

# Public Comment Requested Oregon State Unit on Aging Intrastate Funding Formula (IFF) Revision



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The Office of Aging and People with Disabilities (APD) within the Oregon Department of Human Services (ODHS) is proposing to revise its Intrastate Funding Formula (IFF) used for distribution of funds received under Title III and Chapter 3 of Title VII of the Older Americans Act (OAA). APD, in its function as the designated State Unit on Aging, is seeking public comment prior to submission of proposed revisions to the federal Administration for Community Living (ACL) in the form of a State Plan on Aging Amendment.

## Background

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The IFF is a set of mathematical formulas APD uses to distribute federal OAA funding to the Area Agency on Aging (AAA) network for services delivered by each AAA. As the Oregon State Unit on Aging, APD is required by the OAA to have a formula for the distribution of these federal funds to the 16 AAAs in the state. ACL provides specific guidance and requirements on factors which

must be addressed in an IFF. Those factors are addressed in the current IFF, which was approved by ACL in the *2021-2023 Oregon State Plan on Aging*. However, for the purposes of this proposed IFF revision, specific elements below are detailed because they explain the data used and the effect of the IFF changes on individual AAAs in the statewide network.

## Public Review and Comment requested

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This change in the IFF will result in specific funding changes, increased or decreased, for each of the 16 AAAs across the state. Any change in funding methodology has impacts. The purpose of this Request for

Comment is to inform the public and receive input for consideration prior to submitting these proposed changes to the federal government.

## What are the proposed IFF revisions?

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APD, in consultation with the AAA network, is proposing to use a base, or minimum, amount for the allocation each AAA receives for Congregate Meals (Title IIIC1) and Home Delivered Meals (Title IIIC2). The revised IFF will provide a base of \$20,000 to each AAA for Congregate Meals and a base of \$5,000 for Home Delivered Meals. The remainder of each of those allocation amounts will then be distributed across all AAAs using the same population based formula as is described in the current IFF.

The current IFF provides for a minimum allocation to one AAA, Harney County Senior & Community Services Center (HSCSC), of \$32,000 for congregate meals and \$4,000 for home delivered meals. If the population based IFF factors provide less than this minimum funding, HSCSC's allocation is raised to this minimum allocation, leaving a lower balance to be distributed among remaining AAAs. In this revised IFF proposal, all AAAs will receive equal base amounts of \$20,000 for congregate meals and \$5,000 for home delivered meals, with remaining funds allocated according to the current population based formula.

# Why does the IFF need to be changed?

This change, proposed by the Oregon Association of Area Agencies on Aging and Disabilities, is necessary because the current IFF adjustment for minimum congregate and home delivered meals allocations has resulted in Oregon's smallest AAAs facing extreme financial challenges. The current allocation formula has not kept up with the cost of delivering services and does not follow a standard formula allocation. The proposed changes to the IFF acknowledge there is a minimum outlay or "base" cost involved

in operating a meal program, regardless of the number of meals provided (delivered/served), and there is agreement among all the AAAs in the state that this across-the-board base allocation is appropriate. The amount for each proposed base (C1 and C2) was determined according to operating cost minimum assumptions and the overall impact statewide. Several base amounts were considered, along with other potential formula changes, while considering balancing the impacts on each program.

# What is the impact of these changes?

Changing the IFF to include a standard base allocation for all AAAs will increase the nutrition program funding for nine AAAs representing less populated areas (most of whom are serving largely rural and frontier areas of the state). This means that those AAAs will have more funding to provide home delivered meals and meals provided in congregate

sites (like senior centers). The change will reduce funding for seven AAAs, primarily representing more densely populated areas. While the dollar amounts vary, no AAA would see a net change (either increase or decrease) in overall OAA funding of greater than 0.1% (in the current 2-year funding period).

# What is the current IFF, and what are the changes?

Oregon's current Intrastate Funding Formula (IFF), approved by ACL in the [2021-2023 State Plan on Aging](#), is below. Language to be deleted or replaced is ~~struck through~~, and new language is in **red font**.

## Oregon State Unit on Aging Intrastate Funding Formula

Oregon's Older Americans Act (OAA) grant award, Oregon Project Independence, and Legislative special purpose appropriations are allocated to individual Area Agencies on Aging based on a combination

of a Base Amount formula, a Land Area formula, and a Population formula on a biennial basis. OAA Sections 305(a)(2)(C) have been met, and criteria set forth in Sections 305(a)(2)(C)(i) and (ii) have been considered and factor weights in Oregon's funding formula are based upon the most current census data released.

## Summary

The *base amount formula* allocates a predetermined amount to each area agency.

The *land area formula* allocates a percentage based on the agency's share of Oregon's total square mileage:

- 5% of Older Americans Act award after subtracting base amount for applicable titles
- 5% of Oregon Project Independence appropriation

The method used to meet the needs for services in rural areas are percentages of the OAA allocation distribution based upon each AAA share of Oregon's total square mileage. The land area formula is used in allocating Title III B, III E and VII funds and Oregon Project Independence.

The *population formula* bases an agency's percentage of the grant allocation on the agency's share of population factors compared to Oregon's total for each factor. The amount allocated based on population is the total amount less allocations for base amount and/or land area where applicable.

