



## Lieutenant Governor's Office on Aging State Waiver Form Waiver: W-001

By signing the Lieutenant Governor's Office on Aging's (LGOA's) State Waiver Form, the  
Catawba

Planning and Service Area

has determined that there is a need within its planning and service area to waive an existing LGOA policy and procedure to better serve the needs of its region.

Older Americans Act (OAA) Section 305(a)(1)(C) authorizes the LGOA to set policies to deliver aging services in South Carolina and states that the LGOA "be primarily responsible for the planning, policy development, administration, coordination, priority setting, and evaluation of all State activities related to the objectives of this Act." The OAA and the South Carolina Code of Laws are the foundation of the aging service delivery system across the State.

In accordance with the OAA, the LGOA has established written policies and procedures to administer aging services and programs in South Carolina. The procedural protocols set by the LGOA to deliver aging services are based on Federal and State Law. However, the LGOA acknowledges that the Planning and Service Area (PSA) could determine that there may be an extenuating circumstance regionally which results in a PSA generating a waiver.

State Waivers, which allow the PSA to operate outside the written policies and procedures of the LGOA, will not be accepted if it is determined that the waiver conflicts with the OAA or South Carolina law. A State Waiver is for up to a one-year period, terminating on June 30<sup>th</sup>. The LGOA reserves the right to invalidate waivers that amend its policies and procedures at any time.

The PSA and its Executive Director assume all legal responsibility and liability for the procedural and operational practices associated with this waiver, and will be held accountable for any consequences that might result from this waiver being enacted. The multiple parties associated with the State Waiver are required to follow all established LGOA policies and procedures for data collection in order to accurately track and record client data. The PSA will be responsible for fulfilling all other areas of LGOA policies and procedures operations not covered by this waiver.

**The LGOA will not reimburse the PSA for unearned funding:** Performance outcome requirements set through contractual agreements in the planning and service area are the legal responsibility of the PSA. The PSA is responsible for ensuring that its service providers/contractors earn their funding in accordance to the OAA and LGOA policies and procedures. If it is determined that funding is not being earned, or that data is not being accurately tracked, the PSA will be expected to execute a thorough review of the service provider's/contractor's operations which could result in a thirty (30) day Corrective Action Plan to bring the multiple parties into OAA and LGOA compliance.

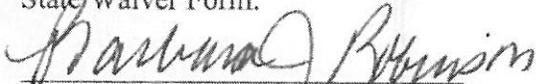
PSA Requesting Waiver:	Catawba PSA	
Type of Waiver Requested	Waiver of frequency of data entry.	
Date the Waiver is Requested to cover:	July 1, 2013 - June 30, 2014	
Is this a waiver consideration on behalf of the PSA or the Provider/Contractor?	Contractor	
Name of Provider/Contractor Director if appropriate:	York County Council on Aging- Wendy Duda, Executive Director	
Name of site for waiver consideration if appropriate:	York and Chester County Senior Centers and Nutrition sites	
Provider/Contractor contact information if appropriate:	Wendy Duda (803) 327-6694 or wduda@ycco.com	
What type of waiver is being requested? Please specify what action plans and protocol steps the PSA has taken to assist the Service/Provider Contractor to comply with the requirements of the OAA, AoA and LGOA and the duration of the assistance given.		
<b>LGOA Policy &amp; Procedure Manual Effective July 1, 2013. Chapter 500 Service Eligibility Checklist- A. Nutrition Service Data Input: "All AAAs/ADRCs and Nutrition Service providers/contractors shall accurately input required client data into the Advanced Information Manager (AIM) client data collection system within one (1) week of the meal being served and as requested by the terms, conditions, policies, procedures, and specifications of Title III-C of the OAA."</b>		
Please state what specific challenges the PSA and Service Provider/Contractor encountered and why they were unable to successfully perform the requirements of the PSA, AoA, OAA and LGOA which necessitated the need for this waiver.		
Challenges		Reason Unable Perform the Requirement
<b>Current staff capacity will not allow for weekly data entry without additional costs.</b>		<b>Funding unavailable to hire additional staff for additional weekly data entry.</b>
What do you anticipate the positive results or benefits of the waiver will be if granted?		
<b>Greater efficiency in processing and data entry.</b>		
What do you anticipate the negative consequences of not granting the waiver will be?		
<b>We do not anticipate any negative consequences.</b>		
How will you determine if this waiver will lead to service or programmatic improvements?	<b>Process for data entry will be evaluated each month to ensure that data is entered in a timely manner for processing of requests for payments.</b>	
What steps will the PSA take to ensure that the Provider/Contractor adheres to the contracts signed with the PSA to provide services, functions, and activities required for OAA and LGOA funding, in addition to this waiver?		

