

**BAYPATH ELDER SERVICES, INC.
AREA AGENCY ON AGING**

33 Boston Post Rd West
Marlborough, MA 01752

Tel 508-573-7200

Fax 508-573-7222

www.BayPath.org

**Older Americans Act
*TITLE III***

GRANTEE PROCEDURES MANUAL

Federal Fiscal Year – 2019

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I - INTRODUCTION

This Manual serves as a guide for BayPath Elder Services, Inc. Title III grantees as to the Area Agency on Aging (AAA) requirements for successfully carrying out Title III funded programs. The manual includes information to which grantees should refer in the course of the program year.

The Area Agency on Aging is required to:

- A. Assure that contracting agencies:
 - 1. make adequate progress toward meeting program goals and objectives and deliver the intended services;
 - 2. comply with all terms of the Notification of Grant Award (NGA) and Title III Memorandum of Agreement;
 - 3. account for expenditures of Title III monies; and

- B. Monitor the performance of grantees by:
 - 1. the systematic collection of data and other pertinent program and fiscal operations;
 - 2. the scheduling of assessment conferences with grantee staff at regular intervals;
 - 3. the on-site observation of operations.

II - MONTHLY REPORTS

Each grantee is required to submit a monthly Program Report and a monthly Fiscal Report to the Grants Manager at BayPath. These two reports must be submitted within fifteen (15) calendar days after the end of each reporting month. Failure to submit these reports in a timely manner may result in the delay of payment to the grantee.

(A) PROGRAM REPORTS

There are two types of monthly program reporting requirements. One is designed for “direct service grantees” (such as providers of transportation, mental health, legal and education services); the other is designed for “planning/capital improvement grantees” (such as funds awarded to senior centers and other non-profit organizations for architectural studies, renovations and equipment).

1. Direct Service Grantees

All grantees that have received funds for the provision of such services as transportation, mental health, legal, education, etc., are required to complete a monthly Program Report which has been designed by AAA staff and the grantee to reflect the unique characteristics of each program.

The information which is recorded on this form includes the unduplicated number of elders served; number of service units provided; breakdown of clients by certain characteristics, including minority, low income, and social need, and other aspects of program activity unique to that particular grantee. Several instructions for completing this report are provided in Attachment A.

A grantee may also be required to submit newsletters, minutes of Advisory Council meetings, brochures, etc., as well as back-up narrative information about its program operation (including written reports and schedules of outreach efforts, community education events and case examples) in an effort to keep AAA staff fully informed about program operations. AAA staff will advise each grantee of these additional requirements.

2. Planning/Capital Improvement Grantees

All grantees that have received funds for program planning, program development and/or "capital improvement (such as renovations) are required to submit a monthly narrative of program activity to the AAA staff. The information to be submitted should include a description of the progress made toward meeting the proposed objectives, a description of and explanation for alterations made in the program operation and a report of alternative funding sources expended and/or secured for the continuation of the project (if applicable).

A grantee who falls into this category may also be required to submit additional material relevant to its program operation including copies of press releases, copies of architectural bids and meeting minutes in an effort to keep AAA staff thoroughly informed. AAA staff will advise each grantee of these additional requirements.

(B) FISCAL REPORTS

Each grantee is required to submit a monthly Fiscal Report to the Grants Manager within fifteen (15) calendar days after the end of each reporting month. The fiscal report serves as a monthly cash request form. The information requested on this report corresponds to the Notification of Grant Award (NGA). Staff time sheets, purchase orders and/or bills for expenditures may be requested for submission with these reports. AAA staff will advise each grantee of any additional requirements. Failure to submit Fiscal Reports in a timely and accurate manner may result in the delay of receipt of Title III funds.

Federal regulations require that “each service provider must provide each older person with an opportunity to contribute voluntarily to the cost of the service.” This must be done in a confidential manner, and procedures for accounting for all contributions must be in place. The amount raised is included in the Fiscal Report and can be used only to provide additional services as originally funded.

Language should also indicate that contributing or failing to contribute in no way informs or influences service delivery. A sample report, instructions for completing the report and a description of BayPath’s fiscal procedures are provided in Attachments B, C and D.

NOTE:

In the event that the grantee has had no program activity or Title III expenditure, the grantee may inform the grantor via email or monthly report that indicates the reason for lack of activity in the project/grant. If In-kind resources were expended a Fiscal Report must be submitted indicating such and that no Title III expenditures were made and the year-to-date totals remain the same.

III - GRANTEE ASSESSMENT MONITORING

Each grantee is required to participate in a Monitoring Visit, scheduled in advance by the Grants Manager with the Project Director of each Title III funded program. **The onsite monitoring visit will be held during the first 6-8 months of the grant period.** Grantee staff members who are associated with the project, in addition to the Director, may be requested to attend these conferences.

