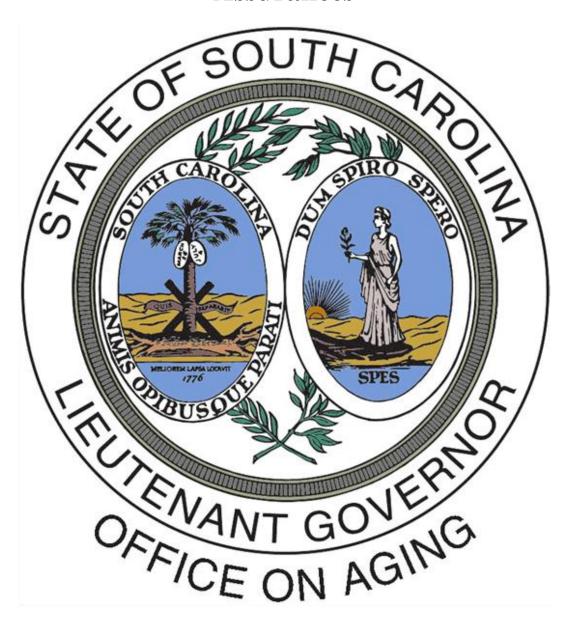
# Lieutenant Governor's Office on Aging 2014 – 2017 Comprehensive PSA and AAA/ADRC Area Plan Instructions Guide and Assurances





## 2014 – 2017 LGOA Comprehensive PSA and AAA/ADRC Area Plan Instructions Guide and Assurances

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## **Section One**

# Overview of the 2014 – 2017 Area Plan

#### 1. OVERVIEW OF THE 2014 – 2017 AREA PLAN

In the time since the 2010 - 2013 Area Plans were approved, the Lieutenant Governor's Office on Aging (LGOA) has worked closely with its aging network partners in South Carolina to address the challenges in improving and modernizing outdated practices and policies associated with a forty-eight (48) year old service delivery system.

Since 2009, the LGOA has established multiple innovative best practices which have resulted in an improved, comprehensive delivery system that now has measurable and attainable goals, while also encouraging transparency and accountability. In submitting their 2014-2017 Area Plans, the Planning Service Areas (PSAs) and Area Agencies on Aging (AAA)/Aging and Disability Resource Centers (ADRCs) are expected to embrace these best practices and comprehensive policies.

In order to receive Older Americans Act (OAA) and State funding for 2014 through 2017, each PSA and AAA/ADRC is required to submit an Area Plan following the process stipulated by the LGOA. Area Plans will be reviewed by the LGOA in accordance with instructions and/or guidelines provided by the LGOA, and the uniform area plan format and procedures outlined in this Area Plan Guideline document. Once the LGOA has reviewed an Area Plan, a written report shall be sent to the applicant should any modifications be needed prior to approval of the plan. Each PSA and AAA/ADRC Director shall be required to provide the LGOA with a formal presentation detailing its Area Plan prior to approval.

It is the responsibility of the PSA and AAA/ADRC to prepare an Area Plan document which accurately reflects the goals of the aging network within its planning and service area, while also taking into account the directives set by the Older Americans Act (OAA), the 2012 State Plan, the terms and conditions set by the Multigrant Notice of Grant Award (NGA), and the South Carolina Aging Network's Policies and Procedures Manual.

In order to draft an Area Plan that accurately reflects the new direction and goals set by the Administration on Community Living (ACL), (hereafter referred to as the Administration on Aging (AoA)), Lieutenant Governor Glenn McConnell, and the LGOA, the 2014 – 2017 Area Plan must be an innovative, forward-thinking document that provides a clear blueprint and guide for the PSA and AAA/ADRC over the next four (4) years.

In addition to being a blueprint for addressing the new paradigm set by the AoA and the LGOA, the Area Plan shall also be a document which provides best practices for service delivery, accountability, and transparency, not only within the structure of the PSA and AAA/ADRC, but within the entire aging network of its planning and service area region. Through the Area Plan, the PSA and AAA/ADRC will provide clear monitoring protocols, verification of services provided, and verification of service units earned, as well as the many assurances required by these instructions. The Area Plan must show that the PSA and AAA/ADRC have a clear understanding and knowledge of all activities and services provided throughout its region.

