Attachment C
DRAFT WISCONSIN STATE AGING PLAN
FINANCIAL PLAN and INTRASTATE FUNDING

This Financial Plan describes and documents the procedures undertaken to distribute Wisconsin's Title III allocations to its Area Agencies on Aging for distribution to service providing agencies. In Wisconsin, as directed by the Wisconsin Elders Act, the primary service providing agencies to which Title III service funds are distributed are local aging units. Each county and federally designated tribal nation designates an entity to serve in this capacity, and the AAAs contract with those entities to arrange for direct services to their eligible county and tribal populations.

Part 1 of this Financial Plan details the sequential methodology for distributing funds, including information about procedures that distribute statutorily-specified administrative and operating funds prior to allocating service funds to AAAs.

Part 2 explains in detail the targeting principles that underlie the formulas used to allocate funds to AAAs for distribution to local aging units. The 2023-25 State Aging Plan proposes a change to the population factors driving Wisconsin's funding allocations, and Part 2 explains the rationale for the change; describes the stakeholder engagement process that produced the new formulas; details the proposed population factors, factor weights, and methods for minimizing dramatic funding shifts; and demonstrates the results of implementing the new formulas for allocating the anticipated 2023 Title III awards.

Part 3 provides required assurances that Wisconsin's financial plan operation aligns with Older Americans Act requirements and principles, and addresses additional considerations related to voluntary contributions and public review of the Financial Plan.

Part 1: Sequential Operations for Distribution of Funds

The execution of Wisconsin's population-based formulas takes place relatively late in a sequence of steps that also establish funding levels for other aspects of Older Americans Act network operations in Wisconsin. These steps address support for administration of the State Unit on Aging, operation of the data collection and management software through which program activity is tracked and reported, administration of the three Area Agencies on Aging, the State Long Term Care Ombudsman Program, and the state's 11 federally recognized Tribal Nations. These distribution procedures are outlined here to ensure that the allocation process is fully documented.

Administrative Considerations Preceding Formula Distribution to AAAs

Before the AAA allocation methodology is applied to the federal Title III allotment for Wisconsin, five percent of the total is designated to support the designated State Unit on Aging, the Bureau of Aging and Disability Resources, for administration of the State Plan. This process is described and illustrated in **Table 1**.

Table 1. Calculation of Administrative Funds for the State Unit on Aging	
ABBREVIATIONS	
FedB$	Total Federal TIII-B Dollars Awarded to State of Wisconsin FFY
StateAdminB$	Portion of 5% allowable state administrative funds allocated to the III-B program
FedC1$	Total Federal TIII-C1 Dollars Awarded to State of Wisconsin FFY
StateAdminC1$	Portion of 5% allowable state administrative funds allocated to the III-C1 program
FedC2$	Total Federal TIII-C2 Dollars Awarded to State of Wisconsin FFY
StateAdminC2$	Portion of 5% allowable state administrative funds allocated to the III-C2 program
FedD$	Total Federal TIII-D Dollars Awarded to State of Wisconsin FFY
FedE$	Total Federal TIII-E Dollars Awarded to State of Wisconsin FFY
StateAdminE$	Portion of 5% allowable state administrative funds allocated to the III-E program
State administrative funds are calculated independently for each program:	
StateAdminB$	=ROUND((FedB$*0.05)+(FedD$*0.05*(FedB$/(FedB$+FedC1$+FedC2$))),0)
StateAdminC1$	=ROUND((FedC1$*0.05)+(FedD$*0.05*(FedC1$/(FedB$+FedC1$+FedC2$))),0)
StateAdminC2$	=ROUND((FedC2$*0.05)+(FedD$*0.05*(FedC2$/(FedB$+FedC1$+FedC2$))),0)
StateAdminD$	State administration for TIII-D is proportionately allocated from the B, C1 and C2 programs
StateAdminE$	=ROUND((FedE$*0.05),0)
The resulting dollar amounts are summed to ensure that they total less than 5% of funds awarded.	

Statewide Contract for Aging Program Reporting

The State Unit on Aging mandates the use of an aging program reporting system (in 2022, this program is with Wellsky/SAMS) for reporting all Title III and related activities in Wisconsin, for purposes of standardized and consistent data collection contributing to the state NAPIS report as well as for analytic and planning purposes. As these costs are mandated, the Area Agencies on Aging and the State Unit on Aging maintain an agreement that these costs are designated as part of the AAA administrative funds calculations, prior to calculating individual AAA allocation amounts. This agreement is in the form of a Memorandum of Understanding (MoU) between the State Unit on Aging and all three AAAs.

Title III Funds and Area Agency on Aging Administration

The distribution of administrative funds to Area Agencies on Aging is determined using the same methodology as in past State Plans. The total available for distribution to the Area Agencies on Aging is established through a calculation that begins with the total Title III funds remaining after State Unit on Aging administrative funding has been subtracted.

The administrative funds to Area Agencies on Aging are calculated independently for each part of Title III, except Title III-D. Rather than distributing administrative funds from Title III-D, the awarded amount for Title III-D is included in the calculations used in determining the Area Agencies on Aging administrative funds distributed from Title III-B, Title III-C1, Title III-C2, and Title III-E. This allows each Area Agency on Aging to receive administrative funds from the Older Americans Act without decreasing the very small total of programmatic funds available in Title III-D.

Once the amounts available from each Title III program are calculated, the amounts are summed to calculate the total available Area Agencies on Aging administrative funds. From this total, each Area Agency on Aging is allocated a base amount of $75,000, the sum of which is drawn proportionally from the total available funds associated with Titles IIIB, C1, C2, and E. After the base amounts are set aside, the contractual amount needed to fund the mandated aging program reporting system under the MoU is subtracted. The remaining funds available for area plan administration are distributed among the Area Agencies on Aging according to the following sequence of procedures:

Fifty percent of the funds is distributed based on the number of county or tribal Aging Units served by the AAA (this measure applies only to multi-county AAAs; at present, GWAAR is the only affected agency). Forty percent of the funds shall be distributed based on the AAA's proportion of the state's total low-income population (individuals at or below 100 percent of the poverty level) aged 60 and over across the area served by the area agency. Ten percent of the funds shall be distributed based on the proportion of the state's total non-white, non-Hispanic population aged 60 and over in the area served by the AAA.

This formula and explanatory notes follow as **Table 2.**

Table 2. State Area Agency on Aging Administrative Calculations	
ABBREVIATIONS	
AAAadminB$	AAA admin amount distributed from Title III-B
AAAadminC1$	AAA admin amount distributed from Title III-C1
AAAadminC2$	AAA admin amount distributed from Title III-C2
AAAadminD$	AAA admin amount distributed from Title III-D
AAAadminE$	AAA admin amount distributed from Title III-E
BalafterSUAAdmin B$	Balance remaining after State admin is taken from award
BalafterSUAAdmin C1$	Balance remaining after State admin is taken from award
BalafterSUAAdmin C2$	Balance remaining after State admin is taken from award
BalafterSUAAdmin E$	Balance remaining after State admin is taken from award
balafterbase$	Balance remaining after base amounts are allocated to each AAA
balafterRepSys$	Balance remaining after Aging Program Reporting System is subtracted for subcontract through GWAAR
SubcontractAmt	Subcontract Amount to fund the Aging Program Reporting System
AAA#units$	50% of total AAAadmin$ after base is reduced goes to GWAAR-AAA
AAA60MIN$	40% of the states' population aged 60 and older who are minorities
AAA60POV$	10% percentage of the states' population aged 60 and older living in households below the poverty line
CO60minGWAAR	GWAAR AAA percentage share of 60+ minority population summed by each CAU
CO60minDane	Dane AAA percentage share of 60+minority population
CO60minMilw	Milwaukee AAA percentage share of 60+minority population
CO60minTribes	Tribal percentage share of 60+minority population
CO60povGWAAR	GWAAR AAA percentageshare of 60+ under 100% povery population summed by each CAU
CO60povDane	Dane AAA percentage share of 60+ under 100% poverty population
CO60povMilw	Milwaukee AAA percentage share of 60+ under 100% poverty population
CO60povTribes	Tribal percentage share of 60+ under 100% povery population
CAU	County Aging Unit
TAU	Tribal Aging Unit

Table 2, continued. State Area Agency on Aging Administrative Calculations
STEP ONE
State area agency on aging funds are calculated independently for each program after the costs for Aging Program Reporting System licenses and administration are subtracted: **AAAadminB$** =ROUND((BalafterSUAAdminB$*0.0975)+(FedD$*0.0975* (BalafterSUAAdminB$/(BalafterSUAAdminB$+BalafterSUAAdminC1$+BalafterSUAAdminC2$))),0) **AAAadminC1$** =ROUND((BalafterSUAAdminC1$*0.0975)+(FedD$*0.0975* (BalafterSUAAdminC1$/(BalafterSUAAdminB$+BalafterSUAAdminC1$+BalafterSUAAdminC2$))),0) **AAAadminC2$** =ROUND((BalafterSUAAdminC2$*0.0975)+(FedD$*0.0975* (BalafterSUAAdminC2$/(BalafterSUAAdminB$+BalafterSUAAdminC1$+BalafterSUAAdminC2$))),0) **AAAadminD$** AAA plan administration for TIII-D are proportionately allocated from B, C1 and C2 programs **AAAadminE$** =ROUND((BalafterSUAAdminE$*0.0975),0)
STEP TWO
Determine the AAA admin balance after base of $75,000 is put aside for each AAA **balafterbase$**=AAAadmin$ - (75,000+75,000+75,000)
STEP THREE
Determine the AAA admin balance after funding for Aging Program Reporting System is set aside for subcontract through GWAAR **balafterRepSys$**=balafterbase$ - SubcontractAmt
STEP FOUR
Allocate balance after base and subcontract amounts are subtracted by pre-determined percentages **AAA#units$**=ROUND(balafterRepSys$*.50,0) **AAA60MIN$**=ROUND(balafterRepSyse$*.40,0) **AAA60POV$**=ROUND(balafterRepSys$*.10,0)

