

# **DLWD Program 5 – Older Individuals Who are Blind**

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## **I. PROGRAM OBJECTIVES**

The Independent Living Services for Older Individuals Who Are Blind (OIB) Program (ALN 84.177B) is a federally funded program under 34 CFR Part 367 that provides Independent Living (IL) services to older individuals who are blind or visually impaired. These services may include traditional IL services, low vision assessments, low vision aides and all activities that will improve or expand services for those individuals. The grantees will also provide community activities which will assist in improving public understanding of the challenges of these individuals.

The following regulations apply to the Independent Living Services for Older Individuals Who Are Blind program:

The Education Department General Administrative Regulations (EDGAR) as follows:

- a) 34 CFR part 75 (Direct Grant Programs), with respect to grants under subpart B and D.
- b) 34 CFR part 76 (State-Administered Programs), with respect to grants under subpart E.
- c) 34 CFR part 77 (Definitions That Apply to Department Regulations).
- d) 34 CFR part 79 (Intergovernmental Review of Department of Education Programs and Activities).
- e) 34 CFR part 81 (General Education Provisions Act—Enforcement).
- f) 34 CFR part 82 (New Restrictions on Lobbying).
- g) 2 CFR part 180 (OMB Guidelines to Agencies on Debarment and Suspension (Nonprocurement)), as adopted at 2 CFR part 3485.
- h) 2 CFR part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as adopted at 2 CFR part 3474.

## **II. PROGRAM PROCEDURES**

To allot program funds for use in Alaska, the Department of Labor and Workforce Development (DOLWD) Division of Vocational Rehabilitation (DVR) awards, administers, and manages the day-to-day operations of grant and contract supported activities. Awarding grants and contracts to diligent agencies and monitoring their performance is necessary to ensure that funds are used for allowable costs in accordance with Federal requirements.

## **III. COMPLIANCE REQUIREMENTS**

### **A. Activities Allowed or Unallowed**

1. All costs must be allowable. To be considered an allowable cost, the cost must:
  - a) Be for a preapproved service or expense that's described and included in the contract.
  - b) Be reasonable for the performance of the award and be allocable under the principles contained in 2 CFR part 200.

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- c) Conform to any limitations or exclusions set forth in these principles or in the award as to types or amount of cost items.
- d) Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the organization.
- e) Be given consistent treatment.
- f) Be determined in accordance with generally accepted accounting principles (GAAP).
- g) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period.
- h) Be adequately documented.

Funds awarded under this part include the following activities:  
IL services for older individuals who are blind to include—

- a) Services to help correct blindness, such as:
  - i. Outreach services;
  - ii. Visual screening;
  - iii. Surgical or therapeutic treatment to prevent, correct, or modify disabling eye conditions; and
  - iv. Hospitalization related to these services;
- b) The provision of eyeglasses and other visual aids;
- c) The provision of services and equipment to assist an older individual who is blind to become more mobile and more self-sufficient;
- d) Mobility training, Braille instruction, and other services and equipment to help an older individual who is blind adjust to blindness;
- e) Guide services, reader services, and transportation;
- f) Any other appropriate service designed to assist an older individual who is blind in coping with daily living activities, including supportive services and rehabilitation teaching services;
- g) IL skills training, information and referral services, peer counseling, individual advocacy training, facilitating the transition from nursing homes and other institutions to home and community-based residences with the requisite supports and services, and providing assistance to older individuals who are blind who are at risk of entering institutions so that the individuals may remain in the community; and
- h) Other IL services, as defined in 34 CFR § 367.5.

A sample of costs that are not allowable include costs incurred for lobbying or related purposes, to cover over-expenditures from other federal or state contracts, alcoholic beverages, donations, fines, and entertainment purposes.

2. All costs must be allocable to a contract. To be considered an allocable cost, the cost must be:

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Treated consistently with other costs incurred for the same purpose in like circumstances and:

- a) Be incurred specifically for the award.
- b) Benefit both the award and other work and be distributed in reasonable proportion to the benefits received, or
- c) Be necessary to the overall operation of the organization, although a direct relationship to any particular cost objective is not shown.

### **Suggested Audit Procedures:**

- a) Test transactions to determine whether expenditures are necessary and reasonable for the performance and administration of the program, and are authorized or not prohibited under applicable guidelines and regulations;
- b) Test transactions for accuracy and support; and
- c) Verify that overall combined direct and related indirect administrative costs do not exceed the total amount allowable under terms of the grant.

### **B. Eligibility**

In this legislation, the term "older individual who is blind" means "an individual age 55 or older whose significant visual impairment makes competitive employment extremely difficult to attain but for whom independent living goals are feasible."

There are two criteria that make an individual eligible for OIB services.

- 1. The individual must be 55 years of age or older.
- 2. The individual must have a severe vision impairment.

While age is a straightforward measure, severe vision impairment is not as easily defined. It is up to each Designated State Agency (DSA) to determine the definition of severe vision impairment. Some programs go by the self-report of the individual applying for services, while other programs require the person to be legally blind, as indicated on an eye report. As the DSA, DVR, for the purpose of this grant, defines severe vision impairment as self-reported.

### **Suggested Audit Procedures:**

- a) Review selected participant files for documentation of eligibility criteria.

### **C. Matching, Level of Effort, Earmarking**

The grantee must contribute matching, in cash or in-kind, of not less than 10 percent of the total cost of the project.

### **Suggested Audit Procedures:**

- a) Review the grant award notification for program matching requirement, and verify through accounting records that the matching requirement was met.

### **D. Reporting Requirements**

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Reporting will be conducted throughout the entire grant/contract cycle which generally runs concurrent with the state fiscal year. At a minimum, monitoring will consist of a thorough review of the following documents submitted by the grantee/contractor:

- Quarterly fiscal and statistical reports
- Narrative reports on progress made in achieving goals
- All invoices submitted for payment
- Annual audit reports
- Data required to complete federal reports
- Final expenditure reconciliation report
- Desk audits

At the end of each fiscal year, the DSA will prepare and submit to the Secretary a report, with respect to each project or program the DSA operates or administers under this part, whether directly or through a grant or contract, that contains information that the Secretary determines necessary for the proper and efficient administration of this program, including—

- a) The number and demographics of older individuals who are blind, including older individuals who are blind from minority backgrounds, and are receiving services;
- b) The types of services provided and the number of older individuals who are blind and are receiving each type of service;
- c) The sources and amounts of funding for the operation of each project or program;
- d) The amounts and percentages of resources committed to each type of service provided;
- e) Data on actions taken to employ, and advance in employment, qualified—
  - i. Individuals with significant disabilities; and
  - ii. Older individuals with significant disabilities who are blind;
- f) A comparison, if appropriate, of prior year activities with the activities of the most recent year; and
- g) Any new methods and approaches relating to IL services for older individuals who are blind that are developed by projects funded under this part;

The DSA will submit annual financial expenditure federal reports to The U.S. Department of Education through <https://rsa.ed.gov>.

### **Suggested Audit Procedures:**

- a) Review the procedures for preparing reports and evaluate adequacy;
- b) Review a sampling of reports for completeness and timeliness of submission;
- c) Trace data in selected reports to the supporting documentation; and
- d) Evaluate adjustments, if any, for propriety.

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### **E. Equipment – N/A**

### **F. Special Tests and Provisions**

Abides with Department of Labor & Workforce Development Laws

- a) Occupational Health and Safety
- b) Workers' Compensation
- c) Unemployment Insurance
- d) Wage and Hour

### **Suggested Audit Procedures:**

- a) Verify grantees are in good standing with the above DOL&WD Divisions.