

# POLICY AND PROCEDURE MANUAL TITLE III GRANTS

**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 the Agency on Aging 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](http://www.SWCAA.org).

### **D. SWCAA Funding Policy**

SWCAA has clear funding priorities that focus on serving older adults throughout its catchment area with particular attention given to low-income and minority individuals.

SWCAA's decision-making process is designed to:

- Fairly and consistently evaluate grantees;
- Emphasize meaningful outcomes;
- Include new program applicants; and

- Require competence from its grantees.

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 projects must address needs and priorities established in the Area Plan.
3. Projects will be funded contingent on available funding and the geographic distribution of elderly populations.
4. Projects 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. Services 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. **Access Services.** Helping seniors gain access to available services through information & assistance, outreach, transportation, and health (including behavioral health) services
2. **Legal Services**
3. **In-home Services.** Homemaker, home health aide, visiting and telephone reassurance, adult day care, chore, minor home modification, personal care services and other supportive services that assist older individuals in living 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
  - 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 [agingct.org](http://agingct.org) for details on the Title III C-Nutrition Services RFP.

#### Title III D—Disease Prevention & Health Promotion Services

All Title III D funded programs must replicate programs that meet the Administration on Aging's highest-level criteria for evidence-based programs. For current information about eligible evidence-based programs please go to <https://www.ncoa.org/professionals/health/center-for-healthy-aging/evidence-based-programs>

#### 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. Case management, assistance locating and accessing services;
3. Individual counseling;
4. Support group; and
5. Caregiver training.

#### Title III E—National Family Caregiver Support Program

Supportive services for family caregivers (aged 19 or older) 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. Case management, assistance locating and accessing caregiver services;
3. Individual counseling;

4. Support group; and
5. Caregiver training.

### **III. FUNDING REQUIREMENTS**

#### **A. Eligible Grantees and/or Contractors**

General subgrantee requirements:

1. Provide services within the AAA catchment area
2. 501(c)3 non-profit, or private not-for profit
3. Must be in good-standing with Secretary of State

#### **B. Funding Limitations**

1. The amount of available Title III funding depends on federal Older Americans Act funding determined by Congress and matching state funding approved by the Connecticut legislature each year. **Awards are contingent on the receipt of federal and state funding 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 one project is \$50,000, and no more than \$100,000 shall be awarded to any single applicant as identified by a Federal Employer Identification Number across all funding categories per fiscal year except under extraordinary circumstances. 20% of the total estimated funds available for awards in any one fiscal year shall be earmarked for new projects addressing a new solution to an identified need in the SWCAA Area Plan. If no new projects are approved for funding, the earmarked funds shall be awarded through the regular allocations process.
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 or virtual 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. 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 project, service, or activity. Grant funds are disbursed during the fiscal year based on project 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 reported.

#### **D. Non-Federal Match Requirement**

All Title III B and Title III E 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, go to [IndependentSector.org](http://IndependentSector.org) for the standard

value of volunteer time. 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 - must be at least 15% of the total project budget
2. Non-federal match for Title III D - 0%
3. Non-federal match for Title III E- must be at least 25% of the total project budget

This policy does not guarantee continued funding or funding at the level requested for any applicants. Projects will be funded contingent on available funding and on a favorable evaluation. However, projects will not be considered for funding if they do not meet the minimum match requirement.

#### E. Other Funding Requirements

1. Title III grant funds shall supplement, not supplant, federal, state or local funds; and may not be used to replace current funding from other sources.
2. Clients who are Medicaid or CHCPE eligible should not utilize Title III funds to receive Medicaid-eligible services.
3. 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 project and should be reported as non-federal match.
4. Costs incurred prior to the beginning of the award may not be included in project budgets or expenditure reports.
5. Indirect costs must be calculated by one of the following:
  - Federally negotiated indirect cost rate (must be documented);
  - De minimus rate of 10% of modified total direct costs; or
  - A negotiated rate based on actual costs included in project budget may be considered.
6. 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.
7. Payments are made by direct deposit (ACH), usually by the 1<sup>st</sup> of the month. Grantees will be required to provide necessary account and contact information to facilitate ACH payment.

## **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, participants with severe disabilities, older individuals at risk for institutional placement, participants with Alzheimer's and related disorders, 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 through [www.SWCAA.org](http://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 one of the lists of "Service Definitions". See [www.SWCAA.org](http://www.SWCAA.org)
5. Clients who are Medicaid or CHCPE eligible should not utilize Title III funds to receive Medicaid-eligible services.