Table 2, continued. State Area Agency on Aging Administrative Calculations
STEP FIVE
Allocate amounts available to each AAA **GWAAR AAA:** =(AAA#units$*CAU's/(CAU's+TAU's),0)+(AAA60MIN$*(CO60minGWAAR)) +(AAA60POV$*(CO60povGWAAR))+75,000+SubcontractAmt **Tribal Technical Assistance Center Allocation:** (awarded to GWAAR for administration of TAUs) =(AAA#units$*TAU's/(CAU's+TAU's),0)+(AAA60MIN$*(CO60minTribes)) +(AAA60POV$*(CO60povTribes)) **Dane AAA:** =(AAA60MIN$*CO60minDANE)+(AAA60POV$*CO60povDANE)+75,000 **Milwaukee AAA:** =(AAA60MIN$*(CO60minMilw)+(AAA60POV$*(CO60povMilw)+75,000

Title III Funds and the State Long Term Care Ombudsman Program

As a next step before the funding allocation methodology is applied, a specified amount of Title III-B funds shall be awarded to the Board on Aging and Long Term Care for the support of a statewide long-term care ombudsman program which meets the requirements of the Older Americans Act. The Title III-B funding level for SFY 2022 is $65,000. Subsequent funding levels will be determined through the State budget process.

The "Tribal Set-Aside": Funding for Title III/Title VI Collaboration

After Ombudsman program support has been subtracted from the Title III award, the total remaining is available for allocation to AAAs and subsequent distribution to local aging units administered by Wisconsin's counties and tribes. As a first step in this process, a portion of remaining Title IIIB, C1, C2 and D funds are **set aside** to be used later in allocations to the state's 11 federally recognized Tribal Nations. This amount is calculated by taking the prior year's tribal set-aside amount for the program area and adjusting it by the percent change in the program award allocated to the state of Wisconsin. If the amount calculated for the tribal set-aside decreases due to a decrease in the federal award received by Wisconsin, additional funds will be drawn from that program area's total available for allocation to keep the tribal allocation to a 1993 hold harmless level.

Along with the tribal set-aside, the amount to be allocated to the tribes includes the funding levels for Menominee County, 85% of whose population is Native. Menominee County's allocation is determined by the execution of the AAA and county funding distribution formulas. Based upon a historic agreement among representatives of the state's 11 tribes, the full amount of each program fund designated for Menominee County is added to the tribal set-aside to enhance the fund available for distribution to all tribes.

The combined tribal total for each program fund (the set-aside plus Menominee County's total) is then designated based on each Tribe's share of the number of tribal members age 60 and over as reported by each Tribe to ACL in their applications for Title VI funds. This is the only population-based formula factor employed in the tribal distribution formula because it is the only data element available for the target population. Census Bureau sources do not tabulate data relating to the social and economic characteristics of those age 60 and older with membership in a Tribe. The resulting totals are adjusted if necessary to achieve a minimum distribution for each tribe of $8,000 of Title IIIB funds. No minimum amount is established for the tribal distribution of Title III C1, C2, or D funds.

It is important to note that the methodology for designating funds to the Tribes will not change as a result of the proposed changes, described below in Part 2 of this Financial Plan, in the population factors that drive the allocation of funds to AAAs and their distribution to counties. Because the distribution formulas for tribes include only a single population factor (age 60 and older) which is not under scrutiny, these formulas will remain the same under the amended Intrastate Funding Formula. However, because the proposed county distribution formulas is projected to result in increased distributions to Menominee County in each program area, the related funds available for distribution to tribes is expected to increase. As detailed below in **Table 9**, the cumulative increase in funds for Menominee County will total $38,606, or 72.3 percent more than the total distributed in 2022. The total increase available for distribution to the tribes will be slightly lower because only Menominee receives Title III-E funding through its county status (the remaining tribes receive caregiver support funds through Title VI only). An increase of approximately seven percent is anticipated in the total fund available for distribution to tribes. Summary results based on 2022 preliminary funding levels are presented in **Table 3**.

In sum, the procedures for the Tribal Distributions are as follows:

1. Before AAA allocations and associated county distributions are calculated, a portion of funds from Titles III-B, III-C1, III-C2, and III-D is set aside for distribution to the Tribal Aging Units based on the percent change in the total awards to Wisconsin and the prior year's tribal set-aside amount, with the original set-aside amount determined by a historical hold harmless total established in 1993.
2. The AAA allocations and county distributions are calculated, and the dollar amount designated for Menominee County for each part of Title III is added to the foregoing set-aside amount. Menominee County's designation is treated in this way due to a historic agreement among the tribes, and is based on the racial-ethnic composition of the county's population (85 percent of residents are identified through the U.S. Census as American Indian-Alaska Natives).
3. The combined total for each part of Title III is distributed to Tribal Aging Units based on each Tribe's share of the total Tribal population age 60 and older, as reported by Tribes in their Older Americans Act Title VI applications.

For the 2022 preliminary award this approach, in which Menominee County's total is calculated using the previously approved formula factors, is projected to result in the following estimated distribution amounts:

Table 3. Tribal Distributions in 2022 Based on 2021 Award

TRIBE	III-B	III-C-1	III-C-2	III-D	III-E	TOTAL
HoChunk	$27,143	$18,609	$26,272	$1,352		$73,376
Menominee	$42,343	$29,028	$40,983	$2,110	$5,000	$119,464
Oneida	$40,014	$27,771	$38,225	$1,967		$107,977
Stockbridge-Munsee	$15,563	$11,797	$9,655	$497		$37,512
Bad River Chippewa	$8,889	$6,097	$8,604	$443		$24,033
Lac Courte Oreilles	$19,475	$13,352	$18,850	$970		$52,647
Lac du Flambeau	$20,086	$13,771	$19,441	$1,000		$54,298
Potawatomi	$8,527	$3,164	$4,466	$230		$16,387
Red Cliff	$14,502	$7,630	$10,771	$554		$33,457
St Croix Chippewa	$11,672	$8,002	$11,297	$581		$31,552
Sokaogan-Chippewa	$8,555	$2,234	$3,153	$162		$14,104
Totals	$216,769	$141,455	$191,717	$9,866	$5,000	$564,807

Population-Based Allocation Formulas: Structure and Operation

After the procedures above are completed (up to and including the extraction of the tribal set-aside), the funds remaining are subject to a set of population-based funding formulas that determine their allocation to AAAs and the subsequent distribution to local aging units. Funds for each part of Title III are distributed by a formula customized for the circumstances of that program, with a goal of making the targeting logic of the formulas (and therefore the weighting of their population factors) as consistent as possible. The operation of each formula follows the same sequence of steps to ensure that the protections described above are applied and that AAA allocations to supply county and tribal distributions are impacted as little as possible in a given year. Following in **Table 4** is a summary of the five funding formulas and the steps through which procedures are applied.

Table 4. Summary of Allocation Formulas

ABBREVIATIONS	
Statex$	State Title III-x funds available for distribution to County aging units (after deducting amount for tribes).
InitialCty$	County dollar result of allocating III-x dollars based on IFF %'s. For each county this dollar amount is used when calculating the result of adjustment #1 and 2.
TempCty$	County dollar result of applying adjustments #1 & #2. This dollar amount is used when calculating adjustment #3 (bring to minimum).
CO60	The county's percentage of the states' population aged 60 and older.
CO60MIN	The county's percentage of the states' population aged 60 and older who are nonwhite and non-Hispanic.
CO60POV	The county's percentage of the states' population aged 60 and older living in households below the poverty line
CO60LA	The county's percentage of the states' population aged 60 and older and living alone
RURAL	If county is designated as rural then 10% factor applied here (rural is less than 20 people per square mile). 10% of State IIIx funds set aside and divided among all counties deemed as rural.
PYA95	95% of the county's prior year allocation
PYA110	110% of the county's prior year allocation
FinalCty$	Final dollar amount of funding distributed to AAA for allocation to County aging unit

DATA SOURCES FOR POPULATION FACTORS	Population
U.S Bureau of the Census - Annual Estimates July 2017	60+Population
U.S Bureau of the Census - Annual Estimates July 2017 for Total 60+ Population	60+ Minority Population
American Community Survey 5 Year Estimates - 2011-2015 Special Tabulation on Aging	60+ Under 100% poverty
American Community Survey 5 Year Estimates - 2011-2015 Special Tabulation on Aging	60+ Living Alone
U.S Bureau of the Census - Annual Estimates July 2017	
Any county that has 20 persons or fewer of those ages 60+ per square mile	Rural County

Allocation of Title IIIB Funds to AAA for Distribution to Aging Units

STEP ONE

First determine the initial county dollar amounts -

InitialCty$=CO60(StateB$*.45)+CO60MIN(StateB$*.15)+CO60POV(StateB$*.20)+CO60LA(StateB$*.10)+RURAL(StateB$*.10)

Table 4, continued. Summary of Allocation Formulas

STEP TWO

Apply the 3 adjustments (Hold Harmless, Max Hold, Minimums)
Adjustment 1 (Adj) Hold Harmless - Award at least 95% of Prior Year Allocation (PYA) (phases out in 2025)

`=IF(InitialCty$>PYA95,0,(PYA95-InitialCty$))`

Adjustment 2-Max Hold - Award no more than 110% of PYA (phases out in 2025)

`=IF(InitialCty$<PYA110,0,(PYA110-InitalCty$)))`

Adjustment 3 Minimum - Bring to Minimum of $20,000

`=IF(TempCty$<20000,(20000-TempCty$),0)`

STEP THREE

Apply result of 3 adjustments

`FinalCty$ = InitialCty$+(Adj1-Adj2+Adj3)`

This process is a manual process where amounts calculated using check and balance formulas written into the allocation spreadsheet are applied to the main calculation until all the award is appropriately allocated.