The population factors overlap: For example, those who are 75+ are counted once in the 60+ factor and again in the 75+ factor. Those who are in poverty are counted once in the 60+ and again in this separate factor. Similarly, those who are a minority senior 65+ are counted twice (once in the 60+ and once in the factor for minority). The result is that those 75+, minority 65+, and poverty 65+ are weighted twice that of those 60+. If a senior were 75+, minority and in poverty, they would be counted in all four demographic factors.

The number of minority older Oregonians was used in calculating the allocations for Title IIIB, IIIC, IIIE and VII. Minority plus poverty was the primary factor used in allocating Title IIID Preventive Health funds. Each funding source has a separate allocation (supportive services, congregate meals, home delivered meals, family caregiver support, elder abuse prevention, preventive health, Oregon Project Independence and when applicable, Legislative special purpose appropriations). The chart below demonstrates how the three formulas are used to allocate the available funds for the seven programs.

	Biennial Base Amount	Land Area	Population Formula 1	Population Formula 2	Population Formula 3
OAA Title IIIB: Supportive Services	\$55,000	5.0%	remaining 95%	Not used	Not used
OAA Title IIIC-1: Congregate Meals	Not Used \$20,000	Not Used	remaining 100%	Not used	Not used
OAA Title IIIC-2: Home Delivered Meals	Not Used \$5,000	Not Used	remaining 100%	Not used	Not used
OAA Title IIID: Preventive Health	\$3,000	Not Used	Not used	Not used	Not used
Title IIIE: Family Caregiver Support	Not Used	5.0%	Not used	Not used	remaining 95%
Title VII: Elder Abuse Prevention	\$1,000	5.0%	remaining 95%	Not used	Not used
Oregon Project Independence	Not Used	5.0%	remaining 95%	Not used	Not used
Legislative Special Purpose Appropriation	Not Used	Varies depending upon purpose of funds: General use – 5% land, 95% population; health promotion use – \$3K base and Population Formula 2.			



Population Formula 1: (IIIB, IIIC-1, IIIC-2, VIIB, and OPI)

- a. population 60 years and older, plus
- b. population 75 years and older, plus
- c. minority population 65 years and older, plus
- d. poverty population 65 years and older with incomes below 125% of federal poverty level.

Population Formula 2: (IIID)

- a. population 75 years and older, plus
- b. minority population 65 years and older, plus
- c. poverty population 65 years and older with incomes below 125% of federal poverty level.

Population Formula 3: (IIIE)

- a. population 70 years and older, plus
- b. minority population 65 years and older, plus
- c. poverty population 65 years and older with incomes below 125% of federal poverty level.

**Minimum Base Congregate and Home Delivered Allocation:**

~~Because both nutrition titles determine allocation on population alone, Oregon's least populated region tends to receive less than what it costs to provide minimum services. For this reason, a minimum was set for Harney County to guarantee continuation of services. Harney's minimum funding level for congregate meals is \$32,000 and \$4,000 for home-delivered meals. If the population based factors provide less than the minimum to Harney and the minimum is allocated, the additional funding is taken out of all other AAAs funding. The remaining amount is distributed based on the population factors outlined above.~~

Because both nutrition titles determine allocation on population alone, Oregon's least populated regions can receive less than the cost to provide minimum services. For this reason, a base amount is used for the allocation AAAs receive for Congregate Meals (Title IIIC1) and Home Delivered Meals (Title IIIC2). There is a base of \$20,000 for Congregate Meals and a base of \$5,000 for Home Delivered Meals. The remaining amount is distributed based on the population factors outlined above.

**State deductions from Title III Funds:**

Prior to distribution to AAAs under the IFF, the State deducts 5% of the Title III allocation for State Plan Administration. The State also holds \$56,914 per fiscal year from the Title IIIB allocation to distribute to the Long Term Care Ombudsman program. The remainder is then distributed to AAAs via the IFF.

