

POLICY AND PROCEDURE MANUAL TITLE III GRANTS

SOUTHWESTERN CONNECTICUT
AGENCY ON AGING
10 Middle Street
Bridgeport CT 06604
203 333-9288
www.SWCAA.org

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SOUTHWESTERN CONNECTICUT AGENCY ON AGING

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I. GENERAL INFORMATION

A. Purpose of Title III Funds

The purpose of Title III of the Older Americans Act of 1965, as amended, is to encourage and assist state and local agencies in the development of comprehensive and coordinated systems to serve older individuals through cooperative planning and the provision of supportive services in order to:

- secure and maintain maximum independence and dignity in a home environment for older persons capable of self-care with appropriate supportive services;
- remove individual and social barriers to economic and personal independence for older individuals;
- provide a continuum of care for vulnerable older individuals; and
- secure the opportunity for older individuals to receive community-based long-term care services.

B. Role of Agency on Aging

The role of the Southwestern Connecticut Agency on Aging, hereinafter "SWCAA" or "the Agency on Aging", is to plan, coordinate, and advocate for the development of a comprehensive service delivery system to meet the needs of older residents of the 14-town southwestern Connecticut area. The functions of SWCAA include:

- Assessment of needs
- Establishment of objectives and priorities
- Distribution of federal and state funds for key services
- Coordination of services
- Development of resources
- Monitoring and evaluation of programs
- Collection and dissemination of information
- Technical assistance and training
- Leadership and advocacy
- Public information and assistance

C. Area Plan

Specific goals and objectives are set by SWCAA in an Area Plan which establishes priorities for a 4-year planning period. **In order to be funded, proposed projects must address one or more of the objectives listed in the SWCAA Area Plan.** A summary of the Area Plan can be viewed at www.SWCAA.org or a copy may be requested from the SWCAA grants manager.

D. SWCAA Funding Policy

SWCAA funding policy will establish priorities for the distribution of available grant funds:

1. for services that address priority needs established in the Area Plan, especially among low income and minority elderly;
 2. for new services which specifically respond to priority needs established in the Area Plan;
- and

3. for projects that are able to utilize Title III funds to leverage additional funding. State regulations require that service providers initiate efforts to obtain support from private sources and other public organizations for services funded.

SWCAA will establish timelines and formulas according to which applicants may reasonably anticipate funding.

Components of SWCAA funding policy:

1. SWCAA will work with local and regional planning bodies of the area in its planning for the allocation process for Title III funding.
2. All programs must address needs and priorities established in the Area Plan.
3. Programs will be funded contingent on available funding and the geographic distribution of elderly population.
4. Programs will be evaluated based on the following criteria:
 - a. the clientele served;
 - b. administrative and programmatic effectiveness; and
 - c. ability to secure additional resources.
5. Whenever possible, services which address priority needs will be funded by performance-based contracts.
6. If a competitive bidding process is necessary for a specific area or need, the Agency on Aging reserves the right to:
 - a. Reject any or all bids:
 1. Any bid may be rejected if it is too high
 2. Any bid may be rejected if it does not meet specifications or if it is incomplete.
 - b. Solicit new bids if no acceptable bids are received.
 - c. Accept non-competitive bids and negotiate price and/or specifications if service is available from only one source; or public emergency exists; or, after solicitation, competition is determined to be inadequate.

II. GRANT CATEGORIES

See each year's Request for Proposals for details of funding priorities established for that fiscal year.

Title III B—Supportive Services and Senior Centers

1. Services which assist seniors gain **access** to available services, including:
 - services designed to encourage and assist older persons to use the facilities and services available to them such as outreach and information/assistance.
 - transportation services to facilitate access to supportive services or nutrition services;
2. **legal assistance** and other counseling services;
3. **in-home services**, including: homemakers, home health aides, visiting and telephone reassurance, chore service, in-home respite, respite adult day care, minor home repair and modification, personal care services, and other services that assist older individuals to live independently in a home environment;

4. multipurpose senior center activities with preference for focal points designated by SWCAA;
5. services designed to assist older persons in avoiding institutionalization, including pre-institutionalization evaluation and screening, home health and other in-home services and supportive services to families;
6. services designed to assist older persons to obtain adequate housing, including residential repairs, adaptation to meet the needs of older persons with physical disabilities, and installation of security devices;
7. mental health services;
8. dental services;
9. any other services deemed necessary for the general welfare of older persons; including:
 - assistive services and technology devices
 - crime prevention
 - employment services
 - prevention of abuse
 - support of family caregivers
 - guardians or representative payees
 - programs providing interaction with students
 - dissemination of information about life-long learning programs
 - preretirement counseling

Priority for Title III-B funds will be given to proposals which address the three national priority areas established by the Older Americans Act of Access, Legal, and In-Home Services.

Title III C—Nutrition Services

See The Elderly Nutrition Program Resource Manual for policies and procedures concerning nutrition services, available at www.ctagenciesonaging.org.