Area Plans are expected to be original, direct, clear, and as concise as possible, without excluding any pertinent information. In addition, the LGOA expects the document to be forward-thinking and innovative, focusing on the activities planned by the PSA and the

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AAA/ADRC during the Area Plan period, and how those activities will benefit older persons and the aging network in their respective region.

The Area Plan is intended to be a working blueprint of activities, goals, and assurances necessary to direct the PSA and AAA/ADRC throughout the next four (4) years. The Area Plan will be continually reviewed and monitored by the LGOA to ensure that crucial functions are executed to the specifications of the approved plan. In order to ensure that the Area Plan is being properly applied and followed, the LGOA will conduct monitoring through site visits, financial and service report reviews, and annual Area Plan Updates.

Failure to fulfill the assurances outlined in the Area Plan's Verification of AoA and LGOA Assurances and General Conditions, or meet the terms set by the Verification of Intent, may result in the PSA and AAA/ADRC being found non-compliant and possibly designated as High-Risk.

Once approved, the Area Plans will be placed on the LGOA website in the PSA Resources section (formerly known as the Provider's section).

The Area Plan process is being coordinated by Gerry Dickinson, the LGOA Policy Manager. All questions regarding the Area Plan process and instructions should be directed to Gerry at (803) 734-9867 or gdickinson@aging.sc.gov.



## Section Two (2)

## Procedural Changes for the 2014 – 2017 Area Plan

#### 2. PROCEDURAL CHANGES FOR THE 2014- 2017 AREA PLAN:

The Area Plan Instruction Guide has one major procedural change for 2014 – 2017. With the 2014 – 2017 Area Plan, the Planning Service Area (PSA) Director will be expected to provide a forty-five (45) minute formal presentation detailing the Area Plan for the planning and service area region and the Area Agency on Aging (AAA)/Aging and Disability Resource Center (ADRC) Director will have fifteen (15) minutes to follow-up. At the conclusion of the presentations, there will be a question and answer session conducted by the LGOA leadership.

The instructions for the Area Plan formal presentation are found in the appendix of this document.





## Section Three (3)

## Instructions for the 2014 – 2017 Area Plan

#### 3. INSTRUCTIONS FOR THE 2014 – 2017 AREA PLAN

The Area Plan is a public document that should present essential information clearly, and should be easily understood by the public and aging network partners. The document shall be written using concise sentences and paragraphs, as well as clearly defined charts, graphs, and diagram legends.

The Area Plan should be reflective of the actual activities and services provided in the planning and service area, the operations of the PSA and AAA/ADRC, and of the long range planning and forecasting for the aging network in the region.

According to Older Americans Act (OAA) and LGOA requirements (specific details will be provided in Section six (6)), the plan must:

- document the extent of the need for supportive, nutrition, and wellness services, and the need for multi-purpose senior centers in the planning and service area;
- provide demographic information used in determining the scope of services funded;
- identify the efforts of voluntary organizations in terms of meeting needs;
- justify the level of funding budgeted for access to services, in-home services, and legal assistance in the planning and service area;
- identify designated focal points in the planning and service area;
- set specific objectives for providing services to older persons with the greatest economic need; those with greatest social need; low-income and low-income minority older persons; older persons residing in rural areas;
- older individuals with limited English proficiency, and older individuals at risk for institutional placement (OAA 306(a)(4)(A)(i)(I)(aa)and(bb));
- provide information on the extent to which the AAA/ADRC met the objectives that were set in the prior fiscal year;
- identify the populations targeted for outreach in the planning and service area;
- outline the planning, advocacy, and systems development of the AAA/ADRC;
- assure that the AAA/ADRC will coordinate planning, identification, assessment of needs, and provision of services for older persons with disabilities, with particular attention to individuals with severe disabilities, and individuals at risk for institutional placement with agencies that develop or provide services for individuals with disabilities;
- outline advocacy issues for older persons in the planning and service area and the manner in which the AAA/ADRC plans to address these issues;
- describe activities that facilitate the coordination of community-based, long term care services designed to enable older persons to remain in their homes;
- describe the Long Term Care Ombudsman Program as operated within the planning and service area;
- provide grievance procedures for older persons who are dissatisfied with or denied services;
- coordinate OAA Title III services with those funded under OAA Title VI (Native American programs) when applicable;
- identify the policies that ensure that the AAA/ADRC maintains the integrity and public purpose of services and service providers in all contractual and commercial relationships;

