

# **DOH PROGRAM 16 –SENIOR AND DISABILITIES SERVICES COMMUNITY BASED GRANTS – TITLE III PROGRAMS**

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## **I. PROGRAM OBJECTIVES**

The Senior and Disabilities Services Community Based Services Grant component was created in FY2019 in order to streamline and combine three budget components into one. The SDS Community Based Services budget component includes grant programs funded through Federal Title III Older American's Act funds, State General Funds, Mental Health Trust Funds, Federal Part B Independent Living funds, and Medicaid Administrative Funds. This compliance supplement is relevant for grant programs funded through Older America's Act, Title III B, C1, C2, D and E sources and include the Nutrition, Transportation and Support Services program, National Family Caregiver Support Program, and Health Promotion / Disease Prevention Program. These programs have two associated provider agreements: the Senior Meals through Schools and Nutrition Supplemental Incentive Payment programs. All of these programs are intended for individuals 60 and over and are guided by requirements listed in Title III sections B, C1, C2, D, and E of the Older American's Act.

## **II. PROGRAM PROCEDURES**

Funding for the Title III grant programs are distributed through a competitive grant process and is administered by the Division of Senior and Disabilities Services (DSDS). Programs are developed target specific needs of seniors with greatest physical, economic, and social needs. Individuals who receive services under the Home and Community-Based Medicaid waiver program are not eligible for grant funded services that are Medicaid reimbursable. Title III grants services to assist physically frail or disabled seniors and their caregivers so that they can remain at home for as long as possible, delaying or avoiding institutional care. These programs provide a variety of services that include information and assistance, congregate and home delivered meals, transportation, homemaker, support services such as education and training for unpaid family caregivers and grandparents raising grandchildren, legal assistance, and health promotion activates and socialization opportunities.

## **III. COMPLIANCE REQUIREMENTS AND SUGGESTED AUDIT PROCEDURES**

### **A. TYPES OF SERVICES ALLOWED OR UNALLOWED -**

**Compliance Requirements:** Title III of the Older Americans Act (OAA), Program, Nutrition Services Incentive Program, DHSS grant regulations 7AAC 78.

- **National Family Caregiver Support Program** provides support to caregivers of adults 60 and over and to grandparents 55 and over raising grandchildren under 18. Support services include information, assistance, counseling, support groups, training, respite and supplemental services.

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- **Nutrition, Transportation and Support Services (NTS)** provides meals, transportation, homemaker and other supportive services to seniors 60 and over who need assistance to remain independent in their homes and communities. Services are targeted to seniors who are socially isolated, low income, need assistance with two or more activities of daily living, are non-English speaking, or who live in a rural or remote area.
- **Health Promotion and Disease Prevention (HP/DP)** Evidence based programs that improve health outcomes to seniors in a group setting.

**Suggested Audit Procedures:** Perform audit procedures to verify compliance with applicable federal and state guidelines.

- a) A copy of the most recent Request for Proposal;
- b) Final grant award including all conditions;
- c) Grant revisions and related transmittal letters.

## **B. ELIGIBILITY -**

**Compliance Requirement:** Are those which apply to the federal programs for Title III of the Older Americans Act (OAA), Nutrition Services Incentive Program.

**Suggested Audit Procedures:** Perform audit procedures to verify compliance with applicable federal guidelines.

## **C. MATCHING, LEVEL OF EFFORT AND/OR EARMARKING REQUIREMENTS -**

**Compliance Requirement:** All Title III Grant programs must provide required match as described in the grant award. Local match must be comprised of cash or in-kind items necessary to provide the services of the grant. In-kind match items must be items for which DSDS grant dollars could be used if they were available. For Title III programs, program income and client fees for service may be used to meet match.

**Suggested Audit Procedures:**

- a) Review final grant award to identify the required level of local match;
- b) Review the agency's accounting records to determine whether local match has been contributed to the project according to the terms and conditions of the grant.

## **D. REPORTING REQUIREMENTS -**

1. **Compliance Requirement:** Quarterly fiscal and statistical reports are required within thirty days (30) following the end of each quarter.

**Suggested Audit Procedures:**

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

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2. **Compliance Requirement:** The agency's audit report must present a statement of revenue and expenses, budget and actual, for each state grant. Such statements must show, for each state fiscal year grant, the final approved budget by line item category, actual revenues and expenditures and variance between budgeted and actual revenues and expenditures. Disallowed or questioned costs must be clearly disclosed.

**Suggested Audit Procedures:**

- a) Review grant regulation 7 AAC 78.230;
- b) Review audit report for compliance with the above.

3. **Compliance Requirement:** The agency must clearly show on their audit report any outstanding liability to the State as payable to the State. This includes unspent grant funds and disallowed costs.

**Suggested Audit Procedures:**

- a) Determine whether the agency has any outstanding liability to the State;
- b) Review grant regulation 7 AAC 78.230;
- c) Review audit report to ensure proper presentation.

### E. SPECIAL TESTS AND PROVISIONS -

1. **Compliance Requirement:** Each employee of an agency providing publicly funded home care services under this program (care coordination, chore, respite, adult day services, personal care, home health, and similar services), including volunteer staff and Senior Employment Program participants, must have a criminal background check done by the Department of Public Safety, pursuant to AS 12.62.035. Each grantee must adhere to this statute and pursuant regulations.

**Suggested Audit Procedures:** Review to verify that each employee performing home care services has had a criminal background check on record.

2. **Compliance Requirement:** The agency must act upon any recommendations made by program site review.

**Suggested Audit Procedures:**

- a) Obtain copy of program site review; and
- b) Determine if recommendations in the site review are being implemented.