Catawba PSA will monitor services, functions and activities required for OAA and LGOA funding.

Additional comments or information needed to support waiver request:

See attachment from York County Council on Aging

By signing this document, I certify that the waiver will be implemented as described above in this State Waiver Form.

  
Planning Service Area Director

7-1-2013  
Date

  
Tony Kester  
Lieutenant Governor's Office on Aging Director

Approved

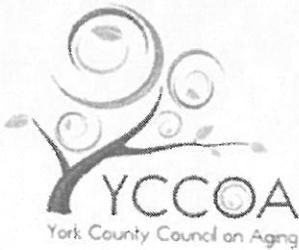
Not Approved

7-10-13  
Date

**The waiver form should be sent to:**

Gerry Dickinson, Policy Manager  
Lieutenant Governor's Office on Aging  
1301 Gervais Street, Suite 350  
Columbia, South Carolina 29201

**All Approved State Waivers will be listed on the LGOA website, per Section 210 of the South Carolina Aging Network's Policies and Procedures Manual regarding State Waivers.**



JUL 1 2013

June 26, 2013

Ms. Barbara Robinson, Director  
Catawba Area Agency on Aging  
P.O. Box 4618  
Rock Hill, SC 29732

Dear Ms. Robinson,

York County Council on Aging would like to request a waiver from the following regulation in the Lt. Governor's Office on Aging, South Carolina Aging Networks Policies and Procedures Manual, dated July 1, 2013 Chapter 500, Page 20, Section 503: Title III-C Nutrition Service Operation, Service Eligibility Checklist: Section A Nutrition Service Date Input:

All AAAs/ADRCs and Nutrition Service providers/contractors shall accurately input required client data into the Advanced Information Manager (AIM) client data collection system within one (1) week of the meal being served and as requested by the terms, conditions, policies, procedures and specifications of the Title III-C of the OAA.

Reason for waiver request:

This data is currently entered into the AIM client data collection system on a monthly basis. Entering the same data on a weekly basis will require 4-5 times the amount of data entry time per month. Currently it takes 8 hours per month to enter the data. Since entering five units per client weekly will require the same amount of hours as entering 20 units monthly, it will require between 24 and 32 additional hours per month, depending on the number of weeks per month. Based on hourly rates alone, this will be between \$312 and \$416 additional cost for data entry alone. This is, of course, not included in our budget or unit cost projection.

Each week we will have to allot additional time for site managers to do paperwork. Since we check sign in sheets against the logs, each site manager from our outlying 6 sites will have to have extra time to bring logs and sign in sheets to the Rock Hill office. These two items will add a minimum of one hour, a maximum of two, per week to bring total hours between 28.5 and 30.5. This, plus the added requirement of two assessments per year for home delivered meal recipients which requires extra hours, all of our site managers salaries will increase to require us to cover them with insurance beginning January, 2014. The insurance and additional hours are both not currently budgeted.

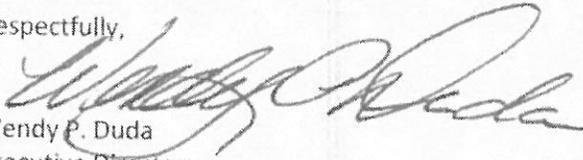
Additional mileage three to four times per month for the site managers to bring in reports will be 217 miles per week, \$.40 per mile or \$86.80 per week, \$260.40-\$347.20 additional per month. Also, this is not budgeted.

Justification:

The waiver is being requested because none of the above items will improve the quality of the services that we provide, nor will it give you any more information on the number of units per client that we provide. The only thing it will do is raise the cost of a unit of service and lower the number of units that we can provide. The only thing affected is the senior waiting for service.

Perhaps it is the intent of the Lt. Governor's Office to reimburse us on a weekly basis, but that does not appear to be the case from what I read in the manual. We are fine with our monthly reimbursement. I believe we have demonstrated to your office that we keep very good, accurate records that reflect the units that we provide to each client. Therefore we ask that you grant us a waiver from this regulation for both York and Chester Counties to allow us to spend our allocations on serving the elderly and not on the administrative record keeping for the program.

Respectfully,

A handwritten signature in black ink, appearing to read "Wendy P. Duda", written in a cursive style.

Wendy P. Duda  
Executive Director