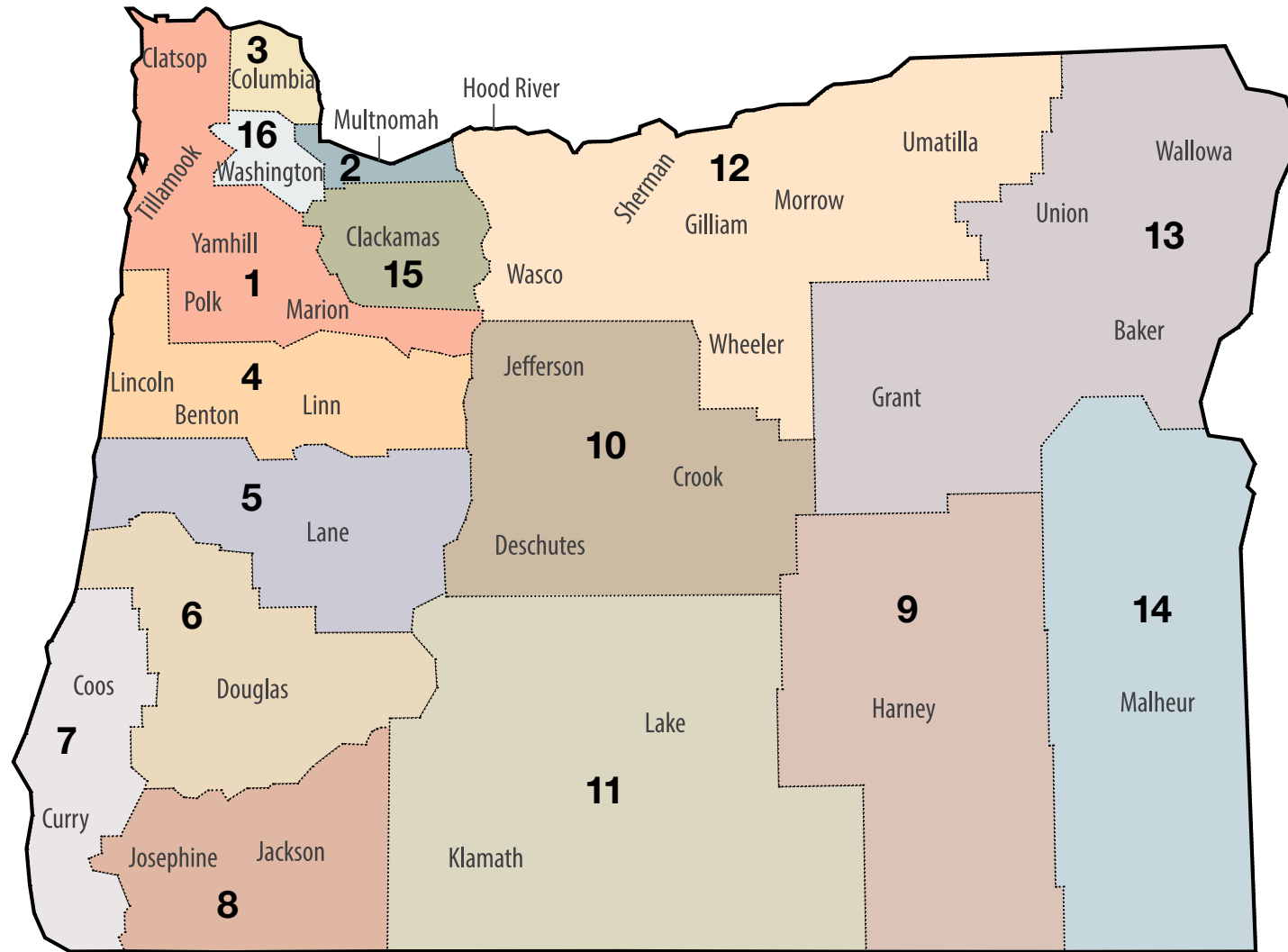
**Nutrition Services Incentive Program (NSIP) fund distribution:**

Oregon disburses NSIP funds to AAA nutrition service programs, and the funding is a proportional share based upon the number of eligible meals served in the prior year. NSIP eligible meals are those meals served to an individual who is qualified to receive services as defined in the OAA. Oregon has chosen, per directive from the US Administration on Aging, to include all OAA and Oregon Project Independence (OPI) congregate and home-delivered meals as NSIP eligible meals.

Oregon's current minimum Title IIIB expenditure requirements for funding for priority services of access, in-home and legal assistance services are:

- Access: 18%
- Legal: 3%
- In-Home: 3%

# Oregon Area Agencies on Aging Planning and Service Areas



1. NWSDS – (Type B Transfer) Northwest Senior & Disability Services	5. LCOG – (Type B Transfer) Lane Council of Governments	9. HCSCS – (Type A) Harney County Senior & Community Services Center	13. CCNO – (Type A) Community Connection of NE Oregon
2. MCADVS – (Type B Transfer) Multnomah County Aging, Disability & Veterans Services	6. DCSS – (Type B Contract) Douglas County Senior Services	10. COACO – (Type A) Council on Aging of Central Oregon	14. MCOACS – (Type A) Malheur Council on Aging and Community Services
3. CAT – (Type A) Columbia Action Team	7. SCBEC – (Type A) South Coast Business Employment Corp.	11. KLCCOA – (Type A) Klamath & Lake Counties Council on Aging	15. CCSS – (Type A) Clackamas County Social Services
4. OCWCOG – (Type B Transfer) Oregon Cascades West Council of Governments	8. RVCOG – (Type B Contract) Rogue Valley Council of Governments	12. CAPECO – (Type A) Community Action Program of East Central Oregon	16. WCDASV – (Type A) Washington County Disability Aging & Veteran Services