Title III D—Disease Prevention & Health Promotion Services

Disease prevention and health promotion services and information provided at multipurpose senior centers, at congregate meal sites, through home delivered meals programs, or at other appropriate sites. Priority areas for Title III D funds are: areas (1) which are medically underserved; and (2) in which there are a large number of older individuals who have the greatest economic need for such services.

A portion of the available Title III D funds will be awarded for each of the following services:

1. medication management screening and education to prevent incorrect medication and adverse drug reactions; and
2. evidence-based health promotion programs. These programs must be research-tested and/or clinically evaluated and proven to provide adults 60 and over with positive health outcomes in a community-based setting. To be eligible for funding, programs must be recognized as evidence-based by
 - The National Council on Aging; or
 - The Centers for Disease Control.

Title III E—Grandparents Raising Grandchildren

Supportive services for grandparents or older individuals who are relative caregivers (aged 55 and older) of a child who is not more than 18 years of age or who is an individual with a disability. Priority shall be given to caregivers who provide care for children with severe disabilities. Services may include:

1. Information about available resources and services;
2. Assistance locating and accessing services;
3. Individual counseling;
4. Support group development and/or resources; and
5. Caregiver training.

Title III E—National Family Caregiver Support Program

Supportive services for adult (aged 19 or older) family members or other individuals who are informal providers of in-home and community care to an individual aged 60 or older. Priority shall be given to family caregivers who provide care for individuals with Alzheimer's disease and related disorders. Services may include:

1. Information about available caregiver resources and services;
2. Assistance locating and accessing caregiver services;
3. Individual counseling;
4. Support group development and/or resources;
5. Caregiver training; and
6. Non-traditional respite services.

III. FUNDING REQUIREMENTS

A. Eligible Grantees and/or Contractors

Public, incorporated private 501(c)3 non-profit, or private for-profit agencies in good standing with the office of the Connecticut Secretary of State that provide service within SWCAA's fourteen-town area. Before awarding grants to for-profit agencies, SWCAA must obtain approval from the State Unit on Aging.

B. Funding Limitations

1. The amount of available Title III funding depends on federal Older Americans Act funding determined by Congress and matching state funds approved by the Connecticut legislature each year. **Awards are contingent on the receipt of federal and state funds by SWCAA from the State Unit on Aging.** The amount of funds available will be estimated when original awards are made. When funding levels are final, grant awards may be adjusted, if necessary.
2. The maximum award allowed for any program is \$50,000 per fiscal year except under extraordinary circumstances.
3. Funding amounts for grants and contracts will be approved for one year at a time. Prior to the award of additional support for any subsequent year, SWCAA will conduct an on-site evaluation of the project and review MIS and financial reporting to determine if the objectives of the project are being met. The decision to continue funding of projects is based

on the current SWCAA funding policy, the availability of funds, and the performance of the project, including progress made to secure other continuing funding resources.

C. Multi-Year Awards

SWCAA may offer the opportunity to apply for multi-year awards, the term of which may not exceed three (3) years. Under a multi-year award, an agency will be designated as the service provider for more than one fiscal year and funding levels for all years will be established, contingent upon satisfactory performance and the availability of federal and state funds. Actual awards will be made one year at a time.

Eligibility criteria for multi-year awards will include the following:

- The project provides a service in the particular grant category or categories being considered for multi-year grants in the year of initial application; and
- The project has been funded by SWCAA for at least five (5) years during which time it has:
 - received satisfactory program reviews,
 - received satisfactory audit reviews,
 - completed all reporting requirements in a timely manner,
 - not been placed on probationary status, and
 - not had a history of difficulties in service delivery or contract management as identified by SWCAA or other funders.

For each multi-year application, SWCAA reserves the right to:

- make a single-year or a multi-year award;
- award the full amount requested;
- award a lower amount than requested; or
- reject the application, in whole or in part.

SWCAA reserves the right to re-issue the Request for Proposals (RFP) in any or all service areas and for any or all services if it is determined that a new RFP is in the best interest of SWCAA or the client population.

For each year following the year of initial application, grantees must submit a renewal application no later than the established deadline for Title III applications. The renewal application will include:

- application face sheet with original signature;
- complete budget package;
- budget narrative, if needed;
- targets;
- description of any programmatic or staff changes; and
- additional materials as requested by SWCAA.

Awards for the years following the year of initial application will be contingent on:

- availability of federal and state funds and
- a satisfactory performance evaluation. Failure to receive a satisfactory evaluation may result in probationary status or termination.

Performance evaluations will include:

- client interviews;
- review of services provided;
- identification of problem areas and possible solutions;
- participation by members of grantee agency's Board in site visit;
- agency audit; and
- any other evaluative information deemed helpful by the Allocations Committee.