Allocation of Title IIIC-1 Funds to AAA for Distribution to Aging Units

STEP ONE

Determine the initial county dollar amounts -
`InitialCty$=CO60(StateC1$*.45)+CO60MIN(StateC1$*.15)+CO60POV(StateC1$*.20)+CO60LA(StateC1$*.10)+RURAL(StateC1$*.10)`

STEP TWO

Apply the 3 adjustments (Hold Harmless, Max Hold, Minimum)
NOTE for C1 - Wisconsin Statute 46.80(5)(a) requires that any county aging units who received congregate dining funds
prior to July 1, 1977, may not be allocated an amount less than the 1976-77 allocation. This applies to two counties.
Adjustment 1 Hold Harmless- Award at least 95% of Prior Year Allocation (PYA) (phases out in 2025)

`=IF(InitialCty$>PYA95%,0,(PYA95%)-InitialCty$))`

Adjustment 2 Max Hold- Award no more than 110% of PYA (phases out in 2025)

`=IF(InitialCty$<PYA110%,0,(PYA110%-InitialCty$)))`

Adjustment 3A - Minimums applied due to application of Wisconsin Statute 46.80(5)(a).

Adjustment 3B - Minimum - Bring to Minimum of $50,000

`=IF(TempCty$<50000,(50000-TempCty$),0)`

STEP THREE

Apply result of 3 adjustments

`FinalCty$ = InitialCty+(Adj1-Adj2+Adj3special+Adj4)`

This process is a manual process where amounts calculated using check and balance formulas written into the allocation spreadsheet are applied to the main calculation until all the award is appropriately allocated.

Table 4, continued. Summary of Allocation Formulas

Allocation of Title IIIC-2 Funds to AAA for Distribution to Aging Units

STEP ONE

Determine the initial county dollar amounts -
InitialCty$=CO60(StateC2$*.35)+CO60MIN(StateC2$*.15)+CO60POV(StateC2$*.20)+CO60LA(StateC2$*.20)+RURAL(StateC2$*.10)

STEP TWO

Apply the 3 adjustments (Hold Harmless, Max Hold, Minimum)
Adjustment 1 Hold Harmless - Award at least 95% of Prior Year Allocation (PYA) or no less than 5% of PYA (phases out in 2025)

=IF(InitialCty$>PYA95%,0,(PYA95%)-InitialCty))
Adjustment 2 Max Hold - Award no more than 110% of PYA or no more than 10% of PYA (phases out in 2025)

=IF(InitialCty$<PYA110%,0,(PYA110%-InitialCty)))

Adjustment 3 Minimum - Bring to Minimum of $10,000

=IF(TempCty$<10000,(10000-TempCty),0)

STEP THREE

Apply result of 3 adjustments

FinalCty$ = InitialCty$+(ADJ1-ADJ2+ADJ3)

This process is a manual process where amounts calculated using check and balance formulas written into the allocation spreadsheet are applied to the main calculation until all the award is appropriately allocated.

Allocation of Title IIID Funds to AAA for Distribution to Aging Units

STEP ONE

Determine the initial county dollar amounts -
InitialCty$=CO60(StateD$*.45)+CO60MIN(StateD$*.15)+CO60POV(StateD$*.20)+CO60LA(StateD$*.10)+RURAL(StateD$*.10)

STEP TWO

Apply the 3 adjustments (Hold Harmless, Max Hold, Minimum)
Adjustment 1 Hold harmless - Award at least 95% of Prior Year Allocation (PYA) (phases out in 2025)

=IF(InitialCty>PYA95%,0,(PYA95%)-InitialCty))

Adjustment 2 -Max Hold- Award no more than 110% of PYA (phases out in 2025)

=IF(InitialCty<PYA110%,0,(PYA110%-InitialCty)))

Adjustment 3 Minimum- Bring to Minimum of $2,000

=IF(TempCty<2000,(2000-TempCty),0)

STEP THREE

Apply result of 3 adjustments

FinalCty$ = InitialCty$+ADJ1-ADJ2+ADJ3

This process is a manual process where amounts calculated using check and balance formulas written into the allocation spreadsheet are applied to the main calculation until all the award is appropriately allocated.

Table 4, continued. Summary of Allocation Formulas
Allocation of Title IIIE Funds to AAA for Distribution to Aging Units
STEP ONE
Determine the initial county dollar amounts - InitialCty$=CO60(StateE$*.45)+CO60MIN(StateE$*.15)+CO60POV(StateE$*.20)+AGED(StateE$*.10)+RURAL(StateE$*.10)
STEP TWO
Apply the 3 adjustments (Hold Harmless, Max Hold, Minimum) **Adjustment 1 - Award at least 95% of Prior Year Allocation (PYA) (phases out in 2025)** =IF(InitialCty$>PYA95%,0,(PYA95%)-InitialCty$)) **Adjustment 2 - Award no more than 110% of PYA (phases out in 2025)** =IF(InitialCty$<PYA110%,0,(PYA110%-InitialCty$))) **Adjustment 3 - Bring to Minimum of $10,000** =IF(TempCty$<10000,(10000-TempCty$),0)
STEP THREE
Apply result of 3 adjustments FinalCty$ = InitialCty$+(ADJ1-ADJ2+ADJ3) This process is a manual process where amounts calculated using check and balance formulas written into the allocation spreadsheet are applied to the main calculation until all the award is appropriately allocated.

Anticipated Annual Updates

Future periodic adjustments to funding levels will occur as demographic change alters the share of the state's population with relevant characteristics residing in each county and tribe. All population data will be updated annually in alignment with Census Bureau data releases, using annual population estimates by age and race/ethnicity from the U.S. Bureau of the Census Population Estimates, and social and economic characteristics data from the American Community Survey Five-Year files and the Administration on Aging's AGID (Aging, Independence, and Disability) tabulation for age 60 and older. For tribes, population data submitted to ACL as part of the Title VI application will be used. Formulas will incorporate data from the most recent period available when funding projections are produced in late summer each year.

Accommodating changes in federal distribution of funds

In the event of year-to-year changes in the federal awards distributed to Wisconsin under Title III during the three-year plan period, there may be similar statewide increases or decreases in the amount distributed to aging units through each allocation formula. Any across-the-board federal increase or decrease in Title III will impact the funds available for distribution through the AAA allocation formulas under Title III.

Formula-driven funding levels for 2023

Before presenting the anticipated results for AAAs and aging units of operating the above funding formulas (which will follow in **Tables 8 and 9** below), **Part 2** of this Financial Plan explains why and how the population factors in the formulas have changed since Wisconsin's previous State Plan and describes how the new factors will improve the targeting of funds to support communities in greatest need.

Nutrition Services Incentive Program (NSIP)

Nutrition Services Incentive Program (NSIP) funds are distributed proportionally to each of Wisconsin's AAAs based on the share of eligible Congregate and Home Delivered meals served within each AAA in the prior calendar year.

Part 2: Updating the Population-Based Formula Factors in 2022

This section of the Financial Plan explains and documents Wisconsin's intent to transition Older Americans Act program funding to a new set of intrastate allocation formulas in 2022, for the distribution of Older Americans Act/State funds beginning in 2023. Both the previous formulas and the proposed formulas were created in accordance with Older Americans Act targeting principles, and specifically with the requirements as listed in Section 305 (a) (2):

> *"(C) in consultation with area agencies, in accordance with guidelines issued by the Assistant Secretary, and using the best available data, develop and publish for review and comment a formula for distribution within the State of funds received under this title that takes into account—*
>
> > *(i) the geographical distribution of older individuals in the State; and*
> > *(ii) the distribution among planning and service areas of older individuals with greatest economic need and older individuals with greatest social need, with particular attention to low-income minority older individuals."*

The impetus for a change in Wisconsin's allocation formulas stems from changes in the nationwide collection of data by the U.S. Bureau of the Census, which resulted in decreased accuracy and increased volatility of county-level information about the poverty status of persons age 65 and older. As described in detail below, BADR carried out an extensive analysis of the consequences of this change, presented findings widely at Aging Network PSA meetings, convened a workgroup including all AAAs and volunteers from county and tribal aging units, discussed plans with AAA leadership and governing committees, and created a revised approach to the distribution of funds. The new allocation formulas reduce the impact of the volatile poverty data, introduce a more consistent weighting of the targeting data points across all program formulas, and result in more stable and reliable distribution of funds over time.

After preliminary review by the Administration for Community Living and consequent revisions, the proposed formulas were presented and their financial consequences explained in detail to the statewide Aging Advisory Council, to AAA and Aging Unit directors at Aging PSA meetings, and in focused discussions with Area Agency on Aging leadership. The proposed Financial Plan amendment was published on the State Unit on Aging website and an announcement seeking public comment was circulated via the state's aging network listserv, Badgeraginglist.

The approved allocation formulas will be implemented in the fall of 2022 when projected 2023 allocations are prepared and distributed. A set of explanatory slides and handouts will be prepared for Aging Directors to use in communicating about the changes to their stakeholders, and the BADR Aging Budget and Policy Analyst will provide opportunities for consultation on a regular basis throughout the implementation period.