The purpose of the monitoring visit is to:

- A. Review the program’s past and current program and fiscal activities;
- B. Discuss the program’s planned activities for the current year;
- C. Make any needed revisions in the original Request for Proposal; objectives and designated funding levels; and
- D. Assist the grantee in any aspect of program operation including publicity, outreach techniques, alternative funding possibilities, etc.

IV - CLIENT SATISFACTION SURVEYS

Client satisfaction surveys must be completed by all grantees for their programs utilizing Title III funds. The final format of the survey is left up to each grantee; however, grantees may submit the survey to AAA staff for review, prior to implementation. The survey should be completed by participants, anonymously.

At a minimum, the survey should cover the following:

- A. Was the client satisfied with the service/program?
- B. What problems, if any, clients encountered with the service/program;
- C. What suggestions clients have for improving the service/program; and
- D. Whether clients would utilize the service/program again if the need should arise.

V - CORRECTIVE ACTION PROCEDURES

Any grantee who, for any cause, fails to perform any of the items specified in this manual and/or any of the terms specified in the Memorandum of Agreement in a timely and proper manner is subject to termination or suspension by BayPath Elder Services, Inc.

The procedures which BayPath follows, and the requirements for grantees, in such instances are specified in Section M of the Memorandum of Agreement. The appeals and hearing process and procedures are specified in Attachment E.

VI - MINORITY PROGRAMMING

New requirements of the Older Americans Act Amendment of 2000 Sec 306 (a)(4)(ii) obligate providers receiving Title III funds to the following:

- A. Specify how the provider intends to satisfy the service needs of low-income Minority individuals in the area serviced by the provider; and
- B. Attempt to provide services to low-income minority individuals in at least the same proportion as the population of low-income individuals bears to the population of older individuals of the area served by such provider.

VII - AGE REQUIREMENTS

Each grantee/contractor must have a procedure to ensure that all participants in Title III programs are sixty (60) years of age or older.

VIII - INSTRUCTIONS FOR COMPLETING MONTHLY PROGRAM REPORTS

Program Reports are submitted to BayPath by all grantees on a monthly basis. They should be received by the Grants Manager no later than fifteen (15) calendar days after the close of a reporting month.

The reports have several functions. They are a tool both for the grantee and BayPath to monitor the progress of the grant program. They record statistical information regarding the numbers of people using the service and characteristics of participants which BayPath, in turn, is required to report to the Massachusetts Executive Office of Elder Affairs. (EOEA). The reports enable each grantee to indicate ways in which BayPath can offer technical assistance to each project, and they serve as a means of transmitting important information that the AAA can pass along to others in the aging network. Since the Program Report is designed specifically for each grantee, specific questions regarding the completion of the report should be referred to the Grants Manager. Important information applicable to all grantees to aid in the completion of the Program Report is as follows:

1. **Unduplicated Count** - Refers to the number of different individuals served or participating in each program. Note that only those participants who are age 60 or over and who reside in the BayPath service area should be recorded. If families of elders (in aging -related issues) are also served, include these figures but please indicate the distinction.
2. **Duplicated Count** - Refers to the number which represents the total number of times each person is provided a service.
3. **Unit of Service** - Refer to the individual grant application for Title III funds.
4. **Social Need** - Refers to those people whose ability to perform normal daily tasks and whose ability to live independently is threatened by non-economic factors. These factors include physical or mental disorders, language barriers and cultural and social isolation, including that caused by racial or ethnic status.
5. **Economic Need** – Federal Register uses the poverty level figure of \$12,060 peryear for one person living alone and \$16,240 for a two-person household to determine the number of clients of economic need being served by Title III programs. Please note that income tests of Title III programs are not allowed, so this needs to be a best estimate.
6. **Minority** - Refers to persons participating in a program who are African American, American Indian, Alaska native, Hispanic, or Asian.
7. **Homebound** - Self-explanatory.
8. **Institutionalized** - Self-explanatory.

FISCAL PROCEDURES

1. Funding procedures

BayPath will reimburse the grantee for monthly expenditures which are listed on the monthly Fiscal Report. Only allowable costs will be reimbursed based on the grantee's approved Title III budget. Grantees will be reimbursed only for the exact expenditure amounts.

All grant awards are subject to change due to possible delays or changes in federal funds channeled to BayPath through EOE.

2. Maintenance of Records

Separate accounting records for receipts and disbursements must be established for all federal project funds received from BayPath and all non-federal resources (cash or in-kind) contributed by the grantee. Project accounting records shall be itemized in sufficient detail to show the exact nature of all receipts and disbursements. Supporting documents shall be filed in such a way that they can be readily located. These may include personnel time sheets, mileage records, invoices from supplies purchased, a record of project income raised (donations), etc.

3. Budget Modification

The grantee may request a transfer of funds between budget line items by writing to the AAA. The request should indicate the particular line items affected and the rationale for the requested change. The AAA must submit a written approval of the change to the grantee before the transfer can be made. Requests may be submitted at any time up to sixty (60) days before the end of the project year.