D. Types of Awards

Title III funds may be awarded in the following formats:

1. Grant—An agreement between two parties whereby financial assistance is provided to carry out a specific program, service, or activity. Grant funds are disbursed during the fiscal year based on program expenditures; or
2. Performance-based Contract—An agreement between two parties whereby a specific service is purchased at a pre-determined rate. Grant funds are disbursed during the fiscal year at an agreed-upon unit rate based on the number of services actually provided.

E. Non-Federal Match Requirement

ALL Title III funded projects must include matching funding from non-federal sources. These may be either cash or in-kind services, such as building space, utilities, personnel time, equipment, etc., that are not being used as a match for another federal program. In-kind services shall be valued using standard guidelines (available at www.independentsector.org/programs/research/volunteer_time.html). Community Development Block Grant funds are the only federal funds that may be used as match. Project income such as third-party reimbursements, fees, etc., is allowable as non-federal match. Client contributions may not be included in non-federal match.

1. Non-federal match for Title III B—see declining funding formula below
2. Non-federal match for Title III D must be at least 15% of the total project budget
3. Non-federal match for Title III E must be at least 25% of the total project budget

F. Declining Funding Formula

Title III B grants will be subject to a three-year declining funding formula. Programs are encouraged to maintain service levels as agreed upon in their initial awards and to continue to address demonstrated local needs. Non-federal match for Title III B must comprise:

- at least** 15% of the first-year budget,
- at least** 30% of the second-year budget, and
- at least** 50% of the third- and subsequent-year budgets *

Match may be provided in any combination of cash and/or in-kind support.

The following tables provide examples of budget options.

EXAMPLE A

SWCAA funds decrease as non-federal match requirement increases; total program budget remains the same.

<u>Year</u>	<u>Match Requirement</u>	<u>SWCAA Award</u>	<u>Non-federal Match</u>	<u>Total Budget</u>
1	15%	\$30,600	\$ 5,400	\$36,000
2	30%	\$25,200	\$10,800	\$36,000
3 and beyond	50%	\$18,000	\$18,000	\$36,000

EXAMPLE B

SWCAA funds remain the same as non-federal match requirement increases; total program budget increases each year.

<u>Year</u>	<u>Match Requirement</u>	<u>SWCAA Award</u>	<u>Non-federal Match</u>	<u>Total Budget</u>
1	15%	\$10,000	\$ 1,765	\$11,765
2	30%	\$10,000	\$ 4,286	\$14,286
3 and beyond	50%	\$10,000	\$10,000	\$20,000

*In the third and subsequent years: the SWCAA award may not exceed 50% of total program cost. Any proposed program expansion must be partially funded by at least 50% non-federal match.

This policy does not guarantee continued funding or funding at the level requested for any applicants. Programs will be funded contingent on available funding and upon a favorable evaluation. However, programs will not be considered for funding if they do not meet the minimum match requirement. For purposes of the declining funding formula, the number of years will be determined by counting the total number of years of Title III grant funding for each particular project.

G. Other Funding Requirements

1. Title III grant funds may not be used to replace current funding from other sources.
2. Providers must continue to seek other sources of funding for their project from private or other public sources. Gifts and other grants from foundations, corporations, etc., should be used to enhance the program and should be reported as non-federal match.
3. Costs incurred prior to the beginning of the award may not be included in program budgets or expenditure reports.
4. Administrative & General (A&G) costs may not exceed 20% of the total program budget.
5. Any Title III funds not earned in the approved project period shall be returned to the Agency on Aging within sixty (60) days following the end of the funding period.

IV. PROGRAM REQUIREMENTS

A. Focus of Services

1. All persons 60 or over are eligible for services funded through the Older Americans Act.
2. Priority shall be given to those activities and services which assist and benefit target group older persons with the greatest economic and social needs, with particular attention to low-income and minority individuals, older individuals with limited English proficiency, older individuals at risk for institutional placement, and older individuals residing in rural areas. Applicants must be able to serve low-income and minority older persons at least in proportion to their representation in the total elderly population within their service area and must have a plan for outreach to these populations. Census data for southwestern Connecticut is available at www.SWCAA.org.
3. Clients served by funded projects must live in, or receive services in, one of the fourteen towns served by SWCAA: Bridgeport, Darien, Easton, Fairfield, Greenwich, Monroe, New Canaan, Norwalk, Stamford, Stratford, Trumbull, Weston, Westport, and Wilton.
4. All projects must address at least one need identified in the SWCAA Area Plan and must provide a service defined in "Service Codes and Definitions". See www.SWCAA.org.

B. Client Contributions

Individuals who benefit from funded services shall be given the opportunity to contribute to all or part of the cost of the services provided. However, the method of solicitation must be non-coercive, means testing may not be utilized, and no older person shall be denied services because of his or her failure to contribute to all or part of the cost of such service. The amount of each individual's contribution shall be kept confidential. Appropriate procedures must be in place to safeguard and account for all contributions. Client contributions may **not** be used as non-federal match. All collected contributions must be used to expand the service for which the contributions were given and to supplement (not supplant) Title III funds received.