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- describe goals for further development of regional information and referral services;
- discuss the development of the Family Caregiver Support Program, with particular attention to the portion of the program that addresses the needs of older individuals caring for relatives who are children;
- provide information on the I-CARE and Medicare Fraud Prevention services in the planning and service area;
- justify the direct provision of any supportive, nutrition, in-home, or wellness services, by the AAA/ADRC;
- develop a regional training plan;
- provide data on the impact of contributions and cost sharing revenues to expand services;
- describe the process for gathering the views of program beneficiaries regarding matters of general policy development and administration of the Area Plan;
- assure that the AAA/ADRC contracts with providers/contractors of supportive, nutrition, wellness services, or multi-purpose senior centers for the provision of such services; and
- assure that the AAA/ADRC contracts for legal assistance services only with providers who can meet the requirements of the OAA and the LGOA.

The Area Plan contains nine (9) sections, which are outlined in Section Six (6) of the 2014 – 2017 Comprehensive PSA and AAA/ADRC Area Instruction Guide and Assurances document. Sections one (1) through seven (7) of the Area Plan are limited to a maximum number of pages. The PSA is encouraged to be direct as possible when stating the goals and activities that the AAA/ADRC will be expected to fulfill over the four (4) year period.



## **Section Four (4)**

## Required Formatting for the 2014 – 2017 Area Plan

#### 4. REQUIRED FORMATTING FOR THE AREA PLAN:

- All pages shall have a margin of one (1) inch on the top, bottom, and right side. The left side margin shall be 1.5 inches to allow for binder holes.
- The document shall be set to Times New Roman, font size twelve (12), except for section headings which shall be font size fourteen (14) and bold.
- Sentences shall be singled spaced, with a 1.5 dividing line between paragraphs.
- There shall be no divider "title" pages to designate each section. If the AAA/ADRC wants to add notebook index pages, they will be acceptable because they do not count in the number of pages allowed for each section.
- There shall be a header providing the name of the PSA & AAA/ADRC and the date submitted.
- There shall be a footer providing the page number.
- The Area Plan document will utilize Word Navigator in order to expedite word or topic services searches and be linked to the Table of Contents.
- Any pages that use color, such as charts or graphs, should be copied (printed) in color.





## **Section Five (5)**

## Submission of the 2014 – 2017 Area Plan

#### 5. SUBMISSION OF THE AREA PLAN:

The Area Plan will be due on **June 3, 2013**.

- Five (5) copies of the plan must be sent to the LGOA in three-ring binders of appropriate size to hold both the plan pages and any appendices the PSA and AAA/ADRC provides. The original copy shall be marked as such on the front of the binder.
- The LGOA Area Plan Coordinator shall be sent an electronic Word document and a PDF.file of the entire assembled Area Plan via E-Mail by the close of business on the due date. The email address is Gdickinson@aging.sc.gov.

If the agency Board or the Regional Aging Advisory Council (RAAC) meetings set to approve the Area Plan are scheduled after the submission date, omit the pages that contain such approval and submit the plan as a draft. The signature pages and any edits required by these boards shall be forwarded to the LGOA by the second business day following the last of these meetings. The LGOA Area Plan Coordinator shall be kept updated of any delay to Area Plan submission due to board actions.

The PSA and AAA/ADRC Directors shall be notified by the LGOA concerning the date for their Area Plan formal presentation.

The Area Plan will be reviewed by selected LGOA staff between June 3 and June 30. Should any clarifications be required, the AAA/ADRC will be notified prior to their formal presentation. Clarifications will be due before the formal presentation if needed.

No payments will be made under the 2014 - 2017 Area Plan until it has been approved by the LGOA.