# What data is used in the current IFF?

## AAA 2021–2023 Planning Allocation

AAA	District Land Mass (Sq. Miles)	% of Land	For Title IIIB, IIIC1/2, VII Ch. 3, OPI & SPA		For Title IIID & SPA Evidence-Based		For Family Caregiver		2019 NSIP Certified Meals	
			Applicable Population	% of Population	Applicable Population	% of Population	Applicable Population	% of Population	Number of Meals Served in FY 2014	% of Meals Served
CAPECO	11,894	12.4%	53,520	3.5%	16,019	3.6%	66,314	3.5%	111,288	4.7%
CAT	657	0.7%	20,022	1.3%	5,081	1.1%	23,727	1.2%	58,274	2.4%
CCNO	12,780	13.3%	28,987	1.9%	8,367	1.9%	36,577	1.9%	91,034	3.8%
CCSS	1,870	1.9%	160,174	10.5%	39,528	8.8%	186,167	9.8%	228,528	9.6%
COACO	7,778	8.1%	93,281	6.1%	26,053	5.8%	115,775	6.1%	106,906	4.5%
DCSSD	5,036	5.2%	58,454	3.8%	18,075	4.0%	75,661	4.0%	67,030	2.8%
HCSCS	10,133	10.6%	3,590	0.2%	1,051	0.2%	4,511	0.2%	12,834	0.5%
KLCCOA	14,080	14.7%	34,591	2.3%	10,739	2.4%	44,458	2.3%	90,677	3.8%
LCOG	4,553	4.7%	148,169	9.7%	41,504	9.2%	185,123	9.7%	188,579	7.9%
MCADVSD	431	0.4%	229,504	15.0%	71,079	15.8%	286,052	15.0%	526,558	22.1%
MCOACS	9,888	10.3%	12,081	0.8%	4,104	0.9%	15,820	0.8%	16,525	0.7%
NWSDS	4,571	4.8%	211,160	13.8%	64,497	14.3%	267,068	14.0%	266,427	11.2%
OCWCOG	3,946	4.1%	106,126	6.9%	30,860	6.9%	134,387	7.0%	153,489	6.4%
RVCOG	4,423	4.6%	145,899	9.5%	45,700	10.1%	188,124	9.9%	199,038	8.4%
SCBEC	3,224	3.4%	47,750	3.1%	14,878	3.3%	61,904	3.2%	120,763	5.1%
WCDAVS	724	0.8%	174,752	11.4%	52,844	11.7%	215,079	11.3%	145,018	6.1%
<b>Totals</b>	<b>95,988</b>	<b>100.0%</b>	<b>1,528,060</b>	<b>100.0%</b>	<b>450,379</b>	<b>100.0%</b>	<b>1,906,749</b>	<b>100.0%</b>	<b>2,382,968</b>	<b>100.0%</b>

Table 1: Population and land mass data used in the current funding formula



## For OPI 19–59 years of age

For OPI 19-59 years of age				
AAA	Land area Sq. miles	% of Land	Total Population	% of Total Population
CAPECO	11,894	<b>38.9%</b>	53,520	<b>5.0%</b>
LCOG	4,553	<b>14.9%</b>	148,169	<b>13.9%</b>
MCADVSD	431	<b>1.4%</b>	229,504	<b>21.5%</b>
NWSDS	4,571	<b>15.0%</b>	211,160	<b>19.8%</b>
OCWCOG	3,946	<b>12.9%</b>	106,126	<b>9.9%</b>
RVCOG	4,423	<b>14.5%</b>	145,899	<b>13.6%</b>
WCDAVS	724	<b>2.4%</b>	174,752	<b>16.3%</b>
<b>Totals</b>	<b>30,542</b>	<b>100.0%</b>	<b>1,069,130</b>	<b>100.0%</b>

**Population Formula 1 (IIIB, IIIC-1, IIIC-2, VII, and OPI):** a) population 60 years and older, plus b) population 75 years and older, plus c) minority population 65 years and older, plus d) poverty population 65 years and older with incomes below 125% of federal poverty level.

**Population Formula 2 (IIID):** a) population 75 years and older, plus b) minority population 65 years and older, plus c) poverty population 65 years and older with incomes below 125% of federal poverty level.

**Population Formula 3 (IIIE):** a) population 70 years and older, plus b) minority population 65 years and older, plus c) poverty population 65 years and older with incomes below 125% of federal poverty level.