C. Public Information

All publicity about a Title III-funded project must:

1. identify the Agency on Aging and the Older Americans Act as a funding source; e.g., "This project (program, service) is funded in part by the federal Older Americans Act through the Southwestern Connecticut Agency on Aging," and
2. include a statement that all older persons (60 or over) are eligible for services under the approved project.

D. Grievance Procedure

As required by the Older Americans Act, the Agency on Aging has established a grievance procedure for older individuals who are dissatisfied with or denied services. All organizations funded by SWCAA are required to adopt a grievance procedure which allows appeal to the organization's Board of Directors or equivalent body to hear, on an impartial basis, the nature of the complaint and to respond accordingly.

A copy of each funded organization's grievance procedure and the method by which it will be made known to individuals seeking or currently receiving services shall be placed on file at the SWCAA office. A written determination shall be given to the complainant together with

information stating that if the individual remains dissatisfied, the complaint may be taken to the Agency on Aging.

Upon receipt of the unresolved complaint, a committee appointed by the SWCAA Board, with representation from its Board and Advisory Council, shall hold a hearing for the purpose of receiving testimony from the individual filing the complaint and documentation from the organization against which the complaint is filed. If the matter is not resolved by the committee to the satisfaction of the individual, the complainant has thirty days to file further evidence to be heard by the SWCAA Board of Directors.

If the matter is not resolved by the SWCAA Board of Directors to the satisfaction of the individual, the complainant may appeal to the State Unit on Aging.

In the case of a denial of services due to alleged discrimination, clients are encouraged to contact the State Unit on Aging about such complaint.

E. Additional Required Program Components

Every funded project must:

1. submit monthly financial and service (Management Information System [hereinafter "MIS"]) reports required for federal NAPIS system) reports;
2. have a defined system to obtain client input about the services provided. The system must include methods to solicit, review, and take appropriate action on comments from project participants;
3. have a defined plan to conduct outreach efforts that will identify individuals eligible for assistance under Title III of the Older Americans Act, with special emphasis on reaching those with the greatest economic and social needs (with particular attention to low-income minority individuals);
4. assure that no information about, or obtained from, an individual receiving a SWCAA-funded service shall be disclosed in a form that identifies the individual, without the written informed consent of that individual or his or her legal representative. Disclosure required by court order or for other program monitoring by authorized federal, state, or local monitoring agencies or for use in the State Unit on Aging's MIS is considered part of the monitoring system and providers are required to disclose this information without the informed consent of the individual or authorized representative;
5. where possible and appropriate, make arrangements for the availability of service to older persons in weather-related emergencies;
6. assist clients in taking advantage of benefits under other programs;
7. with the consent of the older person, or his or her representative, bring to the attention of appropriate officials for follow up, conditions or circumstances which place the older person at risk; and
8. assure that the services funded by the Agency on Aging are coordinated with other appropriate services in the community and that these services do not constitute an unnecessary duplication of services provided by other sources.

F. Starting Time for Approved Projects

Normal project period is based on the federal fiscal year: October 1 through September 30 of the following year. It is expected that each approved project will start no later than 30 days after the official beginning date shown on the Notification of Grant Award.

G. Compliance

All programs funded by SWCAA must be in compliance with federal, state, and local laws, regulations, and licensure which specifically apply to the type of services being provided. In addition, all programs must be operated in compliance with the following as they may be amended from time to time:

- Older Americans Act of 1965, as amended
- Title 45 Code of Federal Regulations Part 1321 – Grants for State and Community Programs on Aging
- Community Services Policy Manual for Title III Programs of the Older Americans Act, Connecticut Department of Social Services Elderly Services Division
- Title VI of the Civil Rights Act of 1964
- Section 504 of the Rehabilitation Act of 1973, as amended
- Age Discrimination Act of 1975, as amended
- Public Act 91-407 Sec. 8 and 91-58 Sec.16(b)
- SWCAA regulations and policies
- Americans with Disabilities Act of 1990
- Federal Drug-Free Workplace Act of 1988
- Federal OMB Circular A-110, A-102 (if governmental), and A-133
- Applicable sections of the Connecticut General Statutes Annotated Sections including, but not limited to:
 - non-discrimination and affirmative action in contracts of the state, C.G.S.A. Section 4z-60
 - non-discrimination regarding sexual orientation, C.G.S.A. Section 42-60a
 - whistleblower provisions, C.G.S.A. Section 4-61dd
 - non-smoking, C.G.S.A. Section 31-40q
- Connecticut Public Act 07-1 concerning campaign contribution restrictions
- Applicable Connecticut Executive Orders including, but not limited to:
 - No. 3 concerning non-discrimination
 - No. 16 concerning workplace violence prevention policies
 - No. 17 concerning Connecticut State Employment Service listings
 - No. 7c concerning the Contracting Standards Board
 - No. 14 concerning the procurement of cleaning products and services.