#### B. Client Contributions

A copy of each funded organization's Client Contributions Procedure and the method by which it will be made known to individuals seeking or currently receiving services shall be on file at the SWCAA office. 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 SWCAA 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,"
2. include a statement that all older persons (60 or over) are eligible for services under the approved project, and
3. any reference to the funded project on the Provider's website shall include a URL link to [www.SWCAA.org](http://www.SWCAA.org).

#### 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 Client Grievance Procedure and the method by which it will be made known to individuals seeking or currently receiving services shall be 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 claims in SWCAA's online data portal (Grantee Gateway) and submit Form 5s for each new participant;
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;
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;
9. operate fully in conformance with all applicable Federal, State, and local fire, health, safety and sanitation and other standards prescribed in law and regulations. Where the State or local public jurisdiction requires licensure for the provision of services, agencies providing such services shall be licensed; and
10. submit all required Application Attachments as outlined in the RFP.

#### 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 Older Americans Act Title III Award.

#### G. Compliance

All programs funded by SWCAA must be in compliance with federal, state, and local laws, regulations, and licensed to perform the work they are seeking to provide. 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 from time to time
- 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
- Americans with Disabilities Act of 1990, as amended from time to time
- Federal Drug-Free Workplace Act of 1988, as amended from time to time
- Federal OMB Omni Circular
- Connecticut Public Act 07-1 concerning campaign contribution restrictions

#### 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 (one to be completed by the applicant agency as well as one 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 or March. 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.

The Request for Proposals, Application, Budget, and all supporting documents are posted at [www.SWCAA.org](http://www.SWCAA.org). Notification of this posting 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 [gjames@SWCAA.org](mailto:gjames@SWCAA.org);
2. Publication of legal notices in the area's public media; and
3. Posting on available social media sites.

### **B. Technical Assistance**

SWCAA will provide technical assistance sessions to all prospective applicants. Attendance may be required for any grant writer and or any person responsible for the application and budget preparation. Applicants should review the application package prior to attending the technical assistance session and should bring a copy of the application and budget with them to the session. Current requirements and details will be included in each Request for Proposals. Applicants may also contact the SWCAA grants manager at any time prior to the application due date with questions.

### **C. 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.**

The Application (in Word and signed in PDF format), Budget (in Excel) and required Application Attachments must be submitted electronically to [GJames@swcaa.org](mailto:GJames@swcaa.org).

Applicants must complete each section and sub-section of the application. Budgets must be complete and accurate and shall represent the entire cost of providing the requested services. No extraneous material will be accepted.

The contact person for technical assistance in completing the application is Gretchen James, at the SWCAA office 203-814-3620 or [GJames@swcaa.org](mailto:GJames@swcaa.org).

### **D. Proposal Review and Award Process**

SWCAA's decision-making process is designed to:

- Fairly and consistently evaluate grantees;
  - Emphasize meaningful outcomes;
  - Include new program applicants; and
  - Require competence from its grantees.
1. SWCAA staff will review application packages for completeness. SWCAA staff may contact the applicant for clarification, if necessary. Incomplete applications will not receive further consideration.
  2. Complete application packages 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. For new applicants and/or proposals for new programs, either a site visit or an interview with an allocations committee will be scheduled in May or June.
  4. The SWCAA Allocations Subcommittees will meet to discuss applications in late May or early June. Evaluation criteria will include:
    - Clients to be served, particularly low income and minority clients
    - Community need for service to be provided
    - Demonstrated quality of program
    - Cost effectiveness
    - Administrative competence
    - Past performance
  5. The Allocations Subcommittees make award recommendations. The Allocations Committee reviews all subcommittee recommendations and presents a final recommendation to the SWCAA Board of Directors.
  6. 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.
  7. Award letters are mailed to all applicants within ten (10) days of the Board decision.

#### E. 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 State Department on Aging, by submitting a written request to the Connecticut State Unit on Aging, 55 Farmington Avenue, 12<sup>th</sup> Floor, Hartford, CT 06105 and a copy to the SWCAA Executive Director within thirty (30) calendar days of receiving written notice from SWCAA. (Revised 11/2011) (Address updated 7/7/15)

## **VI. POST AWARD PROCEDURES**

### **A. Notification of Award**

1. After award 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 Older Americans Act Title III 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. Older Americans Act Title III Award Document. **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 Older Americans Act Title III Award Document 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 46<sup>th</sup> day and will so notify the applicant in writing.

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

1. Grievance Procedure;
2. Voluntary Contributions Procedure;
3. Certificate of Insurance: The Provider shall carry and maintain at all times during the term of the award, and during the time that any provisions survive the term of the award, sufficient general liability insurance to satisfy its obligations under this award. The Provider shall name the Southwestern Connecticut Agency on Aging as an additional insured on the policy and shall provide a copy of the Certificate of Insurance to the Agency on Aging prior to the effective date of the award. The Provider shall not begin performance until the delivery of the policy to the Agency on Aging. This section shall survive the termination, cancellation or expiration of the award, and shall not be limited by reason of any insurance coverage; and
4. ACH Direct Deposit Agreement Form. Grant payments are only made by ACH direct deposit.