**Table 1: Population and land mass data used in the current funding formula**

B	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
Formulas:								Columns E-J	Columns H-J		Columns F-J	Columns K-N	G-J+M+N	Hand-entered	L+M+N
AAA	County	60-64 Population	65-69 Population	70-74 Population	75-79 Population	80-84 Population	85+ Population	Total 60+ Population	75+ Population	65+ Minority Population 2010 U.S. Census	65+ Poverty Population (ACS 2020 est)	Total Population	70+ & Minor Econ (2020 est)	Land Area Sq. Mi (2010)	75+ 65+Min 65+ Pov
NWSDS	Clatsop	2,697	3,003	2,473	1,647	985	1,081	11,886	3,713	556	595	16,750	7,338	829	4,864
NWSDS	Marion	20,026	17,433	14,990	11,247	7,415	6,654	77,766	25,317	6,682	3,667	113,432	50,656	1,182	35,666
NWSDS	Polk	4,751	4,686	4,118	3,151	2,040	1,748	20,494	6,939	1,291	983	29,706	13,330	741	9,213
NWSDS	Tillamook	2,415	2,453	1,930	1,262	782	656	9,499	2,701	396	320	12,916	5,347	1,103	3,417
NWSDS	Yamhill	7,187	6,499	4,977	3,539	2,212	2,603	27,017	8,354	1,706	1,277	38,355	16,315	716	11,337
AAA total		37,077	34,074	28,488	20,847	13,434	12,743	146,663	47,024	10,631	6,842	211,160	92,985	4,571	64,497
CCSS	Clackamas	36,802	32,245	23,267	13,236	7,728	7,367	120,646	28,331	6,230	4,967	160,174	62,795	1,870	39,528
CAT	Columbia	4,295	3,714	2,920	1,906	1,051	1,055	14,941	4,012	585	484	20,022	8,001	657	5,081
MCADS	Multnomah	45,327	40,688	30,795	18,730	11,147	11,740	158,425	41,616	19,387	10,076	229,504	101,874	431	71,079
WCDAS	Washington	35,205	29,127	22,689	14,808	9,523	10,556	121,909	34,888	13,277	4,679	174,752	75,532	724	52,844
OCWCOG	Benton	5,341	5,618	4,635	3,166	1,940	2,119	22,819	7,225	1,122	920	32,086	13,902	676	9,267
OCWCOG	Lincoln	4,380	4,778	4,151	2,788	1,574	1,341	19,012	5,703	1,054	906	26,674	11,814	980	7,663
OCWCOG	Linn	8,357	7,709	6,692	4,807	3,182	2,689	33,435	10,678	1,605	1,648	47,366	20,623	2,290	13,931
AAA total		18,078	18,105	15,478	10,760	6,696	6,149	75,266	23,605	3,781	3,474	106,126	46,338	3,946	30,860
LCOG	Lane	26,081	26,813	21,531	13,908	8,914	9,418	106,665	32,240	3,228	6,036	148,169	63,035	4,553	41,504
DCSDS	Douglas	8,960	9,331	8,093	6,044	4,015	3,936	40,379	13,995	1,967	2,113	58,454	26,167	5,036	18,075
SCBEC	Coos	5,115	5,371	4,557	3,364	2,176	1,858	22,442	7,398	1,384	1,626	32,850	14,965	1,596	10,408
SCBEC	Curry	2,358	2,668	2,193	1,504	914	794	10,430	3,212	607	651	14,900	6,662	1,627	4,470
AAA total		7,473	8,039	6,750	4,868	3,090	2,652	32,872	10,610	1,991	2,277	47,750	21,628	3,224	14,878
RVCOG	Jackson	15,852	16,052	13,162	9,708	6,832	6,879	68,484	23,418	3,716	3,899	99,517	44,195	2,784	31,033
RVCOG	Josephine	7,141	7,299	6,356	4,698	3,103	3,118	31,715	10,919	1,622	2,126	46,382	21,023	1,640	14,667
AAA total		22,993	23,351	19,518	14,406	9,935	9,996	100,199	34,337	5,338	6,025	145,899	65,218	4,423	45,700

Table 2: Population data used in the current funding formula (Continued below)

B	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
Formulas:								Columns E-J	Columns H-J		Columns F-J	Columns K-N	G-J+M+N	Hand-entered	L+M+N
AAA	County	60-64 Population	65-69 Population	70-74 Population	75-79 Population	80-84 Population	85+ Population	Total 60+ Population	75+ Population	65+ Minority Population 2010 U.S. Census	65+ Poverty Population (ACS 2020 est)	Total Population	70+ & Minor Econ (2020 est)	Land Area Sq. Mi (2010)	75+ 65+Min 65+ Pov
COACO	Crook	1,978	2,205	1,807	1,297	794	693	8,773	2,784	337	241	12,135	5,168	2,979	3,362
COACO	Deschutes	13,041	13,096	10,098	6,857	4,360	4,278	51,729	15,495	1,913	2,450	71,587	29,955	3,018	19,858
COACO	Jefferson	1,812	1,705	1,368	876	574	390	6,726	1,840	696	297	9,559	4,201	1,781	2,833
AAA total		16,831	17,006	13,272	9,029	5,728	5,361	67,228	20,119	2,946	2,988	93,281	39,325	7,778	26,053
KLCCOA	Klamath	4,999	5,152	4,267	3,055	1,907	1,593	20,973	6,555	1,542	1,368	30,438	13,732	5,941	9,465
KLCCOA	Lake	704	733	564	427	251	200	2,879	878	142	254	4,153	1,838	8,139	1,274
AAA total		5,703	5,884	4,831	3,482	2,158	1,793	23,852	7,433	1,684	1,622	34,591	15,570	14,080	10,739
CAPECO	Morrow	901	800	614	402	244	204	3,166	850	326	91	4,433	1,882	2,032	1,267
CAPECO	Umatilla	5,027	4,545	3,377	2,273	1,504	1,417	18,143	5,194	1,623	1,202	26,162	11,396	3,216	8,019
CAPECO	Gilliam	217	206	153	102	67	82	827	250	34	29	1,140	466	1,205	313
CAPECO	Hood River	1,748	1,465	996	695	430	563	5,898	1,689	570	163	8,320	3,418	522	2,422
CAPECO	Sherman	168	149	136	103	56	50	662	209	30	17	918	392	824	256
CAPECO	Wasco	2,046	1,946	1,619	1,078	689	815	8,192	2,582	526	297	11,597	5,023	2,382	3,405
CAPECO	Wheeler	123	141	111	115	67	56	612	237	29	71	950	448	1,715	337
AAA total		10,230	9,254	7,005	4,768	3,056	3,187	37,500	11,011	3,138	1,870	53,520	23,025	11,894	16,019
CCNO	Baker	1,527	1,556	1,271	921	591	515	6,380	2,027	223	223	8,853	3,744	3,068	2,473
CCNO	Grant	730	812	659	511	323	309	3,343	1,143	126	325	4,938	2,253	4,529	1,594
CCNO	Union	1,897	1,971	1,533	1,040	700	793	7,934	2,533	256	301	11,025	4,623	2,037	3,090
CCNO	Wallowa	665	764	578	391	271	294	2,962	956	85	169	4,172	1,788	3,146	1,210
AAA total		4,818	5,102	4,040	2,863	1,885	1,911	20,620	6,659	690	1,018	28,987	12,407	12,780	8,367
HCSCS	Harney	615	633	485	361	230	215	2,539	805	154	92	3,590	1,536	10,133	1,051
MCOACS	Malheur	1,924	1,914	1,559	1,116	691	774	7,977	2,581	965	558	12,081	5,663	9,888	4,104
TOTALS		282,412	265,282	210,721	141,132	89,280	88,854	1,077,681	319,266	75,992	55,121	1,528,060	661,100	95,988	450,379