H. Affirmative Action

SWCAA embraces a policy of equal opportunity and affirmative action in all operations, especially in the important areas of employment, the awarding of grants and contracts, and the delivery of services to the elderly.

SWCAA undertakes to make all decisions regarding recruiting, hiring, promotion, and provision of services without discrimination on grounds of race, national origin, religion, gender, sexual

orientation, marital status, age or physical or mental handicap; it also makes specific affirmative efforts to identify and overcome the negative effects of prior or current societal discrimination on all of SWCAA operations and those of its grantee agencies and contractors.

SWCAA's commitment to the principle of affirmative action is manifested through the development and periodic up-grading of an Affirmative Action Plan, which includes specific goals and timetables, actions designed to achieve stated goals, delegation of responsibility, and the continual monitoring of performance by the supervisory staff and the Board of Directors.

Every applicant is required to submit an Affirmative Action Plan, updated for the project year, containing, at least, the following components:

1. A policy statement with the signature of the Chairman of the applicant agency;
2. A grievance procedure relating to affirmative action issues;
3. A vendor's statement (to be completed by the applicant agency as well as by any subcontractors);
4. The name of the Affirmative Action Officer of the applicant agency; and
5. Specific hiring goals and timetables for the project year.

V. APPLICATION PROCEDURES

Throughout the application process, applicants are responsible for meeting all stated deadlines, accessing technical assistance, and following up to ensure that all documents are received by the Agency on Aging.

A. Request for Proposals (RFP)

SWCAA issues a Request for Proposals for Older Americans Act funds each year, usually in February. This initiates the process of soliciting applications for award of Older Americans Act funds for the federal fiscal year beginning the following October. The Request for Proposals announces the purpose and estimated amount of available funding. It may include specific priority services for the upcoming fiscal year and/or services to be considered for multi-year grants. Distribution of the Request for Proposals is through:

1. Mailing to a list of current grantees and other interested provider agencies and municipalities in the region. To be added to this mailing list, send your contact information to pknebel@SWCAA.org;
2. Publication of legal notices in the area's public media; and
3. Posting on www.SWCAA.org.

B. Letter of Intent (LOI)

Those agencies wishing to receive an application package must submit a Letter of Intent by the specified deadline. The Letter of Intent form is included with the Request for Proposals mailing and is available at www.SWCAA.org. Letters of Intent are reviewed by SWCAA staff to determine general applicability to funding criteria. Applicant agencies may be contacted by SWCAA staff to clarify intent and assure that the proposed project relates to the funding criteria. Every agency that submits a Letter of Intent will receive either an application package or a letter

explaining how its proposal does not meet the funding criteria. The Agency on Aging's response to Letters of Intent will be provided before the scheduled date for the technical assistance session.

C. Technical Assistance

A technical assistance session will be scheduled approximately one week after the Letter of Intent deadline. **All new applicants or applicants who are not current grantees** who intend to submit a funding application are **REQUIRED to attend the technical assistance session**. Applications will not be accepted from applicants who do not attend the technical assistance session and are not current grantees. Attendance is optional but strongly encouraged for grant writers who have not previously completed a SWCAA application, even if the agency is a current grantee. Prospective applicants should review the application package prior to the technical assistance session.

D. Application for Project Award

The application deadline will be published in the Request for Proposals and in the application package. **NO APPLICATIONS WILL BE ACCEPTED AFTER THE PUBLISHED DEADLINE.** Renewal applications for projects with multi-year awards will be required by the same deadline.

All applications must be submitted typed and stapled (do not bind) and shall include the following:

1. One (1) ORIGINAL complete application including original signatures and all attachments; and
2. Ten (10) copies of the proposal excluding attachments and audit material. No extraneous material will be accepted.

Applicants must complete each section and sub-section of the application whether submitting the full application or a multi-year renewal application. If a section or subsection does not apply to your program, please list the section and note "Not Applicable." Budgets must be accurate.

The contact person for technical assistance in completing the application is Patricia Knebel, Grants Manager, at the SWCAA office (203 814-3637) or pknebel@swcaa.org.

E. Proposal Review and Award Process

1. SWCAA staff will review applications for completeness. SWCAA staff may contact the applicant for clarification, if necessary.
2. Complete copies of applications will be distributed to members of the SWCAA Allocations Subcommittees for review. Allocations Subcommittees are made up of SWCAA Board of Directors and Advisory Council members.
3. The SWCAA Allocations Subcommittees will meet to discuss applications in late May or early June. Applicants with new proposals may be invited to meet briefly with a Subcommittee to answer subcommittee members' questions.
4. The Allocations Subcommittees make award recommendations. The Allocations Committee reviews all subcommittee recommendations and presents a final recommendation to the SWCAA Board of Directors.

