**Report in Brief**
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U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES
OFFICE OF INSPECTOR GENERAL

# Missouri May Not Have Used All CARES Act Funds for the Older Americans Act Nutrition Services Program in Accordance With Federal and State Requirements

## Why OIG Did This Audit

COVID-19 created extraordinary challenges for the delivery of health care and human services to the American people. During the public health emergency, many State and local governments instituted stay-at-home orders, which mandated individuals to stay confined to their homes except for essential activities. There was an increased need for home-delivered meals for older individuals. Congress passed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which provided $480 million for the Older Americans Act (OAA) Nutrition Services Program distributed by the HHS, Administration for Community Living (ACL). ACL awarded Missouri $9 million in CARES Act funds for the OAA Nutrition Services Program.

Our objective was to determine whether Missouri used CARES Act funds for the OAA Nutrition Services Program in accordance with Federal and State requirements.

## How OIG Did This Audit

Our audit covered measures implemented by Missouri's 10 Area Agencies on Aging (AAAs) during the CARES Act award period of April 1, 2020, through September 30, 2021. We judgmentally selected 3 OAA nutrition expense transactions from each of the 10 AAAs in Missouri. We reviewed supporting documentation for the 30 selected transactions (which totaled $337,906) to analyze Missouri's use of CARES Act funds for this program.

## What OIG Found

Missouri may not have used all CARES Act funds for the OAA Nutrition Services Program in accordance with Federal and State requirements. Specifically, none of the 10 AAAs in Missouri could give us separate accounting records that delineated the CARES Act expenditures to support the charges against the Federal award for these nutrition services. The AAAs could, however, provide lists of home-delivered nutrition program expenditures for the timeframe in which Missouri reimbursed AAAs for Nutrition Services Program expenditures with CARES Act funds.

The AAAs could not delineate their CARES Act expenditures for nutrition services because they were conforming to the State's process, under which Missouri assigned a funding source to expenditures only after the AAAs had submitted their monthly service and expenditure reports. Also contributing to these vulnerabilities was the fact that although Missouri monitored program and financial activities of the AAAs annually, it did not specifically monitor use of CARES Act funds. As a result of these vulnerabilities in Missouri's process, the State may have used CARES Act funds in a manner that did not comply with Federal and State requirements.

## What OIG Recommends and Missouri Comments

We recommend that Missouri require AAAs to track expenditures for supplemental awards by funding source, when required by Federal guidance, especially in instances of pandemic-related or other disaster relief funding; and consider implementing additional monitoring activities whenever the State receives large supplemental funding disbursements.

Missouri concurred with both of our recommendations and described actions that it had taken or planned to take to address them. For our first recommendation, Missouri stated that it would require the AAAs to track expenditures for supplemental awards by funding source, and added that it would improve communication by providing monthly reconciliation of the funding source used for each AAA for all future invoices. For our second recommendation, Missouri stated that it would implement increased monitoring whenever it receives large supplemental funding disbursements, and that it would do so immediately. We commend Missouri for these actions to address our recommendations.

The full report can be found on the OIG website.