Table 2: Population data used in the current funding formula

## Data Sources:

Population by age categories from PSU Population Research Center 2020 (April 2021 Population Report)  
Poverty Status in Oregon (2019 5-Year Estimates), Twable S1701  
Minority Population from the 2010 U.S. Census SF1 dataset

## Population Data tab

### **Population by age categories from PSU Population Research Center 2020 Annual Oregon Report (April 2021 Population Report)**

Population Age categories are provided by the Population Research Center at Portland State University (PSU)

You can access this information via the web. Address is listed below:

<https://www.pdx.edu/population-research/search/psu?keys=population%20report>

Table 9 is used to populate the data for ages 60-64, 65-69, 70-74, 75-79, 80-84 and 85+

**Population Cleaned** – Total Population by 5-year age groups; Prepared by Population Research Center, PSU April 2021.

Oregon\_AnnualPop\_Report\_Tables\_2014\_Excel.xlsx; Table 9.

### **Poverty Status in Oregon by Age and by County**

Data Set: 2020 American Community Survey 5-Year Estimates

Survey: American Community Survey

From the U.S. Census Bureau American FactFinder

Table used: S1701: Poverty Status in the Past 12 Months

[http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_10\\_5YR\\_S1701&prodType=table](http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_10_5YR_S1701&prodType=table)

The ACS provides 2011; 1-year estimate updates for Benton, Clackamas, Deschutes, Douglas, Jackson, Josephine, Klamath, Lane, Linn, Marion, Multnomah, Polk, Umatilla, Washington, and Yamhill.

**Population Cleaned** – 65+ Poverty Population percent below poverty; ACS\_13\_5YR\_S1701.xls.

### **Minority 65+ Population**

AGID Oregon 2011-2015 Table S21006 Ace by Race for the Population 60 +

<https://agid.acl.gov/DataGlance/SPR/Trend.aspx?geoids=39&jvar=1687&mode=Count&agegroup=-1&sex=0&pop=0&service=-1&poverty=-1&adl=-1&iadl=-1>

With the assumption the definition of “Minority” includes all individuals who identified as Black, American Indian/Alaska Native, Pacific Islander/Native Hawaiian, Asian, Some other race, 2+ races, or Hispanic.

**Population Cleaned** - 65+ Minority Population; Calculated from the 2010 U.S. Census SF1 dataset for the population 65 years and older. Sum of people 65+ in the following categories: Black, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, Asian, Some other race, 2+ races, and Hispanic.

# How does the proposed formula change (addition of base) affect funding to each AAA?

## No Title III C Base Allocation

AAA	III C1 Congregate Meals	III C2 Home-Delivered Meals	Subtotal of OAA C1 & C2 Titles
CAPECO	\$448,367	<b>\$241,238</b>	\$689,605
CAT	\$167,738	<b>\$90,249</b>	\$257,987
CCNO	\$242,844	<b>\$130,659</b>	\$373,503
CCSS	\$1,341,878	<b>\$721,981</b>	\$2,063,859
COACO	\$781,473	<b>\$420,462</b>	\$1,201,935
DCSSD	\$489,705	<b>\$263,480</b>	\$753,185
HCSCS	\$32,001	<b>\$16,181</b>	\$48,182
KLCCOA	\$289,788	<b>\$155,917</b>	\$445,705
LCOG	\$1,241,303	<b>\$667,868</b>	\$1,909,171
MCADVDS	\$1,922,702	<b>\$1,034,488</b>	\$2,957,190
MCOACS	\$101,213	<b>\$54,456</b>	\$155,669
NWSDS	\$1,769,017	<b>\$951,799</b>	\$2,720,816
OCWCOG	\$889,086	<b>\$478,363</b>	\$1,367,449
RVCOG	\$1,222,287	<b>\$657,637</b>	\$1,879,924
SCBEC	\$400,031	<b>\$215,232</b>	\$615,263
WCDAVS	\$1,464,009	<b>\$787,693</b>	\$2,251,702
<b>Total</b>	<b>\$12,803,442</b>	<b>\$6,887,703</b>	<b>\$19,691,145</b>