5. The SWCAA Board of Directors votes on awards the third Thursday in June. For each application reviewed, SWCAA reserves the right to:
 - award the full amount requested;
 - award a lower amount than requested; or
 - reject the application, in whole or in part.
6. Award letters are mailed to all applicants by the day following the Board decision.

F. Appeals Process

Any applicant for a grant or contract from/with SWCAA whose application is rejected or approved in an amount that is at least 25% less than the amount requested may appeal the funding decision of the Board of Directors of SWCAA if and only if there is evidence that SWCAA's funding process, as defined in its Policy and Procedure Manual, was not followed.

The applicant shall initiate the appeal process by submitting a written appeal request to the Chairman of the SWCAA Board of Directors and a copy to the SWCAA Executive Director within ten (10) business days following the dispatch date of the written notification of the SWCAA decision. The request shall:

1. identify the section of the Policy and Procedure Manual the applicant believes was not followed; and
2. state with specificity how the applicant believes the funding process has been violated; and
3. be dispatched or hand delivered within ten (10) business days from the dispatch date of SWCAA's written notification.

Upon receipt of a request to appeal, the Chairman of the SWCAA Board of Directors and the SWCAA Executive Director shall screen the request to determine whether on its face it meets the qualifications listed above and shall send the applicant a written notice as to the decision within ten (10) business days of the dispatch date of the written appeal request. If the appeal request on its face meets the qualifications, said written notice shall include the date set for a hearing before the SWCAA Board of Directors not later than twenty (20) business days following the dispatch date of the written appeal request. At the hearing, the applicant shall be given an opportunity to make a statement and present further evidence to support the applicant's claim. The Board may ask questions of the applicant. The Board shall review the appeal on its merits and dispatch a written decision as to the claim within ten (10) business days of the hearing. Within this paragraph, the terms SWCAA Board of Directors, Chairman of the SWCAA Board of Directors, SWCAA Executive Director and applicant shall be deemed to include "or its, her or his designee(s)" in all references.

For the purposes of the preceding two (2) paragraphs, the date of dispatch shall be evidenced by postmark, postal or other receipt, indicating date and place of sending or hand delivery.

If the appeal is rejected or denied, the applicant may appeal the SWCAA decision to the Connecticut Department of Social Services, by submitting a written request to the Connecticut Department of Social Services Office of Legal Counsel and Administrative Hearings, 25 Sigourney St., Hartford, CT 06106 and a copy to the SWCAA Executive Director within thirty (30) calendar days of receiving written notice from SWCAA. (Revised 11/2011)

VI. POST AWARD PROCEDURES

A. Notification of Award

1. After approval of the grant/contract by the SWCAA Board of Directors, the applicant is notified in writing of the decision.
2. If the award is for an amount different from that requested, revised budgets, service targets, and other additional information shall be required before the formal Notification of Award can be issued.

B. Acceptance of Award

Grant/Contract documents, which include conditions and obligations of the grantee, are prepared and forwarded to the recipient agency. The following must be signed by an authorized official of the recipient agency and returned to SWCAA before any payment on the grant will be made:

1. Letter of Acceptance of grant award. **An applicant offered a grant or contract must accept or reject the offer within 45 days of the date of issuance by returning the signed Letter of Acceptance issued by the Agency on Aging or rejecting the award in writing.** Should no correspondence indicating either acceptance or rejection be received within the 45-day period, the Agency on Aging will consider the offer rescinded on the 46th day and will so notify the applicant in writing.
2. Contract for those with performance-based contracts

In addition, the following documentation must be provided by the grantee before any grant payments will be made:

1. Grievance procedure for clients denied service; and
2. Certificate of insurance naming SWCAA as additional insured (grantee's insurance agent must provide).

C. Starting Time for Approved Project

The normal project period is based on the federal fiscal year: October 1 through September 30 of the following year. It is expected that each approved project will start no later than 30 days after the official commencement date referenced on the Notification of Grant Award.

D. Reporting Requirements

The grantee shall maintain an accurate account of expenditures of both the federal and the non-federal portions of the grant budget and submit monthly Financial Reports or invoices; shall maintain appropriate records of clients served and services provided; shall submit monthly MIS reports on forms provided by the Agency on Aging; and shall submit additional reports and attend training sessions as required by the Agency on Aging.

Due dates for the submission of reports to the Agency on Aging:

1. Financial Reports
 - a. By the 15th of each month, monthly Financial Reports for previous month for grants; or
 - b. By the 15th of each month, an invoice for services provided during the previous month for contracts; and

- c. Not later than November 30th, Final Financial Reports for the project year ending on September 30th. If project funding is for a different time period, a Final Financial Report is due within two (2) months after completion of the program period.
2. MIS Reports on clients served and services provided the previous month:
By the 15th of each month, all completed MIS forms for the previous month. SWCAA plans to return MIS reports by the end of the month for all projects whose reports were received in a timely manner.

