



**DARS**  
VIRGINIA DEPARTMENT FOR AGING  
AND REHABILITATIVE SERVICES  
*Supporting Virginians' efforts  
to secure independence and employment*



**ACL IFF GUIDANCE  
ACL FEEDBACK ON VIRGINIA'S IFF**

July 25, 2022  
10:00 a.m. – 2:00 p.m.

**ACL IFF GUIDANCE**



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## ACL Guidance on IFFs

- All IFFs must contain the following:
  - A descriptive statement of the formula.
  - A list of the data used by planning and service area.
  - A descriptive statement of each factor (i.e. 70+ living alone – number of people who are 70 and older that live alone) and weight/percentage used for each factor (i.e. 70+ living alone = 5%).



## ACL Guidance on IFFs

- All IFFs must contain the following:
  - Allocations of funds by planning and service area based on the IFF segmented by Part of Title III (e.g., chart of PSA X, IIIB Supportive Services, \$900,000).
  - States must provide the source of the data used to run in the IFF. States must use the “best available data.” In most cases, the best available data is the most current US Census. A state also may use more recent US Census estimates from the American Community Survey; other more recent data of equivalent quality available in the State also may be considered.



## ACL Guidance on IFFs

- All IFFs must contain the following:
  - A numerical/mathematical statement of the formula is required for Parts B, C, D and E.
  - A separate descriptive and numerical/mathematical statement may be provided for Title III Part D – Evidence Based Disease Prevention and Health Promotion Services, to target the medically underserved and which there are a large number of older individuals who have the greatest economic need for such services, per Section 362 of the OAA. If a separate formula is used for Part D, a separate descriptive and numerical/mathematical statement is required.



## ACL Guidance on IFFs

- All IFFs must contain the following:
  - A statement explaining how NSIP funds are distributed.
  - States may use a base amount in their IFFs to ensure viable funding across the entire state.
  - Statement that discloses if, prior to distribution under the IFF to the AAAs, funds are deducted from Title III funds for: State Plan Administration, Area Plan Administration, and/or Long Term Care Ombudsman allocations.
  - The IFF should include information on how the formula affects funding to each planning and service area.



## ACL FEEDBACK ON VIRGINIA'S IFF



## ACL Guidance

Current IFF	ACL Guidance & Status
<b>State Plan Administration</b>	<p><u>ACL Guidance</u>: Current IFF is missing a statement describing process for state plan administration allocations</p> <p><u>DARS</u>: Added to the version provided today</p>
<b>Spending on Priority Services</b>	<p><u>ACL Guidance</u>: Not a required element</p> <p><u>DARS</u>: Removed from the version provided today</p>
<b>Cost Sharing/Fee for Services (FFS)</b>	<p><u>ACL Guidance</u>: Not a required element</p> <p><u>DARS</u>: Removed from the version provided today</p>



## ACL Virginia-Specific Feedback

Current IFF	ACL Feedback & Status
<b>Inclusion of Title VII (Elder Rights and Ombudsman)</b>	<u>ACL</u> : Should not be included in the IFF <u>DARS</u> : Removed from the version provided today, see separate handout
<b>Transfers</b>	<u>ACL</u> : Should not be done before running the formula and should not be included in the IFF <u>DARS</u> : Still included in the version provided today for context
<b>Base</b>	<u>ACL</u> : The base tied to data/allocations from 2012 is too dated to be approved, ACL will look closely at base figures <u>DARS</u> : Still included in the version provided today for context



## ACL Virginia-Specific Feedback

Current IFF	ACL Feedback & Status
<b>Mathematical Expression of the Formula</b>	<u>ACL</u> : Current IFF is missing the mathematical expression <u>DARS</u> : Not included or added to the version provided today
<b>NSIP Allocation</b>	<u>ACL</u> : Current IFF in the State Plan is missing the explanation of NSIP allocations <u>DARS</u> : Added to the version provided today
<b>Hold Harmless</b>	<u>ACL</u> : The hold harmless tie in to data/allocations from 2006 is too dated to be approved <u>DARS</u> : Still included in the version provided today for context



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