Revisions of a large portion of the budget may require the signing of a new NGA.

No grantee may exceed its total Title III award.

4. Internal Fiscal Controls.

The following checklist should be utilized by the grantee as a guideline for insuring minimal fiscal controls and procedures. These guidelines are not meant to be all inclusive. However, they can be applied in many situations in determining the grantee's ability to accurately and efficiently manage the funds awarded:

1. Does the grantee account separately for funds received, based on funding source?
2. Are expenses adequately recorded and segregated by funding source/program?
3. Are books of original entry (e.g. chase receipts, disbursement) kept current?
4. Are bank statements reconciled and canceled checks retained for three years?
5. Is the property ledger maintained so that any item of property can be located and identified?
6. For grantees with small budgets, are certain functions, such as receiving bank statements, preparation of bank reconciliations, etc., carried out by independent bookkeepers or others for internal control purposes?
7. For grantees operating with small budgets, is the financial system so designed, at the minimum, that no one person has access to all financial operations, records and procedures?

X - TITLE III APPEALS PROCEDURE ADMINISTRATIVE REVIEW PROCESS

1. Purpose and Scope

The purpose of the Local Administrative Review is to provide all parties an opportunity to resolve any grievance that may have arisen in the administration of the Title III statutory programs. The review procedure shall be an informal hearing to review facts and achieve an amicable settlement.

2. Definitions

The definitions as listed in the Department of Elder Affairs "Adjudicatory Rule of Practice and Procedures in Claims Relating to Contracts and Grants Funded by Title III, IM-82-03, shall apply.

3. Notice

An Applicant or Provider shall receive written notice from the Area Agency that its application to provide service has been substantially denied or that its contract to provide services has been terminated or not renewed with ten (10) days after the decision by the Area Agency. The notice shall be delivered or forwarded by registered or certified mail, and specify the reason or reasons for the adverse action as well as notification that the Applicant or Provider has thirty (30) Days from the receipt of the notice to request a hearing by the Department.

4. Request for a Meeting

The notice of appeal must be delivered or mailed, registered or certified mail, to the Hearing Officer of DEA within thirty (30) days of the written notification to the Applicant or Provider of the adverse action by the Area Agency on Aging, and a copy of the request must be mailed simultaneously by the Applicant or Provider to the Area Agency on Aging.

5. Grounds for Appeal

A request for an appeal may be based on any one or more of the following grounds:

- a. Denial by an Area Agency in whole or in substantial part of an application for funding, where there is reason to claim such denial is arbitrary, capricious, biased, or not based upon substantial evidence.
- b. Any action on the part of the Area Agency concerning non-renewal or termination of a grant or contract, where there is reason to claim such actions are arbitrary, capricious, biased or not based upon substantial evidence.

6. Composition of the Review Panel

The Administrative Review Panel will consist of three members:

- a. Member of the Board of Directors
- b. Member of the Advisory Council
- c. Disinterest party residing in the PSA

One alternate for each of the three categories will also be appointed to the Panel. The members of the Administrative Review Panel shall be appointed by the President of the Board of Directors. A non-voting recorder will attend all meetings of the Panel.

7. Time Schedule

A review will be scheduled within ten (10) days after receipt of a request for a meeting. The parties will be notified by mail of the time, date and location of the meeting. The decision of the Review Panel will be made within ten (10) days following the date of the review meeting.

8. Rights of the Parties at the Review Meeting

The parties to a review shall have the right to a full and fair review. Accordingly, any party to the review shall be entitled to present oral and documentary evidence.

9. Conduct of the Review Meeting

A chairperson of the Review Panel shall preside at the review meeting and shall make all Decisions as to the procedure of the meeting. It shall be the responsibility of the Review Panel to keep minutes and records of the proceedings of the meeting. All oral and written evidence shall be pertinent, relevant and material to the proceedings.

10. Default

In the event a Party shall fail to appear at a review, the Panel shall notify said Party in writing that a default will be entered against such Party. The defaulting Party shall then have five (5) days in which to seek a new review date. A new review date shall be granted only for the good cause shown. If the Review Panel determines a good cause has not been shown, or if the five days expire without response, a default shall be entered as to the defaulting party, and a decision may be rendered based upon the evidence available, or the case may be dismissed.

11. Withdrawal

An appellant may file a written request to withdraw a claim of appeal at any time and shall not thereafter be permitted to resubmit a claim based upon the same facts.

12. Decision

The decision of the Review Panel will be in writing and forwarded to the appellant with a copy to the DEA Hearing Officer within ten (10) days of the date of the review.

Note: The "Adjudicatory Rule of Practice and Procedures in Claims Relation to Contracts and Grants Funded By the Title III" (IM-82-03) are incorporated in, and made a part of, the Local Administrative Review Process wherever applicable.