Payment will be withheld for failure to submit any required reports by the scheduled dates. Failure of a recipient to meet financial and program reporting requirements for 120 days will result in termination of award.

E. Program Monitoring and Evaluation

SWCAA is responsible for the monitoring of Title III-funded programs. SWCAA's monitoring process includes but is not limited to:

1. review of monthly MIS and/or other service performance reports;
2. review of monthly Financial Reports or invoices;
3. on-site visits to agencies by SWCAA staff and members of SWCAA's Board and Advisory; and
4. review of year-end report from award recipients.

The purpose of monitoring is to ensure that:

1. program objectives are met;
2. award recipients are accountable both programmatically and financially under the terms and conditions of the award; and
3. alternative program strategies are developed if those previously conceived are not feasible.

F. Changes in Program

Any changes in program objectives, program budget, staffing plan, geographic area of service, or other changes in the approved project must have prior approval of the Agency on Aging. All requests for changes must be submitted at least 60 days before the end of the fiscal year.

Prior approval from the Agency on Aging is needed for a line item change in the approved budget appearing on the Financial Report that involves:

1. change in a line item unless the change affects less than \$500 or 20% of a line item, whichever is lower; or
2. establishment of a new line item.

Budget Change Request forms may be requested from the SWCAA grants manager at any time.

G. Access to Information

All records pertaining to a grant issued by the Agency on Aging shall be kept on file for a minimum of five (5) years after final payment and closure of all pending matters and shall be made available for a state or federal audit.

H. Project Termination

If a grantee fails to provide services in accordance with the approved grant, SWCAA may terminate the grant, giving the grantee in writing the reasons for such termination. The grantee has the right to appeal to the SWCAA Board of Directors. If a grantee wishes to terminate a project prior to its expiration date, a written notice of such termination shall be given to the Agency on Aging at least thirty (30) days in advance of the requested termination date.

VII. FINANCIAL MANAGEMENT

A. Reporting and Record Keeping

The grantee shall maintain an accurate account of expenditures of both the federal and the non-federal portions of the grant and submit monthly Financial Reports or invoices, submit additional reports and attend training sessions as required by the Agency on Aging.

Due dates for submission of Financial Reports to the Agency on Aging:

1. Financial Reports
 - a. By the 15th of each month, monthly Financial Reports for previous month for grants; or
 - b. By the 15th of each month, an invoice for services provided during the previous month for contracts; and
 - c. Not later than November 30th, Final Financial Reports for the project year ending on September 30th. If project funding is for a different time period, a Final Financial Report is due within two (2) months after completion of the program period.
2. Agency Audit

As soon as available each year, a copy must be forwarded to the SWCAA Grants Manager. Any agency required to obtain a single audit must include that report with the regular audit.

Payment will be withheld for failure to submit any required reports by the scheduled dates. Failure of a recipient to meet financial and program reporting requirements for 120 days will result in termination of award.

B. Maintenance of Records

1. Accounting records, supporting documents, statistical records, and all other records pertinent to the grant or contract shall be maintained and available for examination by personnel of SWCAA, state, and federal agencies.
2. Such records shall be retained by grantees for a minimum period of five (5) years from the date the grantee submits its last expenditure report.

C. Audit

Public and private non-profit agencies receiving federal funds must comply with all applicable government audit standards and requirements. Title III funds must be clearly identified in agency-wide audits. An audit report must be submitted with the initial application and subsequent year audits for each funded agency must be sent to SWCAA as soon as available. Any agency required to obtain a single audit must include that report with the regular audit.

D. Payment Procedures

1. SWCAA payments to grantees are made based upon availability of federal and state funds.
2. Monthly payments, beginning in November, will be made to grantees who are up-to-date with reporting requirements. Quarterly payments may be made on smaller grants. Checks are usually mailed the last week of the month.
3. Monthly payments will be made to contract recipients based on the units verified by MIS reports for the previous month. Checks are usually mailed the last week of the month. If MIS reports and invoices are not received by the 15th of the month, payments may be delayed until the following month.
4. Final grant payment will be based on grant funds earned as evidenced by Financial Reports received. The amount of Title III funds earned is the lowest of:
 - total reported expenditures multiplied by the federal share percentage, shown on the Notice of Grant Award and on the Financial Report form;
 - actual total Title III expenditures; or
 - total grant award.

E. Unearned Funds

Any Title III funds not earned in the approved project period shall be returned to the Agency on Aging within sixty (60) days following the end of the funding period.

F. Budget Changes

Prior approval from the Agency on Aging is needed for a line item change in the approved budget appearing on the Financial Report which involves:

1. change in a line item unless the change affects less than \$500 or 20% of a line item, whichever is less; or
2. establishment of a new line item.

Budget Change Request forms may be requested from the SWCAA grants manager at any time.

