

## COVID-19 Funding and Flexibility Authority Chart

The following chart depicts the authority of each of the COVID flexibilities in place. Flexibilities that have ended are struck through. The end dates are highlighted in yellow.

The Declaration of Public Health Emergency was made by the Secretary of Health and Human Services (HHS) on January 31, 2020, with a current end date of **April 11, 2023**.

COVID-19 Family First Coronavirus Response Act- Supplemental Appropriations #2, (Families First Act) enacted on March 18, 2020, and effective through **September 30, 2022**. Flexibilities enacted through this act are available for the duration of the Public Health Emergency.

Missouri’s Major Disaster Declaration under the Stafford Act was approved on March 26, 2020, with an end date to be determined. The start of the disaster declaration period is 1/20/2020.

COVID-19 Coronavirus Aid Relief and Economic Security (CARES Act)- Supplemental Appropriations #3, enacted on March 27, 2020, and effective through **September 30, 2022**. Flexibilities enacted through this act are available for the duration of the Public Health Emergency.

~~Governor’s Executive Orders 20-04 and 12-12 allows for the waiver statutory and regulatory requirements directly affected by the pandemic. These are in effect through **December 31, 2021**.~~  
**Ended December 31, 2021**

ACL automatically gave waivers to for extension of spending program and supplemental funds.

**NEW** American Rescue Plan, enacted on January 20, 2021, provided funding for all Titles under the OAA. Funding available through **September 30, 2024**.

**NEW** Expanding Access to COVID 19 Vaccines via the Aging Network provided through CDC to serve older Adults and their caregivers for providing access to vaccines. Funding available April 1, 2021 through **September 30, 2022**.

**NEW** SFY2020 Regular Title III, Title VII, and NSIP grants were given a blanket no-cost extension through **September 30, 2022**.

Flexibility	Public Health Emergency	Major Disaster Declaration	Families First Act	Cares Act	Governor’s Executive Order	ACL Waiver	ARP
<b>HDM and Congregate Meals</b>							
Meals purchased with OAA funding and supplemental funding are not required to meet DRIs as long as the Public Health Emergency is in effect; however, ACL encourages the use of DRIs and DGAs to maintain health and manage chronic disease. <b>(Statute does not give ACL</b>	<b>x</b>		<b>x</b>	<b>x</b>			

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the authority to waive the Dietary Reference Intakes (DRI) applicable to meals the Nutrition Services Incentive Program (NSIP). Part B may pay for meals that do or do not meet DRI requirements during this Public Health Emergency to ensure access to meals for seniors.)							
<del>Section 192.2150 RSMo shall be suspended to the extent that it restricts the Department of Health and Senior Services' provision of home delivered meals, to community based not-for-profit organizations that are available at no more than 75% of the Department's previously incurred cost.</del>					*		
Homebound definition for home delivered meals includes individuals who are practicing social distancing due to COVID-19.	x		x	x			
<del>19 CSR 15-4.240 and 19 CSR 15-7.060, are waived to the extent necessary to temporarily suspend certain requirements for nutrition services for the elderly to permit Area Agencies on Aging to contract with local restaurants to prepare and deliver home delivered meals.</del>					*		
To go/drive-thru meals allowed, should be counted as HDM's.		x					

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<b>Title III D Highest Level Evidence Based Programs</b>							
SUAs may include older adults (60+) who live outside of their state in group format, remotely delivered evidence-based health promotion and disease prevention programs. However, SUAs should take care to follow any licensing rules for the program being implemented, which may restrict the ability to deliver programs to persons living outside of specifically defined geographic areas.							x
Technology, such as laptops or hotspots, can be purchased using ARP funds if the technology is needed for the delivery of EBP remote programs. Purchase of necessary technology is allowed, as long as OAA III-D grantees adhere to federal, State and local policies and procedures in making these purchases. ACL encourages grantees to develop policies and procedures governing the provision and usage of such devices and to consider issues such as							x