Updating Wisconsin's Allocation Formulas: Historical Background

In distributing Older Americans Act funds, Wisconsin uses demographic information published by the U.S. Bureau of the Census to align AAA allocations and subsequent county and tribal funding with their share of the state's population in specified target groups. Historically, the Census tables used to create Wisconsin's allocation formulas included the number of people in each AAA and component county who were age 60 and older, the number of those age 75 and older, the number of those age 60 and older whose incomes were below 125% of the poverty threshold, and the number of those age 60 and older who were nonwhite or of Latino/Hispanic ethnicity. In addition, the formulas employed an indicator of counties with "rural" status to help direct funds to areas with low population density.

Also historically, the Census Bureau's release of demographic data was based on two decennial surveys: the 100% population counts mandated by the U.S. Constitution, and the "long form" survey that gathered detailed social and economic information from a sample of the population. One limitation of these decennial data sources was the long-time lag between waves of updated population data. Over each ten-year period, large changes in Census population measures led to large changes in the distribution of Older Americans Act funding to Wisconsin AAAs and subsequently to counties. At the start of each new decade, hold harmless measures would be crafted to help counties transition to their new funding levels.

The last "long form" decennial survey in 2000 was replaced over the next decade by the Census Bureau's American Community Survey (ACS), taken continuously from a sample of the population. Results from the ACS began to be widely published in 2005, and in 2009 the Census Bureau began publishing five-year aggregations of all data tables on an annual basis. Whereas standard Census Bureau tabulations group older adults into a "65 and older" category, in 2010, the Census Bureau began producing Special Tabulations on Aging through a contract with the Administration on Aging, making key tables available for the 60 and older population. This is the group that is eligible for Older Americans Act programming.

For purposes of utilizing county-level population information in funding formulas, five-year aggregations were necessary in all of these Census Bureau products because the ACS's relatively small sample size, compared to the old 10-year Census surveys, meant that the annual data from counties with fewer than 20,000 inhabitants were not reliably representative of the whole population. Only by combining five years of surveys could the ACS estimates meet the Census Bureau's minimum reliability standards. Even with five years of survey data the estimates for many data points, particularly in rural counties, had to be published with wide margins of error.

Changing Data Sources Require Altered Allocation Methods

To illustrate the problem created by widening margins of error in Census Bureau poverty data, consider the American Community Survey's 2009-2013 estimate of the number of individuals age 60 and older in Menominee County, Wisconsin. The ACS for this year estimates that 125 persons age 60 and older had income below 125% of poverty during this interval (this is the measure that was being implemented in allocation formulas at that time). However, that estimate has a margin of error of 48 persons. In other words, the Census Bureau estimates with 90% confidence that the number of people in this group is between 77 and 173. The margin of error in this case is 38% of the estimate itself. This data point is the indicator of "low income" historically used in Wisconsin's Title III allocation formulas.

Similar margins exist for the estimates of many demographic characteristics in small counties, but appear to be largest for measures involving income and poverty. These broad margins of error create significant challenges for describing communities and for planning, but the obstacles they present for distributing funds has proven catastrophic for Wisconsin's historical allocation formulas. First, the breadth of the margins for smaller counties makes pegging funding levels to any number in the estimated range tantamount to a "best guess." Estimates that carry the caveat of "plus or minus" nearly half the value of the estimate will produce, when employed in funding formulas, dollar amounts that are very difficult to justify or defend as appropriate to serve a county's population.

Second, the published estimates of some characteristics (most notably those related to income and poverty) vary tremendously from year to year, rising and falling within their margins of error without apparent pattern and in clear contrast with other, presumably related population characteristics. For example, Barron County's share of the state's 60 and older population declined very slightly and steadily over the four five-year ACS datasets released between 2011 and 2015, but the same county's share of the 60+ population with income below poverty fell between the first two points in time, then rose, then fell again. Because the margins of error around these estimates are so large, it is impossible to know whether the fluctuations in these estimates reflect real change in the population, or simply differences in sampling or measurement error across the four compiled datasets.

Finally, Wisconsin's long-established allocation methodology rested very heavily on a single data factor which shows great variability in the ACS: the percent of the 60+ population with low income (defined in Wisconsin since 2002 as "below 125% of poverty level"). In fact the formulas used to allocate Title III C1 (congregate nutrition) funds and Title III D (health promotion) funds were weighted 90% on this factor. The formulas for other parts of Title III weighted the low-income factor at 45%. This approach, while intended to address the Older Americans Act directive to target services to populations in greatest need, stood in sharp contrast to the allocation approaches used by other states. No other state weights a poverty or low-income measure more heavily than 50% (Texas and Virginia), and most use a weight of between 10% and 20%. In addition to the problems of data reliability, this analysis of Wisconsin's allocation approach raised the possibility that the formulas themselves may create risk of error or distortion because of their heavy reliance on a single factor.

After extensive analysis of these problems, and based on consultations with other Wisconsin agency demographers, the State Data Center, and analysts at the Census Bureau, BADR decided that the ACS estimates of poverty, in particular, are not adequately reliable to utilize so heavily in the allocation of funding. Indeed, Census Bureau analysts pointed out that the ACS estimates are not intended to represent accurate population counts for purposes of funding, and in fact should be used only for descriptive and planning purposes. In addition, those consulted agreed that the formulas themselves should be examined and possibly revised with a more balanced approach to factor weighting.

Allocation Review and Revision: A State Workgroup

To address these problems with the state's approach to formula funding, BADR invited stakeholders from county and tribal aging units and Area Agencies on Aging to participate in a workgroup charged with proposing and evaluating strategies to address both the data reliability problem and the weighting issue. The goal of this workgroup was to arrive at a proposed approach acceptable to stakeholders, namely to AAAs and counties whose funding would be altered by the modified allocation methodology. After explanatory presentations at the regional Program and Service Area meetings and an emailed solicitation to all AAA and county and tribal aging directors, BADR convened a series of four in-person meetings with about 20 workgroup members including representatives from each of Wisconsin's three Area Agencies on Aging.

The Statewide Allocation Workgroup was charged with accomplishing three things:

- Find a method of targeting program funds that reduces or eliminates the use of ACS low-income measures as a formula factor.
- Restructure the weighting of Title III formula factors to reduce dependence on any single population-based factor, and also to accomplish greater consistency across programs and greater parity with other states' approaches.
- Create a strategy to minimize abrupt changes in county funding levels due to formula changes.

Deciding on Population-Based Factors

The statewide allocation workgroup examined the benefits and challenges of using a variety of factors and weighting schemes to drive the allocation process. In general terms, the group agreed that every formula should direct some share of the funds based on the population age 60 and older, the threshold for program eligibility for all Title III programs. The group also agreed that the designation of a county as rural should carry some weight in each formula, as should the county's share of the state's racial and ethnic minority population. Finally, even given problems with currently available data to indicate the low-income status of county populations, the group felt that the Older Americans Act intent to target services to people with low income required the continued use of a poverty factor, but at a significantly reduced weight.

The BADR analytic team investigated alternatives to using ACS data to estimate the low-income county population, but determined that there exists no more reliable source of income data for the population age 60+, at the county level, for every county, on an annually-updated basis. Other small-area poverty estimates lack specificity for the older population, while other sources with detailed age data lack geographic specificity. All other sources (e.g., for "all ages") at the county level have error margins large enough to present challenges similar to those in the ACS. Even with its limitations, the ACS remains the best available alternative for estimating this aspect of "greatest need" at the county level. When presented with these considerations, the statewide workgroup made the decision to retain this data source but with substantially decreased weight in the funding formulas.

In addition, the workgroup introduced two new factors to be implemented for specific programs. The group focused first on the formula for Title III C1, Congregate Meals, which allocates the largest share of aging funds in Wisconsin and which has depended most heavily on the ACS low-income data (weighted at 90%). One Wisconsin AAA (Dane County Area Agency on Aging) had recently undergone an evaluation of its own methodology for allocating Title III C1 funds to focal points, and presented findings demonstrating the effectiveness of a factor previously unused in the state formulas: the share of the 60+ population living alone. The workgroup directed the SUA to investigate the validity and reliability of this measure in the ACS data, and analysis showed that it significantly improved upon the previous "low income" factor, showing smaller margins of error and less variability than the low-income estimates. The group decided to adopt this measure for the Title III C1 and C2 formulas.

The second new factor emerged from discussion of the formula to allocate Title III E "National Family Caregiver Support Program" funds. The workgroup agreed that no reliable and relevant performance measure was available for the remaining program allocation formulas, and that for caregiver support programming, "people age 60+ living alone" was not an appropriate factor since family caregivers who live with the people they care for require a particularly high level of support. Instead, the group directed the SUA to investigate a new factor indicating when a large share of a county's households included a member age 60+. Households in this group are more likely to require caregiving and caregiver support, regardless of whether the older adult lives alone or with others. After analysis and discussion, the group decided to adopt this measure as well. The factor created from this concept assigns "Aged County" status to all counties in which a higher-than-average (median) percent of households have a member age 60 or older based on the American Community Survey's five-year compilation.

The "aged county" factor is constructed and operates using the same logic that underlies the "Rural County" factor: each county is designated as either receiving this allocation or not, depending on their factor status (we refer to this in Table 5, below, as a "two-tier factor). "Rural Counties" are those with a population density of fewer than 20 persons aged 60 and older per square mile. It is a county-level determination, and is based on the entire county's population density rather than on the complex and fluid concept of a balance of urbanized and rural areas or status as a Standard Metropolitan Statistical Area. For the sample allocations illustrated in this proposal, 45 of 72 counties are considered "rural" and receive the rural allocation; 36 of 72 counties are considered "aged counties" and receive a fixed dollar amount on this basis.