## With Title III C Base Allocation

AAA	III C1 Congregate Meals	III C2 Home-Delivered Meals	Subtotal of OAA C1 & C2 Titles	Net Change
CAPECO	\$457,226	\$243,436	\$700,662	\$11,057
CAT	\$183,570	\$94,201	\$277,771	\$19,784
CCNO	\$256,810	\$134,142	\$390,952	\$17,449
CCSS	\$1,328,537	\$718,596	\$2,047,133	<b>(\$16,726)</b>
COACO	\$782,056	\$420,579	\$1,202,635	\$700
DCSSD	\$497,538	\$265,420	\$762,958	\$9,773
HCSCS	\$49,327	\$20,993	\$70,320	\$22,138
KLCCOA	\$302,587	\$159,106	\$461,693	\$15,988
LCOG	\$1,230,461	\$665,111	\$1,895,572	<b>(\$13,599)</b>
MCADVDS	\$1,894,931	\$1,027,470	\$2,922,401	<b>(\$34,790)</b>
MCOACS	\$118,698	\$58,824	\$177,522	\$21,853
NWSDS	\$1,745,063	\$945,744	\$2,690,807	<b>(\$30,009)</b>
OCWCOG	\$886,996	\$477,807	\$1,364,803	<b>(\$2,646)</b>
RVCOG	\$1,211,917	\$654,998	\$1,866,915	<b>(\$13,009)</b>
SCBEC	\$410,092	\$217,732	\$627,824	\$12,561
WCDAVS	\$1,447,634	\$783,544	\$2,231,178	<b>(\$20,524)</b>
<b>Total</b>	<b>\$12,803,443</b>	<b>\$6,887,703</b>	<b>\$19,691,146</b>	<b>\$0</b>

Table 3. Comparison of C1 and C2 AAA allocations with and without a base (Biennial allocation figures)



### No Title IIIC Base Allocation

AAA	IIIB Support Services	IIIC1 Congregate Meals	IIIC2 Home-Delivered Meals	IIID Evidence-Based Health Promotion Services	IIIE Caregiver Services	VII Elder Abuse, Neglect & Exploitation Prevention Activities	Subtotal of OAA Titles	% of OAA Funds	Nutrition Services Incentive Program	% of OAA Funds
CFDA #	93.044	93.045	93.045	93.043	93.052	93.042			93.053	
CAPECO	\$402,464	\$448,367	\$241,238	\$24,711	\$184,983	\$4,380	\$1,306,143	3.7%	\$148,558	4.7%
CAT	\$167,599	\$167,738	\$90,249	\$9,886	\$57,350	\$2,095	\$494,917	1.4%	\$77,790	2.4%
CCNO	\$272,257	\$242,844	\$130,659	\$14,340	\$117,305	\$3,113	\$780,517	2.2%	\$121,521	3.8%
CCSS	\$940,238	\$1,341,878	\$721,981	\$56,573	\$441,903	\$9,611	\$3,512,184	10.1%	\$305,062	9.6%
COACO	\$601,212	\$781,473	\$420,462	\$38,309	\$291,060	\$6,313	\$2,138,829	6.1%	\$142,709	4.5%
DCSSD	\$398,023	\$489,705	\$263,480	\$27,497	\$190,097	\$4,337	\$1,373,139	3.9%	\$89,478	2.8%
HCSCS	\$121,116	\$32,001	\$16,181	\$4,425	\$35,482	\$1,643	\$210,847	0.6%	\$17,132	0.5%
KLCCOA	\$308,888	\$289,788	\$155,917	\$17,554	\$139,011	\$3,470	\$914,628	2.6%	\$121,045	3.8%
LCOG	\$886,834	\$1,241,303	\$667,868	\$59,251	\$446,040	\$9,091	\$3,310,386	9.5%	\$251,734	7.9%
MCADVDS	\$1,313,096	\$1,922,702	\$1,034,488	\$99,334	\$672,999	\$13,237	\$5,055,856	14.5%	\$702,903	22.1%
MCOACS	\$166,465	\$101,213	\$54,456	\$8,562	\$61,445	\$2,084	\$394,224	1.1%	\$22,059	0.7%
NWSDS	\$1,231,674	\$1,769,017	\$951,799	\$90,413	\$638,573	\$12,445	\$4,693,922	13.5%	\$355,654	11.2%
OCWCOG	\$653,943	\$889,086	\$478,363	\$44,825	\$325,368	\$6,826	\$2,398,411	6.9%	\$204,893	6.4%
RVCOG	\$873,814	\$1,222,287	\$657,637	\$64,938	\$452,770	\$8,965	\$3,280,412	9.4%	\$265,696	8.4%
SCBEC	\$331,127	\$400,031	\$215,232	\$23,164	\$153,331	\$3,686	\$1,126,571	3.2%	\$161,207	5.1%
WCDAVS	\$1,014,772	\$1,464,009	\$787,693	\$74,619	\$507,003	\$10,336	\$3,858,432	11.1%	\$193,585	6.1%
<b>Total</b>	<b>\$9,683,521</b>	<b>\$12,803,442</b>	<b>\$6,887,703</b>	<b>\$658,401</b>	<b>\$4,714,720</b>	<b>\$101,632</b>	<b>\$34,849,419</b>	<b>100.0%</b>	<b>\$3,181,026</b>	<b>100.0%</b>

Table 4: All current OAA allocations without a base (Biennial allocation figures)

