FFY reporting period. Please also see the recommended order of use of funding under the Fiscal FAQ.
4. Does the flexibility under the MDD apply to NSIP funding too?
 - Yes, but NSIP funds may only be used to purchase domestically produced food products. Additional flexibilities are not available.
5. Does the flexibility under the MDD apply to Title VII too?
 - Yes, the flexibility exists under Title VII.
6. If the major disaster ends, are FFCRA and CARES Act funding no longer available?
 - Funds were appropriated to remain available until September 30, 2021, to prevent, prepare for, and respond to Coronavirus, therefore. It would be prudent to assume that even after the major disaster or

public health emergency has concluded there will still be expenses related to the coronavirus response, such as stocking congregate meal kitchens that were suddenly closed, starting back up transportation for seniors, etc.

7. It sounds like the total funding needs to stay within the originating authorization (i.e. regular T-III, FFCRA and CARES), but within each originating authorization the AAA can move funds around as needed. Is that correct?
 - Yes, expenditures of funds must be reported separately for each grant award. Once a Presidentially Declared Major Disaster is approved, an SUA may expend funds from any source within the grant award, but should be mindful to track the source of expenditures.
8. Do flexibilities in “bucketing” funds extend to regular OAA FFY2018, 2019 and 2020 Title III grants?
 - Yes, however please see order of use of funding for additional guidance.
9. Are FFCRA and CARES Act funds available for “bucketing”?
 - Yes, FFCRA and CARES Act funds are available with maximum flexibility when a major disaster declaration has been approved during the incident period as defined in the declaration.
10. Are transfers required to “bucket” funding?
 - States do not have to make transfers once a major disaster declaration has been approved. States have the ability to designate funds as “disaster relief” and spend them in response to the identified needs out of any Part of the Act, and can include FFCRA and CARES Act funding.

Match

For states exercising flexibility with Title III funding under a MDD, the following match requirements apply:

- States can pool match between all services
 - Example: Title III-E service funds have a match requirement of 25%. A State may use overmatch provided for in C-2 Home Delivered Meals, to meet the match requirement during this MDD.
- States may use Service match to meet State Plan and Area Plan Administration match requirements
 - State Plan and Area Plan Administration have a match requirement of 25%. Overmatch from services may be used to meet this match requirement.
 - Additionally, a State may pool the use of overmatch in Regular Title III grants to meet State Plan and Area Plan Administrative match requirements for FFCRA and CARES Act.
 - Example: A State took State Plan Administration in the FFCRA funding, and the State had overmatched Title III C-2, Home Delivered Meals. The State may use that overmatch to meet the State Plan Administration match in FFCRA.
- States should report match as they usually would in the SF-425. Please make a note in Box 12 of the SF-425 report when match is pooled.

Related Questions:

1. 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.

Program Income

Program income may be used to expand any OAA service for the duration of the MDD. Program income must be reported under the grant award number in which expenditures were made.

Related Questions:

1. 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.
2. 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.

Fiscal Reporting

For purposes of reporting on the SF-425, States should be prepared to report as follows:

- States will continue to use the SF-425 and the Title III Supplemental form to the SF-425 to report OAA Title III expenditures, including if a State exercises flexibilities under a MDD.
- States must separately track and report other sources of funding, including supplemental funding under the FFCRA and CARES Act.
- Further guidance will be provided regarding programmatic reporting for States exercising flexibility with Title III funding under a MDD. States should be prepared to track the number of persons served, units provided, and related expenditures.