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<p>whether they will be provided on loan, or permanently; how will IT support be provided; who is responsible if the device is broken, lost or stolen; will it be used only for the duration of the evidence-based program and then retrieved; etc. The National Council on Aging keeps a resource page with tips for securing technology and/or internet access for older adults, which is available <a href="#">here</a>.</p>							
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<b>Title III E Family Caregiver</b>							
<p>ARP funds can help support the OAA Title III-E program services. ACL recognizes grandparents raising grandchildren may need support in getting appointments and transportation for their grandchildren to receive COVID vaccinations once they are eligible, and this would be considered an appropriate use of funds.</p>							<b>x</b>

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<b>Financial Flexibilities</b>							
While Missouri is under the Major Disaster Declaration, maximum flexibility is allowed between all areas of Title III to allow AAAs to provide the essential services needed to meet the needs of older adults and adults with disabilities. All monies can be bucketed into any Titles to be used for disaster relief, as needed (this includes regular OAA funding for FFY2018, FFY2019, FFY2020 and Families First and Cares Act funds). NSIP funds may only be used to purchase domestically produced food products.		<b>x</b>					
100% transfer allowed between C1-C2.			<b>x</b>	<b>x</b>			
With the Major Disaster Declaration approved for Missouri, funding originally allocated under Title III D may be used for other disaster relief activities such as: conducting daily phone/virtual/in-person well-being checks; providing meals, providing in-home services,		<b>x</b>					

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grocery/pharmacy/supply delivery, etc.							
Family First and CARES Funding provided to State Of Missouri, able to spend until September 30, 2021.			x	x			
<p>States can pool match between all services.</p> <p>States may use Service match to meet State Plan and Area Plan Administration match requirements</p> <ul style="list-style-type: none"> <li>o State Plan and Area Plan Administration have a match requirement of 25%. Overmatch from services may be used to meet this match requirement.</li> <li>o 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.</li> </ul>		x					
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.		x					
Service Match (Congregate and Home Delivered Meals) is not required for the FFCRA or CARES Act supplemental grants; i.e. 15% service match and 1/3			x	x			

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of 15% State Match for Services. However, if taken, State Plan and Area Plan administration match is required at the normal 25% match rate.							
FFY2018 Title III, Title VII, and NSIP grants will be provided a liquidation extension for an additional year to December 30, 2021. Please note funds must have been obligated by September 30, 2018 to be available for expenditure and liquidation.						x	
No Cost Extension of FFY2019 Title III, Title VII, and NSIP funds until September 30, 2021.						x	
No cost extension of FFY2020 Title III, Title VII, and NSIP until September 30, 2022.						x	
If American Rescue Plan funds are obligated during the MDD, the financial flexibilities are available until the obligation is liquidated or the obligation period ends.							x
For the ARP Title III grant only, program income may be used to meet match requirements of the federal award in which the income is generated.							x

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<b>Other Flexibilities</b>							
19 CSR 15-4.220(3) waived to the extent necessary to temporarily allow the use of live video technologies for area agencies on aging to conduct annual compliance monitoring evaluations of service providers.					*		
19 CSR 15-4.160(4), is waived to the extent necessary to temporarily extend a requirement that DHSS approve Area Agency on Aging plans or plan amendments within 15 days of submission. This waiver avoids the need for public hearings, which would violate social distancing orders.					*		
Disseminating credible information about COVID-19 vaccines and help direct those with questions to additional sources of information; Identifying people who may need help getting a COVID-19 vaccination, including those who are unable to independently travel to a vaccination site; Helping with scheduling a COVID-19 vaccination appointment for those who need help; Arranging or providing accessible transportation to							x



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COVID-19 vaccination sites; Providing technical assistance to local health departments and other entities on vaccine accessibility; Providing personal support if needed (e.g., peer support); and Reminding the person of their second vaccination appointment if needed.							
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