One additional benefit of the new group of proposed formula factors is that most are available on a regular basis from sources with greater reliability than the American Community Survey. The number of people age 60+, and the number age 60+ who report racial and ethnic minority status, are produced annually for all counties by the U.S. Bureau of the Census Population Estimates Program, which has a very strong record of tracking close to actual population dynamics as documented by the decennial U.S. Census. The formulas can be updated annually from this source, bypassing the ACS entirely. Because the Population Estimates Program does not tabulate household composition, the ACS will be the source of annual estimates for "persons age

60+ living alone" and "households with a member age 60+," as well as the low-income factor. The decennial Census will be analyzed every ten years to assess the accuracy of ACS estimates.

To summarize, the following assumptions underlie the selection of factors used in the revised intrastate allocation formulas:

✓ **Age 60+ with Income Below Poverty -** Older people with incomes at or below the poverty level have difficulty meeting the usual costs of daily life and the high, unpredictable costs of health care and are more dependent on public services and benefits.

✓ **Age 60 and Older -** People who are age 60 and older are eligible for services under the Older Americans Act because, with advancing age, they are increasingly likely to experience functional disabilities and require a variety of health and support services.

✓ **Non-White Race or Hispanic/Latino Ethnicity** – Older adults from communities of color have disproportionately experienced social, economic, educational and health disparities that limit their opportunities and threaten their ability to remain independent. The incidence of poverty is more prevalent among older adults from these groups, as are the incidence of numerous chronic health problems and disabling conditions.

✓ **Rural Status -** Older adults who live in rural areas are often isolated from family, friends, community activities, and formal support services. Program and service offerings in rural areas are often limited by lengthy travel distances and an absence of alternative transportation, minimal county funds, and workforce and volunteer shortages.

✓ **Age 60 and Living Alone –** Individuals living alone are more likely to require structured social interaction (either through congregate meal participation or through personal contact with home-delivered meal volunteers), and are at elevated nutritional risk with advancing age as the incidence of mobility limitations and functional disability rises.

✓ **Percent of County Households with a Member Age 60+ -** Households in this group are more likely to require caregiving and caregiver support, regardless of whether the older adult lives alone or with others.

Deciding on Factor Weights

The second phase of the allocation update project involved determining factor weights, beginning with establishing new weights for the low-income factor which had previously driven 90% of the funding for Title IIIC1 and Title IIID. The workgroup directed BADR to create and test a number of weighting scenarios in an effort to minimize funding changes for counties when the new factors are implemented. Each proposed scenario was to avoid domination by any single factor, and to the extent possible, the weighting of the factors was to be similar across the five Title III formulas.

To meet these goals required changes to all formulas, but most substantially to the Title III C1 and D formulas, in which "low income" had been weighted at 90%. The BADR analytic team focused its efforts primarily on the C1 formula, developing more than a dozen weighting scenarios and comparing their results across individual counties, groups of similar counties, and the state as a whole.

The scenario ultimately selected accomplishes the goals with the least disruption to previous AAA distributions of funds to counties and tribes. It brings balance to this program's funding by diversifying and reducing the volatility of its population data. It maintains a reasonable role for the low-income factor, while improving the overall fit of the formulas to the intent of the Older Americans Act by bolstering the role of the minority 60+ population factor in directing funds to serve those most in need. It expands the definition of need to include those living alone, weighted slightly more strongly for the home-delivered meal program. It incorporates a new way of directing caregiver support funds to geographic areas with the highest concentrations of older adults.

Table 5. Proposed Factors, Intrastate Funding Formula Amendment

	TITLE III B	TITLE III C-1	TITLE III C-2	TITLE III D	TITLE III- E
Rural County Allocation (2 tiers)	10%	10%	10%	10%	10%
60+ Population	45%	45%	35%	45%	45%
60+ Minority	15%	15%	15%	15%	15%
60+ Below 100% Poverty	20%	20%	20%	20%	20%
Aged County Allocation (2 tiers)					10%
60+ Living Alone	10%	10%	20%	10%	
	100%	**100%**	**100%**	**100%**	**100%**

Note: See text on page 17, above, for an explanation of the "2 tier" factors (Rural County Allocation and Aged County Allocation).

Additional Measures to Minimize Impact on AAA Distributions to Counties

Wisconsin's counties vary tremendously in size, and any funding formula that allocates funds to AAAs based on its component counties' share of total population in specified groups puts very small counties at risk of insufficient funding. Historically, Wisconsin's funding formulas have incorporated both funding bases and minimums to ensure that the AAA distributions to the smallest counties are allocated adequate funds to "keep the lights on" to operate aging programs, despite their very small shares of state population. While historical allocations often started by setting aside a portion of the total funds available to cover a base funding level for every county, the updated approach eliminates base funding levels in favor of minimum funding levels. The reason for this change is the fact that a base-driven approach reduces dollar amount available for distribution based on population characteristics, undermining the formulas' effectiveness at targeting funds to areas in greatest need. In contrast, setting minimum funding levels allows population factors to drive the distribution of all available funds except in the small number of counties whose resulting distributions fall below the established threshold. In these instances, the allocation formula withdraws the funds needed to bring every county up to the minimum funding level and then recalculates all of the allocations to distribute the funds remaining. When minimums are used instead of bases, the targeting intent of the formula is given more opportunity to succeed in putting funds where they are most needed.

To accomplish this, the new approach establishes funding minimums for each part of Title III, with a goal of supporting basic program operations in every county while maintaining the largest share of funds for distribution by formula to address the intent of the Older Americans Act. A second aspect of minimizing disruption to county aging unit funding when the new formula factors and weights are introduced involves the application of “hold harmless” provisions in every formula. These will ensure that no county’s distribution in any portion of Title III decreases by more than five percent of its 2022 distribution in 2023. In addition, the approach applies a “maximum gain” provision to ensure that no county’s distribution increases by more than 10 percent in 2023. These provisions will restrain annual losses and gains for two additional years: 2024 and 2025. After 2025, all remaining decreases will be smaller than five percent and all counties will have been transitioned to their formula-driven distribution amounts.

Input from stakeholders was crucial to formulating this approach, and extended meeting time was dedicated to ensuring that concerns about altered funding levels were thoroughly discussed. Workgroup members agreed that the altered approach would be beneficial for improving consistency over time and for ensuring equitable distribution of funds. In addition, the proposed changes would help stabilize remote rural counties with very small populations by bringing a stronger set of funding minimums to bear, and by increasing the funds available for distribution to counties designated as rural. Members pointed out that a long history of stagnant federal and state funding levels had required counties to contribute steadily increasing levy amounts to maintain service levels, such that state and federal funds made up a shrinking share of total program funds in many areas. The level of decreased funding anticipated was not viewed as a major problem by the group, and those in counties projected to experience decreases felt that implementing them quickly (over three years at most) would be preferable to an extended period of smaller reductions. Somewhat surprisingly, members from counties anticipated to gain funds expressed concern that small *gains*, insufficient to support significant staffing or service enhancements, could create challenges of their own. They, too, expressed a preference to implement quickly and move on. In sum, the workgroup concluded that the measures in place to minimize impact were adequate and equitable.

The referenced protective elements are summarized in **Table 6**.

Table 6. Elements to Minimize Impact, Intrastate Funding Formula

	TITLE III B	TITLE III C-1	TITLE III C-2	TITLE III D	TITLE III- E
Minimum Allocation	$20,000	$50,000	$10,000	$2,000	$10,000
Hold Harmless	**95%**	**95%**	**95%**	**95%**	**95%**
Maximum Hold	**110%**	**110%**	**110%**	**110%**	**110%**

A Note on Public Input into Formula Revisions and Review of Results:

The Allocation Workgroup included representatives from each of Wisconsin’s three Area Agencies on Aging. In addition, the BADR analytic team presented a detailed explanation of the problem, the workgroup’s efforts, and the proposed allocation methodology to the leadership of each AAA individually. The team also presented the methodology and discussed projected outcomes with the Milwaukee County Commission on Aging. Extended presentations and input sessions were provided to the State Aging Advisory Council, and the quarterly Program and Service Area meetings of County and Tribal Aging Unit directors.

Once the proposed approach has been approved by ACL, the formulas and their financial consequences will be presented and explained in detail once again at Aging PSA meetings, ADRC Directors' meetings, Area Agency on Aging Board and Advisory Council meetings, and the Aging and Disability Professionals Association of Wisconsin annual meeting (attended by directors of County and Tribal Aging Units and Aging and Disability Resource Centers). This process is anticipated to take place in September and October, 2022. A set of explanatory slides and handouts will be prepared for Aging Directors to use in communicating about the changes to their stakeholders, and the BADR Aging Budget and Policy Analyst will collect public input and provide opportunities for consultation on a regular basis throughout the implementation period.

Applying the Intrastate Funding Formula: Results for AAAs and Aging Units

After the above administrative allocations, projected AAA allocations and the designation of amounts for distribution to counties are prepared according to the formulas detailed above. The results of this process are illustrated below in **Table 7,** which shows the amounts that have been distributed to counties as preliminary awards in 2022 (using the amounts allocated in 2021 pending final adjustments to the state's 2022 awards by ACL); and in **Table 8**, which shows the allocations generated by using the new formulas to distribute those same 2021 amounts. These examples assume that Wisconsin's federal Title III allocations will be held constant at 2021 levels; actual funding will depend on final allocations to Wisconsin by the Administration for Community Living. An analysis of the new formulas' impact on county funding levels follows as Table 9, comparing the totals distributed by the historic formulas and the new formulas.