**With Title IIIC Base Allocation**

<b>AAA</b>	<b>IIIB Support Services</b>	<b>IIIC1 Congregate Meals</b>	<b>IIIC2 Home-Delivered Meals</b>	<b>IIID Evidence-Based Health Promotion Services</b>	<b>IIIE Caregiver Services</b>	<b>VII Elder Abuse, Neglect &amp; Exploitation Prevention Activities</b>	<b>Subtotal of OAA Titles</b>	<b>% of OAA Funds</b>	<b>Nutrition Services Incentive Program</b>	<b>% of OAA Funds</b>
CFDA #	93.044	93.045	93.045	93.043	93.052	93.042			93.053	
CAPECO	\$402,464	\$457,226	\$243,436	\$24,711	\$184,983	\$4,380	\$1,317,200	3.8%	\$148,558	4.7%
CAT	\$167,599	\$183,570	\$94,201	\$9,886	\$57,350	\$2,095	\$514,701	1.5%	\$77,790	2.4%
CCNO	\$272,257	\$256,810	\$134,142	\$14,340	\$117,305	\$3,113	\$797,966	2.3%	\$121,521	3.8%
CCSS	\$940,238	\$1,328,537	\$718,596	\$56,573	\$441,903	\$9,611	\$3,495,458	10.0%	\$305,062	9.6%
COACO	\$601,212	\$782,056	\$420,579	\$38,309	\$291,060	\$6,313	\$2,139,529	6.1%	\$142,709	4.5%
DCSSD	\$398,023	\$497,538	\$265,420	\$27,497	\$190,097	\$4,337	\$1,382,912	4.0%	\$89,478	2.8%
HCSCS	\$121,116	\$49,327	\$20,993	\$4,425	\$35,482	\$1,643	\$232,985	0.7%	\$17,132	0.5%
KLCCOA	\$308,888	\$302,587	\$159,106	\$17,554	\$139,011	\$3,470	\$930,616	2.7%	\$121,045	3.8%
LCOG	\$886,834	\$1,230,461	\$665,111	\$59,251	\$446,040	\$9,091	\$3,296,787	9.5%	\$251,734	7.9%
MCADVDS	\$1,313,096	\$1,894,931	\$1,027,470	\$99,334	\$672,999	\$13,237	\$5,021,067	14.4%	\$702,903	22.1%
MCOACS	\$166,465	\$118,698	\$58,824	\$8,562	\$61,445	\$2,084	\$416,077	1.2%	\$22,059	0.7%
NWSDS	\$1,231,674	\$1,745,063	\$945,744	\$90,413	\$638,573	\$12,445	\$4,663,913	13.4%	\$355,654	11.2%
OCWCOG	\$653,943	\$886,996	\$477,807	\$44,825	\$325,368	\$6,826	\$2,395,765	6.9%	\$204,893	6.4%
RVCOG	\$873,814	\$1,211,917	\$654,998	\$64,938	\$452,770	\$8,965	\$3,267,403	9.4%	\$265,696	8.4%
SCBEC	\$331,127	\$410,092	\$217,732	\$23,164	\$153,331	\$3,686	\$1,139,132	3.3%	\$161,207	5.1%
WCDAVS	\$1,014,772	\$1,447,634	\$783,544	\$74,619	\$507,003	\$10,336	\$3,837,908	11.0%	\$193,585	6.1%
<b>Total</b>	<b>\$9,683,521</b>	<b>\$12,803,443</b>	<b>\$6,887,703</b>	<b>\$658,401</b>	<b>\$4,714,720</b>	<b>\$101,632</b>	<b>\$34,849,420</b>	<b>100.0%</b>	<b>\$3,181,026</b>	<b>100.0%</b>

**Table 5: All OAA allocations with proposed base (Biennial allocation figures)**

# How are Nutrition Services Incentive Program (NSIP) funds distributed?

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The Nutrition Services Incentive Program (NSIP) is funded by a Congressional appropriation to the Administration for Community Living (ACL) and provides grants to states, territories, and eligible Tribal organizations to support the Older Americans Act (OAA) Congregate and Home-Delivered Nutrition Programs by providing an incentive to serve more meals. NSIP funds may only be used to purchase agricultural and other food products.

Oregon disburses NSIP funds to AAA nutrition service programs, and the funding is a proportional share based upon the number of eligible meals served in the prior year. NSIP eligible meals are those meals served to an individual who is qualified to receive services as defined in the OAA.

Oregon has chosen, per directive from the US Administration on Aging, to include all OAA and Oregon Project Independence (OPI) congregate and home-delivered meals as NSIP eligible meals. The ACL distributes to Oregon approximately 75% of the appropriation during the first quarter of the federal fiscal year, followed by another appropriation in the third quarter and the remainder of funds during the fourth quarter. To assist AAAs in preparing a biennial budget, the State of Oregon will continue to forecast any expected, but not yet received, funding amounts based upon the prior federal fiscal years meal count and will continue to include this amount in the biennial allocation workbooks. As actual dollars are received the allocation amount will be revised accordingly.

# Does the State, prior to distribution to the AAAs under the IFF, deduct funds from Title III funds for: State Plan Administration, Area Plan Administration, and/or Long Term Care Ombudsman allocations?

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Prior to distribution to AAAs under the IFF Oregon deducts 5% of the Title III allocation for State Plan Administration. The State also holds \$56,914 (a fixed amount) per fiscal year from the Title

IIIB allocation to distribute to the Long Term Care Ombudsman program. The remainder is then distributed to AAAs via the IFF.



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