#### C. Project Monitoring and Evaluation

SWCAA is responsible for the monitoring of Title III-funded projects. 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 claims in SWCAA's online data portal (Grantee Gateway);
3. on-site or virtual visits to agencies by SWCAA staff and members of SWCAA's Board and Advisory Council; 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.

#### D. 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.

#### E. 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 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 claims in Grantee Gateway; 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 Grantees to submit claims to the Agency on Aging:

1. By the 15th of each month, all claims must be finalized in SWCAA's online data portal (Grantee Gateway) for services provided during the previous month, and all client contributions must be entered in Grantee Gateway and;
2. FORM 5 Intakes for new clients must be submitted through the online data portal for services provided during the previous month in real time. It generally takes SWCAA 3 business days to process Form 5s Intakes before Grantees can add service units to those clients.

**Payment will be withheld for failure to submit any required reports by the scheduled due 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 state or federal single audit must include that report with the financial audit. If the audit includes any audit findings, a letter from management addressing how management is responding to the findings must also be submitted.

If your charitable nonprofit receives money from the federal government and expends more than \$750,000 of federal dollars in a single fiscal year, the organization is most likely required to have an independent financial audit referred to as a "Single Audit." A State Single Audit is required



when expenditures of state financial assistance equal or exceed \$300,000 in the auditee's fiscal year.

If an applicant does not have an audit SWCAA will accept Financial Statements from a Certified Public Accountant and an IRS Form 990.

#### D. Requirements for Payment

1. SWCAA payments to grantees are made based upon the availability of federal and state funds and review of grantees' financial and MIS reporting.
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 small grants.
3. Consistent errors with Form 5 Intakes and MIS submissions may effect an Agency's future funding prospects.

#### E. Payment Procedures

1. Monthly payments will be made to contract recipients based on approved claims in Grantee Gateway. If finalized claims and client contributions are not submitted by the 15<sup>th</sup> of the month, payments may be delayed until the following payment period.
2. Payments are made by direct deposit (ACH), usually on the 1<sup>st</sup> of each month. Grantees will be required to provide necessary account and contact information to facilitate ACH payment.

#### F. 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. "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.

2. "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.
3. "Cost Allocation Plan (CAP)": a plan that summarizes the methods and procedures an agency will use to allocate agency costs. The methodology must result in a reasonable and equitable distribution of expenses. A CAP plan is typically approved by the Board of Directors and reviewed annually.
4. "De minimus Indirect Cost Rate": an approved method of calculating indirect costs by utilizing 10% of modified total direct costs. If chosen, this methodology once elected must be used consistently for all Federal awards until such time as a non-Federal entity chooses to negotiate for a rate.
5. "Direct Allocable Costs": joint costs that are allocated directly to two or more programs activities. Direct allocable cost examples:
  - Costs that can be allocated in reasonable proportion to the benefits received
  - Must be allocated based on the documented methodology in the Cost Allocation Plan
  - A portion of a salary if the employee works on two or more projects
6. "Direct Costs": Costs that can be identified specifically with a particular cost objective, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Direct cost examples:
  - Purchase of art supplies for projects at a multifunction Senior Center
  - Program Coordinator who can be specifically identified with the project or entity
  - Insurance rider to cover volunteers specific to one home delivered meal program
  - The cost of rent **if** the space is only used for the proposed project or a portion of the rent can be calculated for the use of the proposed project
7. "Federally Negotiated Indirect Cost Rate": A rate utilized to calculate indirect costs based on documentation submitted to and approved by a Federal awarding agency.
8. "Fiscal Sponsorship": refers to a relationship in which one organization shares its tax exempt status with another. A fiscal sponsor for a prospective Title III project would need to be the applicant/grantee for Title III funds and would maintain fiduciary responsibility for the project. The agency providing the services would be treated as a subcontractor for Title III purposes. For additional information about fiscal sponsorship: <https://www.councilofnonprofits.org/tools-resources/fiscal-sponsorship-nonprofits>.
9. "Focal point": a facility established to encourage the maximum collocation and coordination of services for older individuals.
10. "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.
11. “Grant”: an agreement between two parties whereby financial assistance is provided to carry out a specific project, service, or activity. Grant funds are disbursed during the fiscal year based on program expenditures
  12. "Greatest economic need": need resulting from an income level at or below the federal Department of Health and Human Services Poverty Guidelines.
  13. "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.
  14. “Indirect Costs”: Costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Indirect costs must be calculated by one of the following:
    - Federally negotiated indirect cost rate (must be documented);
    - De minimus rate of 10% of modified total direct costs; or
    - A negotiated rate based on actual costs included in project budget may be considered.
  15. “In-Kind”: Donated resources that are available to the project by a third party; such as, building space, utilities, volunteer personnel time, donated equipment or supplies. In-kind personnel services shall be valued using standard guidelines. (See [www.independentsector.org/programs/research/volunteer\\_time.html](http://www.independentsector.org/programs/research/volunteer_time.html) for standard value of volunteer time.)
  16. "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.
  17. “MIS Service”: See Service Definitions
  - 18 “Modified Total Direct Costs”: The 10% de minimus indirect costs rate must be applied to the total direct costs modified by the removal of the following costs:
    - Subrecipient (subcontractor) expenditures exceeding 25K (for each subrecipient)
    - Capital expenditures
    - Charges for patient care
    - Rental costs
    - Tuition remission
    - Scholarships and fellowships
    - Participant support costs