Table 7. Preliminary 2022 Allocations Using Prior Formula

COUNTY	III-B	III-C-1	III-C-2	III-D	III-E	TOTAL
Adams	$36,171	$85,463	$25,420	$2,802	$15,457	$165,313
Ashland	$26,474	$77,615	$16,670	$2,545	$10,137	$133,441
Barron	$57,324	$191,233	$44,506	$6,270	$27,063	$326,396
Bayfield	$27,985	$67,030	$18,032	$2,197	$10,965	$126,209
Brown	$203,112	$471,672	$176,056	$15,468	$107,055	$973,363
Buffalo	$23,805	$70,591	$14,261	$2,314	$8,671	$119,642
Burnett	$28,839	$95,535	$18,803	$3,132	$11,434	$157,743
Calumet	$42,411	$54,084	$31,049	$1,774	$18,880	$148,198
Chippewa	$72,359	$169,232	$58,072	$5,549	$35,312	$340,524
Clark	$37,918	$139,133	$26,997	$4,562	$16,415	$225,025
Columbia	$55,086	$148,621	$42,488	$4,873	$25,835	$276,903
Crawford	$28,707	$77,866	$18,685	$2,553	$11,361	$139,172
Dane	$343,277	$561,327	$302,533	$18,409	$183,960	$1,409,506
Dodge	$79,362	$173,359	$64,392	$5,685	$39,155	$361,953
Door	$42,569	$66,340	$31,193	$2,175	$18,967	$161,244
Douglas	$52,624	$133,358	$40,266	$4,373	$24,483	$255,104
Dunn	$43,413	$91,734	$31,956	$3,007	$19,432	$189,542
Eau Claire	$87,112	$165,663	$71,385	$5,433	$43,406	$372,999
Florence	$14,482	$39,342	$6,000	$1,289	$5,000	$66,113
Fond du Lac	$101,597	$213,787	$84,456	$7,012	$51,355	$458,207
Forest	$18,578	$63,118	$9,545	$2,069	$5,803	$99,113
Grant	$56,746	$167,311	$43,987	$5,486	$26,746	$300,276
Green	$40,475	$107,504	$29,303	$3,525	$17,819	$198,626
Green Lake	$29,164	$74,328	$19,097	$2,436	$11,613	$136,638
Iowa	$30,194	$77,989	$20,026	$2,557	$12,177	$142,943
Iron	$16,633	$45,911	$7,790	$1,504	$5,000	$76,838
Jackson	$28,977	$80,196	$18,930	$2,629	$11,511	$142,243
Jefferson	$81,378	$160,491	$66,211	$5,264	$40,261	$353,605
Juneau	$37,055	$102,022	$26,220	$3,344	$15,942	$184,583
Kenosha	$133,426	$396,497	$113,176	$13,003	$68,818	$724,920
Kewaunee	$29,533	$71,338	$19,429	$2,339	$11,815	$134,454
LaCrosse	$97,715	$237,416	$80,953	$7,786	$49,224	$473,094
Lafayette	$25,613	$58,622	$15,894	$1,921	$9,665	$111,715
Langlade	$31,483	$88,219	$21,189	$2,892	$12,885	$156,668
Lincoln	$39,621	$112,900	$28,533	$3,701	$17,350	$202,105
Manitowoc	$88,749	$236,359	$72,862	$7,752	$44,304	$450,026
Marathon	$122,690	$306,974	$103,489	$10,067	$62,928	$606,148

Table 7, continued. Preliminary 2022 Allocations Using Prior Formula						
COUNTY	III-B	III-C-1	III-C-2	III-D	III-E	TOTAL
Marinette	$56,486	$183,029	$43,750	$6,002	$26,603	$315,870
Marquette	$28,721	$66,633	$18,697	$2,184	$11,369	$127,604
Menominee*	$13,903	$27,588	$6,000	$903	$5,000	$53,394
Milwaukee	$923,714	$2,669,472	$826,274	$87,551	$502,436	$5,009,447
Monroe	$47,232	$104,439	$35,401	$3,424	$21,525	$212,021
Oconto	$43,661	$135,402	$32,179	$4,440	$19,566	$235,248
Oneida	$49,785	$143,716	$37,704	$4,712	$22,925	$258,842
Outagamie	$137,012	$291,325	$116,412	$9,554	$70,787	$625,090
Ozaukee	$82,413	$111,993	$67,146	$3,673	$40,829	$306,054
Pepin	$16,784	$75,529	$7,925	$1,091	$5,000	$106,329
Pierce	$33,038	$71,362	$22,594	$2,339	$13,738	$143,071
Polk	$51,381	$127,958	$39,143	$4,196	$23,801	$246,479
Portage	$67,116	$152,118	$53,343	$4,988	$32,437	$310,002
Price	$26,062	$66,411	$16,297	$2,177	$9,911	$120,858
Racine	$181,409	$487,387	$156,473	$15,984	$95,146	$936,399
Richland	$28,278	$72,337	$18,296	$2,372	$11,126	$132,409
Rock	$145,669	$293,082	$124,223	$9,611	$75,535	$648,120
Rusk	$25,836	$84,441	$16,095	$2,768	$9,786	$138,926
Saint Croix	$66,340	$117,371	$52,642	$3,850	$32,010	$272,213
Sauk	$61,987	$158,611	$48,714	$5,201	$29,621	$304,134
Sawyer	$30,789	$84,539	$20,564	$2,771	$12,503	$151,166
Shawano	$50,211	$154,547	$38,088	$5,068	$23,160	$271,074
Sheboygan	$102,229	$193,748	$85,026	$6,354	$51,701	$439,058
Taylor	$30,349	$93,403	$20,166	$3,062	$12,263	$159,243
Trempealeau	$34,616	$105,227	$24,016	$3,450	$14,604	$181,913
Vernon	$44,371	$121,774	$32,819	$3,993	$19,957	$222,914
Vilas	$39,433	$89,999	$28,364	$2,950	$17,247	$177,993
Walworth	$92,616	$184,662	$76,352	$6,056	$46,426	$406,112
Washburn	$29,904	$66,767	$19,764	$2,188	$12,018	$130,641
Washington	$113,082	$187,518	$94,819	$6,149	$57,656	$459,224
Waukesha	$332,653	$484,124	$292,947	$15,877	$178,130	$1,303,731
Waupaca	$58,476	$166,003	$45,547	$5,443	$27,696	$303,165
Waushara	$37,905	$102,430	$26,985	$3,358	$16,408	$187,086
Winnebago	$138,217	$341,533	$117,499	$11,201	$71,447	$679,897
Wood	$85,714	$181,662	$70,125	$5,958	$42,640	$386,099
Totals*	$5,620,049	$13,478,320	$4,552,243	$440,595	$2,771,211	$26,862,418

* NOTE that Menominee totals here are the amounts allocated to Menominee as a TRIBE, not including the amount later added from the Tribal set-aside. Also, the TOTALS here differ from COUNTY totals shown in other allocation tables because HERE they include Menominee's county allocation.

Table 8. Projected 2022 Allocations Using Revised Formulas						
COUNTY	III-B	III-C-1	III-C-2	III-D	III-E	TOTAL
Adams	$36,954	$92,166	$27,962	$2,985	$17,003	$177,069
Ashland	$29,121	$75,555	$18,337	$2,447	$11,151	$136,611
Barron	$54,458	$181,671	$43,127	$5,957	$29,769	$314,982
Bayfield	$30,524	$73,733	$19,835	$2,417	$12,062	$138,571
Brown	$192,956	$463,220	$167,253	$15,000	$101,702	$940,132
Buffalo	$24,159	$67,061	$15,687	$2,198	$10,000	$119,106
Burnett	$31,294	$90,758	$20,683	$2,975	$12,577	$158,288
Calumet	$40,290	$59,492	$29,497	$2,000	$17,936	$149,215
Chippewa	$68,741	$160,770	$55,168	$5,272	$33,546	$323,498
Clark	$36,703	$132,176	$29,697	$4,334	$17,767	$220,677
Columbia	$55,347	$141,190	$44,933	$4,629	$26,297	$272,397
Crawford	$29,073	$73,973	$20,554	$2,425	$12,497	$138,522
Dane	$353,399	$617,460	$287,406	$20,250	$174,762	$1,453,277
Dodge	$75,394	$164,691	$61,172	$5,401	$37,197	$343,855
Door	$40,441	$72,974	$29,633	$2,393	$20,864	$166,304
Douglas	$50,908	$126,969	$41,807	$4,154	$24,245	$248,083
Dunn	$43,163	$100,907	$35,135	$3,308	$20,757	$203,270
Eau Claire	$82,756	$176,101	$67,816	$5,702	$41,236	$373,611
Florence	$20,000	$50,000	$10,000	$2,000	$10,000	$92,000
Fond du Lac	$96,517	$203,098	$80,233	$6,661	$48,787	$435,297
Forest	$20,436	$59,962	$10,500	$2,000	$10,000	$102,897
Grant	$53,909	$158,945	$42,817	$5,212	$25,409	$286,291
Green	$42,190	$105,226	$32,233	$3,407	$19,601	$202,658
Green Lake	$30,168	$75,241	$21,007	$2,436	$12,774	$141,627
Iowa	$31,485	$78,526	$22,029	$2,543	$13,395	$147,977
Iron	$20,000	$50,000	$10,000	$2,000	$10,000	$92,000
Jackson	$31,203	$77,824	$20,823	$2,520	$12,662	$145,033
Jefferson	$77,309	$168,079	$62,900	$5,443	$38,248	$351,979
Juneau	$38,391	$96,921	$28,842	$3,177	$17,536	$184,867
Kenosha	$129,272	$376,672	$107,517	$12,353	$65,377	$691,192
Kewaunee	$29,310	$73,102	$21,372	$2,367	$12,997	$139,148
LaCrosse	$92,829	$225,545	$76,905	$7,397	$46,763	$449,439
Lafayette	$26,441	$64,484	$17,483	$2,113	$10,632	$121,153
Langlade	$32,716	$83,808	$23,308	$2,747	$14,174	$156,753
Lincoln	$39,176	$107,255	$31,386	$3,516	$19,085	$200,418
Manitowoc	$84,312	$224,541	$69,219	$7,364	$42,089	$427,525
Marathon	$116,556	$291,625	$98,315	$9,564	$59,782	$575,841