G. Non-Federal Match Requirement

ALL Title III funded projects must include matching funding from non-federal sources. These may be either cash or in-kind services, such as building space, utilities, personnel time, equipment, etc., that are not being used as a match for another federal program. In-kind services shall be valued using standard guidelines (available at www.independentsector.org/programs/research/volunteer_time.html). Community Development Block Grant funds are the only Federal funds that can be used as match. Project income such as third-party reimbursements, fees, etc., is allowable as non-federal match. Client contributions may not be included in non-federal match. (See pages 8-9 for explanation of required non-federal match percentages and declining funding formula.)

H. Client Contributions

Individuals who benefit from funded services shall be given the opportunity to contribute to all or part of the cost of the services provided. However, the method of solicitation must be non-coercive, means testing may not be utilized, and no older person shall be denied services because of his/her failure to contribute to all or part of the cost of such service. The amount of each

individual's contribution shall be kept confidential. Appropriate procedures must be in place to safeguard and account for all contributions. Client contributions may **not** be used as non-federal match. All collected contributions must be used to expand the service for which the contributions were given and to supplement (not supplant) Title III funds received.

I. Other Funding Requirements

1. Title III grant funds may not be used to replace current funding from other sources.
2. Providers must continue to seek other sources of funding for their project from private or other public sources. Gifts and other grants from foundations, corporations, etc., should be used to enhance the program and should be reported as non-federal match.
3. Costs incurred prior to the beginning of the award may not be included in program budgets or expenditure reports.
4. Administrative & General (A&G) costs may not exceed 20% of the total program budget.

J. Equipment Policies

SWCAA discourages the use of Title III funds for lease or purchase of equipment because of the extensive monitoring requirements. However, if equipment is leased or purchased with Title III monies, the following procedures must be followed:

1. Prior to the purchase of any non-consumable item valued at \$500 or more, the grantee must obtain three (3) written bids, which shall remain in the project file.
2. The grantee shall maintain an inventory of all equipment purchased with Title III funds or contributed as non-federal match.
3. Upon termination of the grant, such equipment may remain with the grantee providing the grantee assures that the continued use of the items will further the objectives of the Older Americans Act. In the absence of such assurance, the Agency on Aging may reclaim the equipment or its cash value.

VIII. DEFINITIONS

As defined by the Older Americans Act of 1965, as amended
or the State of Connecticut Cost Standards

1. "Administrative & General Costs (A&G)": Costs incurred for common or joint objectives and not readily identified with a particular program. Can include costs incurred for overall executive and administrative offices of the organization or other expenses of a general nature that do not relate solely to any specific program.
2. "At risk for institutional placement": with respect to an older individual, that such individual is unable to perform at least two (2) activities of daily living without substantial assistance (including verbal reminding, physical cuing, or supervision) and is determined by the state involved to be in need of placement in a long-term care facility.
3. "Child" (in reference to eligibility for Title III E, Grandparents Raising Grandchildren programs): an individual who is not more than 18 years of age or who is an individual with a disability.

4. "Focal point": a facility established to encourage the maximum collocation and coordination of services for older individuals.
5. "Grandparent or older individual who is a relative caregiver" (in reference to eligibility for Title III E, Grandparents Raising Grandchildren programs): a grandparent or step-grandparent of a child, or a relative of a child by blood, marriage, or adoption who is 55 years of age or older and
 - lives with the child;
 - is the primary caregiver of the child because the biological or adoptive parents are unable or unwilling to serve as the primary caregiver of the child; and
 - has a legal relationship to the child, such as legal custody or guardianship, or is raising the child informally.
6. "Greatest economic need": need resulting from an income level at or below the poverty line.
7. "Greatest social need": need caused by non-economic factors, which include physical and mental disabilities; language barriers; cultural, social, or geographical isolation, including isolation caused by racial or ethnic status—that restricts an individual's ability to perform normal daily tasks or threatens the capacity of the individual to live independently.
8. "Minority", as designated by the federal Office of Management and Budget, includes: Black/African American, Hispanic, Native American/Alaskan Native, Asian American, or Native Hawaiian/Pacific Islander.
9. "Multipurpose senior center": a community facility for the organization and provision of a broad spectrum of services, which shall include provision of health (including mental health), social, nutritional, and educational services and the provision of facilities for recreational activities for older individuals.
10. "Near poor": income at or below 150% of the federal Department of Health and Human Services Poverty Guidelines (including those in "poor" category).
11. "Older individual": an individual who is 60 years of age or older.
12. "Poor": income at or below 100% of the federal Department of Health and Human Services Poverty Guidelines.
13. "Severe disability": a severe, chronic disability attributable to mental or physical impairment or a combination of mental and physical impairments that are likely to continue indefinitely and result in substantial functional limitation in three (3) or more major life activities: self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, and economic self-sufficiency.
14. "State Unit on Aging": the State of Connecticut agency designated under section 305(a)(1) of the Older Americans Act.