19. "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.
- 20 "Near poor": income at or below 150% of the federal Department of Health and Human Services Poverty Guidelines (including those in "poor" category).
21. "Non-Federal Match": All Title III B and Title III E funded projects must include matching resources from non-federal sources. These may be either cash from other sources or in-kind services; such as, building space, utilities, personnel time, equipment, etc., which is not being used as a match for another federal program. Community Development Block Grant is the only federal funding source 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 as non-federal match. See pages 6 and 7 for additional details of match requirements.
22. "Older individual": an individual who is 60 years of age or older.
23. "Organization": the public, incorporated private 501(c)3 non-profit agency; municipality; or private, for profit company which will provide operational and fiduciary responsibility for a proposed project.
24. "Participant Support Costs": direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.
25. "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 reported.
26. "Poor": income at or below 100% of the federal Department of Health and Human Services Poverty Guidelines.
27. "Poverty Guidelines": See chart of Federal Poverty Guidelines as established by the U.S. Department of Health and Human Services. Services provided to clients at or below 100% of the poverty guidelines and those at or below 150% of the poverty guidelines will be tracked. "Low Income" guidelines used by other Federal programs do not apply to Title III funded programs.
28. "Project": relates to the proposed project or program for which funding is requested for the next fiscal year. The term "project" does not refer to an entire organization or to a current program or project.
29. "Service": See the separate lists of service definitions. These are the services that are eligible to receive Title III funding. Choose the service or services which best describe the service or services your project will provide. The service definition list also includes the unit of service

that must be reported monthly by client. If more than one service is to be provided, the budget must be costed out by service.

30. "Severe disability": a severe, chronic disability attributable to mental or physical impairment or a combination of mental and physical impairments that is 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.
31. "State Unit on Aging": the State of Connecticut agency designated under section 305(a)(1) of the Older Americans Act.
32. "Target Populations": Title III funded projects are required to provide services to target populations at least in proportion to their representation in the total elderly population. (Current census data is available at: [www.SWCAA.org](http://www.SWCAA.org).) Target populations include:
  - Elderly persons at or below 100% or 150% of the federal poverty guidelines.
  - Elderly minority persons as designated by the federal Office of Management and Budget: African American, Hispanic, Native American/Alaskan Native, Asian American, or Native Hawaiian/Pacific Islander.
  - Elderly persons who are both at/below 100% of the federal poverty guidelines and minority.
  - Elderly people living in rural areas: The towns in southwestern Connecticut that currently meet the federal definition of a rural area are Easton, Weston, and Wilton.
  - Elderly persons with limited English proficiency: for whom limited English proficiency results in language barriers and cultural, social, or geographical isolation, including isolation caused by racial or ethnic status, that: restricts the ability of the individual to perform normal daily tasks; or threatens the capacity of the individual to live independently.
  - Elderly persons with severe disabilities: a severe, chronic disability attributable to mental or physical impairment, or a combination of mental and physical impairments, that is likely to continue indefinitely and results in substantial functional limitation in 3 or more of the major life activities: self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, and economic self-sufficiency.
  - Elderly persons at risk of institutionalization: unable to perform at least 2 activities of daily living without substantial assistance (including verbal reminding, physical cuing, or supervision) and is determined by the State to be in need of placement in a long-term care facility.
  - Elderly people with Alzheimer's and related disorders
33. "Unduplicated Count of Clients": The total number of different clients who will receive service during a grant year. Any client who will receive more than one service during the grant year is counted only once for the unduplicated count.
34. "Unit of Service": The service definition list includes a required unit of service for each service. Monthly MIS reports on the number of units provided per client will be required.