Table 8, continued. Projected 2022 Allocations Using Revised Formula

COUNTY	III-B	III-C-1	III-C-2	III-D	III-E	TOTAL
Marinette	$53,662	$173,878	$42,545	$5,702	$29,263	$305,049
Marquette	$28,806	$71,844	$20,567	$2,326	$12,506	$136,048
Menominee*	$20,000	$50,000	$10,000	$2,000	$10,000	$92,000
Milwaukee	$1,016,085	$2,610,528	$871,148	$84,534	$502,343	$5,084,639
Monroe	$46,853	$114,883	$38,439	$3,766	$22,260	$226,201
Oconto	$44,113	$128,632	$35,397	$4,218	$21,523	$233,882
Oneida	$48,608	$136,530	$39,115	$4,476	$25,218	$253,947
Outagamie	$130,161	$306,089	$110,591	$9,912	$67,248	$624,001
Ozaukee	$78,292	$123,192	$63,789	$4,040	$40,577	$309,891
Pepin	$20,000	$75,529	$10,000	$2,000	$10,000	$117,529
Pierce	$36,060	$78,498	$24,853	$2,573	$15,112	$157,096
Polk	$50,464	$125,861	$40,786	$4,076	$26,181	$247,367
Portage	$63,760	$144,512	$50,676	$4,739	$30,815	$294,502
Price	$26,907	$67,108	$17,927	$2,173	$10,902	$125,016
Racine	$175,761	$463,018	$148,649	$15,185	$90,389	$893,001
Richland	$29,761	$74,226	$20,126	$2,404	$12,239	$138,755
Rock	$138,386	$322,390	$118,012	$10,572	$71,758	$661,118
Rusk	$26,848	$80,219	$17,705	$2,630	$10,765	$138,166
Saint Croix	$63,023	$129,108	$50,010	$4,235	$30,410	$276,786
Sauk	$58,888	$150,680	$46,278	$4,941	$28,140	$288,927
Sawyer	$33,786	$84,265	$22,620	$2,729	$13,753	$157,153
Shawano	$51,610	$146,820	$41,897	$4,815	$25,476	$270,618
Sheboygan	$97,118	$213,123	$80,775	$6,989	$49,116	$447,120
Taylor	$30,881	$88,733	$22,183	$2,909	$13,489	$158,194
Trempealeau	$34,126	$99,966	$26,418	$3,278	$16,064	$179,851
Vernon	$42,152	$115,685	$34,099	$3,793	$21,953	$217,683
Vilas	$40,117	$98,999	$31,200	$3,240	$18,972	$192,528
Walworth	$87,985	$196,937	$72,534	$6,377	$44,105	$407,939
Washburn	$30,387	$73,444	$21,740	$2,407	$13,220	$141,198
Washington	$107,428	$206,270	$90,078	$6,764	$54,773	$465,313
Waukesha	$316,020	$532,536	$278,300	$17,465	$169,224	$1,313,545
Waupaca	$55,552	$157,703	$43,270	$5,171	$26,311	$288,007
Waushara	$36,860	$97,309	$29,684	$3,190	$18,049	$185,091
Winnebago	$131,306	$324,456	$111,624	$10,641	$67,875	$645,902
Wood	$81,428	$172,579	$66,619	$5,660	$40,508	$366,794
Totals*	$5,621,096	$13,477,273	$4,552,243	$440,595	$2,771,211	$26,862,418

* NOTE that Menominee totals here are the amounts allocated to Menominee as a TRIBE, not including the amount later added from the Tribal set-aside. Also, the TOTALS here differ from COUNTY totals shown in other allocation tables because HERE they include Menominee's county allocation.

Table 9. Comparing Preliminary 2022 to Projected "New Formula" Totals				
COUNTY	2022 Preliminary (Original Formula)	2023 Projections (Revised Formula)	Difference	Percent Change
Adams	$165,313	$177,069	$11,756	7.1%
Ashland	$133,441	$136,611	$3,170	2.4%
Barron	$326,396	$314,982	($11,414)	-3.5%
Bayfield	$126,209	$138,571	$12,362	9.8%
Brown	$973,363	$940,132	($33,231)	-3.4%
Buffalo	$119,642	$119,106	($536)	-0.4%
Burnett	$157,743	$158,288	$545	0.3%
Calumet	$148,198	$149,215	$1,017	0.7%
Chippewa	$340,524	$323,498	($17,026)	-5.0%
Clark	$225,025	$220,677	($4,348)	-1.9%
Columbia	$276,903	$272,397	($4,506)	-1.6%
Crawford	$139,172	$138,522	($650)	-0.5%
Dane	$1,409,506	$1,453,277	$43,771	3.1%
Dodge	$361,953	$343,855	($18,098)	-5.0%
Door	$161,244	$166,304	$5,060	3.1%
Douglas	$255,104	$248,083	($7,021)	-2.8%
Dunn	$189,542	$203,270	$13,728	7.2%
Eau Claire	$372,999	$373,611	$612	0.2%
Florence	$66,113	$92,000	$25,887	39.2%
Fond du Lac	$458,207	$435,297	($22,910)	-5.0%
Forest	$99,113	$102,897	$3,784	3.8%
Grant	$300,276	$286,291	($13,985)	-4.7%
Green	$198,626	$202,658	$4,032	2.0%
Green Lake	$136,638	$141,627	$4,989	3.7%
Iowa	$142,943	$147,977	$5,034	3.5%
Iron	$76,838	$92,000	$15,162	19.7%
Jackson	$142,243	$145,033	$2,790	2.0%
Jefferson	$353,605	$351,979	($1,626)	-0.5%
Juneau	$184,583	$184,867	$284	0.2%
Kenosha	$724,920	$691,192	($33,728)	-4.7%
Kewaunee	$134,454	$139,148	$4,694	3.5%
LaCrosse	$473,094	$449,439	($23,655)	-5.0%
Lafayette	$111,715	$121,153	$9,438	8.4%
Langlade	$156,668	$156,753	$85	0.1%
Lincoln	$202,105	$200,418	($1,687)	-0.8%
Manitowoc	$450,026	$427,525	($22,501)	-5.0%
Marathon	$606,148	$575,841	($30,307)	-5.0%

Table 9, continued: Comparing Preliminary 2022 to Projected 2023 Totals				
COUNTY	2022 Preliminary (Original Formula)	2023 Projections (Revised Formula)	Difference	Percent Change
Marinette	$315,870	$305,049	($10,821)	-3.4%
Marquette	$127,604	$136,048	$8,444	6.6%
Menominee	$53,394	$92,000	$38,606	72.3%
Milwaukee	$5,009,447	$5,084,639	$75,192	1.5%
Monroe	$212,021	$226,201	$14,180	6.7%
Oconto	$235,248	$233,882	($1,366)	-0.6%
Oneida	$258,842	$253,947	($4,895)	-1.9%
Outagamie	$625,090	$624,001	($1,089)	-0.2%
Ozaukee	$306,054	$309,891	$3,837	1.3%
Pepin	$106,329	$117,529	$11,200	10.5%
Pierce	$143,071	$157,096	$14,025	9.8%
Polk	$246,479	$247,367	$888	0.4%
Portage	$310,002	$294,502	($15,500)	-5.0%
Price	$120,858	$125,016	$4,158	3.4%
Racine	$936,399	$893,001	($43,398)	-4.6%
Richland	$132,409	$138,755	$6,346	4.8%
Rock	$648,120	$661,118	$12,998	2.0%
Rusk	$138,926	$138,166	($760)	-0.5%
Saint Croix	$272,213	$276,786	$4,573	1.7%
Sauk	$304,134	$288,927	($15,207)	-5.0%
Sawyer	$151,166	$157,153	$5,987	4.0%
Shawano	$271,074	$270,618	($456)	-0.2%
Sheboygan	$439,058	$447,120	$8,062	1.8%
Taylor	$159,243	$158,194	($1,049)	-0.7%
Trempealeau	$181,913	$179,851	($2,062)	-1.1%
Vernon	$222,914	$217,683	($5,231)	-2.3%
Vilas	$177,993	$192,528	$14,535	8.2%
Walworth	$406,112	$407,939	$1,827	0.4%
Washburn	$130,641	$141,198	$10,557	8.1%
Washington	$459,224	$465,313	$6,089	1.3%
Waukesha	$1,303,731	$1,313,545	$9,814	0.8%
Waupaca	$303,165	$288,007	($15,158)	-5.0%
Waushara	$187,086	$185,091	($1,995)	-1.1%
Winnebago	$679,897	$645,902	($33,995)	-5.0%
Wood	$386,099	$366,794	($19,305)	-5.0%

Part 3: Financial Plan Assurances

The Older Americans Act as reauthorized in 2015 stipulates that all State Plans must address specific assurances related to targeting of Older Americans Act funds and activities of the aging network.

Assurances related to Title III B expenditures

Section 307(a)(2) requires assurance that a minimum proportion of the funds received by each AAA in the State to carry out Title III B will be expended through contracts for direct services (in the absence of a waiver under section 306(c) or 316 allowing an AAA to provide services specified in section 306(a)(2)). The Wisconsin Bureau of Aging and Disability Resources has specified the following minimum percentages of Title III-B funds or an equivalent amount of non-federal funding which must be expended by each AAA for the duration of this plan.

Service Category	**Minimum Required Percent of Title IIIB Funds Which Must be Spent on this Service**
Services Associated With Access to Services (transportation, outreach, information and assistance and case management services).	A minimum of six percent per AAA must be spent for this category of services
In-Home Services (homemaker and home health aide, visiting and telephone reassurance, chore maintenance, and supportive services for families of older individuals who are victims of Alzheimer's disease and related disorders with neurological and organic brain dysfunction).	A minimum of seven percent per AAA must be spent for this category of services
Legal and Benefit Assistance (legal services and benefit counseling)	A minimum of five percent per AAA must be spent for this category of services

Assurances related to the targeting of services to those in greatest need

Section 305(a)(2)(E) requires assurance that preference will be given to providing services to older individuals with greatest economic need and older individuals with greatest social need (with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas) and include proposed methods of carrying out the preference in the State plan.

Program funds are targeted to individuals in these groups by designating funds for counties based on the share of each targeted population group residing in each county. Similar to the approach used historically, proposed Phase 2 allocation formula factors employed for the distribution of each part of Title III funds include the share of the 60 and older population, the share of the 60+ population that is non-white and non-Hispanic, the share of the 60+ population with income below poverty level, and the share of the older population living alone.

Section 307(a)(10) requires assurance that the special needs of older individuals residing in rural areas will be taken into consideration and the plan shall describe how those needs have been met and how funds have been allocated to meet those needs.

Program funds are targeted to the special needs of older individuals residing in rural areas by including a minimum level of funding in each population-based formula for allocating Title III funds to AAAs for distribution to counties to ensure that sparsely populated rural counties have adequate funds for basic program operation. Minimum levels are detailed in Table 6, above. Minimum funding levels are also specified in allocating state general purpose revenue to related programs, including the Elder Benefit Specialist Program and the Alzheimer's Family Caregiver Support Program.

In addition, each allocation formula for distributing Title III funds includes a "rural" factor that designates 10% of funds to counties with fewer than 20 persons age 60 and older per square mile. The following counties are designated "rural" in these allocations:

Table 10. Counties Designated as Rural

County	Persons Age 60+ Per Square Mile	County	Persons Age 60+ Per Square Mile
Adams	13.1	Langlade	7.5
Ashland	4.2	Lincoln	10.1
Barron	16.1	Marinette	9.8
Bayfield	4.1	Marquette	12.1
Buffalo	6.1	Menominee	2.5
Burnett	7.7	Monroe	12.8
Chippewa	16.8	Oconto	11.7
Clark	6.9	Oneida	12.0
Columbia	19.9	Pepin	9.9
Crawford	9.1	Pierce	16.9
Douglas	9.3	Polk	14.6
Dunn	12.1	Price	4.0
Florence	3.6	Richland	9.6
Forest	2.9	Rusk	5.3
Grant	11.1	Sawyer	5.0
Green	17.5	Shawano	13.6
Green Lake	17.0	Taylor	6.0
Iowa	8.7	Trempealeau	10.4
Iron	3.2	Vernon	11.1
Jackson	5.7	Vilas	10.9
Juneau	10.3	Washburn	7.4
Kewaunee	17.4	Waushara	13.5
Lafayette	7.3		

Allocation procedures ensure that all AAAs have adequate capacity to serve sparsely populated counties and tribes by including in the formula for distributing administrative funds a factor specifying the number of aging units served.

In addition to the targeting provisions embedded in the allocation formulas, a number of policies and procedures contribute to the overall effort to ensure that programs and services are oriented toward older individuals with the greatest need. These include the following:

1. Provide focused training through regional AAA/PSA meetings and statewide trainings, association meetings and conferences on best practices for the provision of services for targeted populations and in rural areas.

2. Provide training on inclusiveness, cultural competency, and the particular needs of targeted population at regional AAA/PSA meetings and statewide trainings, association meetings and conferences.

3. Provide individual and group training on information and assistance, with particular focus on the serving targeted population and maximizing the capacity of small aging units.

4. Provide training on the use of demographic information for program planning and budgeting.

5. Utilize capacity of the reporting system for OAA services to track program participation and utilization in rural area services.

6. Require that AAAs monitor and provide technical assistance to aging units and service providers who do not serve minority elders at a level equal to target goals.

7. Encourage AAAs to enhance technical assistance to rural aging units.

8. Monitor and encourage county aging units to collaborate with tribal aging units to ensure adequate and appropriate outreach and services for Native American older adults.

9. Encourage coordination with programs serving refugees and migrants.

10. Monitor and encourage the use of vendors with demonstrated capacity and cultural competence for serving diverse populations through the nutrition program.

Assurances related to the funding of programs in rural areas

Section 307(a)(3) (B) with respect to services for older individuals residing in rural areas—
(i) provide assurances that the State agency will spend for each fiscal year, not less than the amount expended for such services for fiscal year 2000; (ii) identify, for each fiscal year to which the plan applies, the projected costs of providing such services (including the cost of providing access to such services); and (iii) describe the methods used to meet the needs for such services in the fiscal year preceding the first year to which such plan applies.

Wisconsin's approach to ensuring that rural counties are held harmless with reference to 2000 funding levels has historically included factors in the Title IIIC1 and Title IIID formulas to distribute five percent of the funds for each program to counties designated as "rural because they either are not part of a federally-designated Metropolitan Statistical Area or are part of an MSA, but have fewer than twenty people 60 years of age or older per square mile." (Source: Intrastate Funding Formula and Financial Plan for 2016-2018, attached here as Appendix C2). The proposed allocation formula revision to be implemented for 2020 expands this approach to distribute *ten* percent of funds across *all* programs under Title III, increasing the total dollar amount available to serve rural populations. Demographic changes long underway in Wisconsin, as elsewhere, result in urbanization continuing to shrink the number of counties designated as rural. After the 2020 Census, it is anticipated that the number of counties eligible to receive funding due to "rural" designation will again decrease, so that the available funds will be divided among a smaller number of units, further helping to support those counties' ability to serve their aging rural populations.

Assurances related to the coordination of Title III and Title VI programs and services

Section 307(a)(21) requires assurance that the State agency will coordinate programs under Title III and programs under Title VI, if applicable; and the State agency will pursue activities to increase access by older individuals who are Native Americans to all aging programs and benefits provided by the agency, including programs and benefits provided under this title, if applicable, and specify the ways in which the State agency intends to implement the activities.

The Bureau of Aging and Disability Resources will continue the following longstanding allocation practices during the 2019-21 State Aging Plan period, to increase access by Native American elders to all aging programs and benefits:

1. Continue a minimum allocation of Title III-B funds for each tribe.

2. Continue to allocate tribes an amount of Title III-B funds at least equal to the previous year's allocation.

3. Continue to allocate tribes an amount of Title III-C1 funds at least equal to the previous year's allocation.

4. Continue to allocate tribes an amount of Title III-C2 funds at least equal to the previous year's allocation.

5. Continue to allocate tribes an amount of Title III-D funds at least equal to the previous year's allocation.

When there are annual increases or decreases in federal funds awarded to the State under Title III, there may be similar statewide increases or decreases in the amount allocated to AAAs to be distributed to aging units for each of these funding sources. When there is an across-the-board federal increase or decrease in Title III, there shall be an across-the-board increase or decrease in the county and tribal distributions under Title III.

In addition to the fiscal policies outlined above, BADR enacts a number of more general policies and practices to support the delivery of programs and services through Tribal Aging Units. During the 2019-21 State Aging Plan period BADR will:

1. Continue to enhance the capacity of the tribal technical assistance center located at the Great Lakes Inter-Tribal Council.

2. Continue to require and support tribal aging units.

3. Require that area agencies establish targeting goals for the provision of services to minority elders, including Native American elders, for all Title III funded services.

4. Require that area agencies monitor and provide technical assistance to aging units on service to Native American elders.

5. Include focused workshops on services to Native American elders in conferences and training sessions sponsored by the Bureau of Aging and Disability Resources.

6. Encourage county aging units to work with tribal aging units to assist Native American elders in gaining access to county services, such as the Family Care Program and Benefit Specialist Program.

7. Regularly participate in activities of appropriate Native American aging organizations.

8. Continue to provide state matching funds to support Corporation for National and Community Service programs such as the Foster Grandparent Program, RSVP, and the Senior Companion Program operated by the Great Lakes Inter-tribal council.

Additional Considerations: Cost Sharing and Voluntary Contributions

Wisconsin does not require cost sharing for Title III program participants. Wisconsin's AAAs and Aging Units do make program participants aware that voluntary contributions are appreciated and are used to support costs associated with the program operations. As an example the state's Elder Nutrition programs are partially funded by participant contributions in addition to state funding and Title III dollars.

BADR requires all AAAs to consult with Aging Units to develop methods for collecting and accounting for voluntary contributions. Aging Units inform program participants there is no obligation to make contributions and that receipt of program services is not contingent upon making contributions.

AAA and Aging Units will protect the privacy and confidentiality of each program participant with respect to their contribution. All contributions will be used to maintain or expand services for which the contributions are given.

Additional Considerations: Public Review of the Financial Plan

The completed State Plan was posted for a two-week public review and comment period, along with a survey to facilitate responses. The survey included a number of Likert-scaled rating variables allowing reviews to indicate how well or poorly the Plan achieves specific objectives, and in addition encourages open-ended comments and suggestions in response to two prompts. Because the Financial Plan (Attachment C) was still undergoing revisions requested by ACL at the time the complete Plan was posted, it was posted with the rest of the State Plan in an executive summary format that explained the rationale and strategy of the allocation formula changes and invited interested readers to request the complete Financial Plan. During this initial review period, one person asked to see the complete Financial Plan.

After the revisions requested by ACL were completed, the full, revised Financial Plan was posted to the DHS website for ten days. All stakeholder distribution lists carried an email noting that it was available and inviting emailed reviews and suggestions. During this period, ___ individuals accessed the Financial Plan and ___ submitted comments. The content of the comments can be summarized as follows:

In consideration of the comments, BADR will…

[NOTE: These details will be supplied after the public review is complete]