## Section Six (6)

# The 2014 – 2017 Area Plan Document Outline And Required Content

#### 6. REQUIRED DOCUMENT OUTLINE FOR THE AREA PLAN

#### I. Introduction

- a. Purpose
- b. Verification of Intent (can be found in appendix of this document)
- c. Verification of AoA and LGOA Assurances (can be found in appendix of this document)

#### **II.** Executive Summary

### III. Overview of the Area Agency on Aging (AAA)/Aging and Disability Resource Center (ADRC)

- a. Mission Statement
- b. Vision for the four (4) years covered by this plan
- c. Organizational Structure
- d. Staff Experience and Qualifications
- e. Regional Aging Advisory Council Board
- f. Current Funding Resources for AAA/ADRC Operations
- g. Written Procedures
- h. Sign-in Sheets
- i. Activity Calendars
- i. Service Units Earned
- k. Reimbursement for Services
- 1. Client Data Collection
- m. Client Assessments
- n. General Fiscal Issues
- o. General Provisions for the AAA/ADRC
- p. High-Risk Providers/Contractors and Corrective Action Plans (CAP)

#### IV. Overview of the Planning and Service Area Region

- a. Service Delivery Areas
- b. Objectives and Methods for Services to OAA Targeted Populations
- c. Ten-year Forecast for the Planning and Service Area Region
- d. Emergency Preparedness
- e. Holiday Closings

#### V. AAA/ADRC Operational Functions and Needs

- a. Assessment of Regional Needs
- b. Program Development
- c. Program Coordination
- d. AAA/ADRC and Long Term Care
- e. Advocacy
  - Health and Human Services;
  - o Land Use;
  - Housing;
  - o Transportation;
  - Public Safety;
  - Workforce and Economic Development;
  - o Recreation;
  - o Civic Engagement;
  - o Emergency Preparedness; and
  - o Services Determined by the Needs Assessment.
- f. Priority Services
- g. Priority Service Contractors
- h. Transportation

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- i. Nutrition Services
- j. Training and Technical Assistance
- k. Monitoring
- 1. Contract Management
- m. Grievance Procedures
- n. Performance Outcome Measures
- o. Resource Development
- p. Cost-Sharing and Voluntary Contributions
- q. Confidentiality and Privacy

#### VI. AAA/ADRC Direct Service Delivery Functions

- a. Staff Experience and Qualifications
- b. Long-term Care Ombudsman Services
- c. Information, Referral, and Assistance Services
- d. Insurance Counseling and Senior Medicare Patrol
- e. Family Caregiver Support Program
- f. Disease Prevention/Health Promotion

#### VII. Changing Demographic Impact on AAAs/ADRCs Efforts

- a. Intervention vs. Prevention
- b. Senior Center Development and Increased Usage
- c. Alzheimer's Disease
- d. Legal Assistance

#### VIII. Region Specific Initiatives

IX. Appendices

#### THE AREA PLAN DOCUMENT (REQUIRED FORMAT AND CONTENT)

#### I. INTRODUCTION

The Introduction shall include the following:

- a. Purpose (two (2) pages or less);
- b. Verification of Intent (form provided in the appendix); and
- c. Verification of AoA and LGOA Standard Assurances (form provided in the appendix).

#### II. EXECUTIVE SUMMARY

The Executive Summary is the first section of the Area Plan. As the opening section of the document, the executive summary should briefly summarize the Area Plan. It must provide an accurate account of the PSA and AAA/ADRC, and its proposed activities and services for the 2014 - 2017 time period.

The Executive Summary is expected to emphasize the major issues, trends, and goals set by the AAA/ADRC. As in any document of this importance, the LGOA strongly suggests it be the last section drafted so that it accurately reflects the data and key information found in the other sections of this Area Plan.

The Executive summary should be less than five (5) pages in length.

The Executive summary shall also answer the following questions:

- 1. What will be the role of the PSA and AAA/ADRC over the four-year period, and what activities and services will the AAA/ADRC promote during that time?
- 2. What improvements in monitoring, fiscal responsibility, and service delivery can be expected during the Area Plan period?
- 3. How will these actions improve service delivery, PSA and AAA/ADRC operations, and the aging network within the region?
- 4. How will the PSA and AAA/ADRC recognize and measure the changes, activities, and services?
- 5. How will the PSA and AAA/ADRC ensure that all required activities of the Older Americans Act (OAA) and the LGOA are being followed and properly administered throughout the four-year plan period?
- 6. What region specific protocols have been established to improve efficiency and service delivery?

## III. OVERVIEW OF THE AREA AGENCY ON AGING (AAA)/AGING AND DISABILITY RESOURCE CENTER (ADRC)

This section is limited to ten (10) pages (not including the assurances in that total). The overview shall address the following:

- a. **Mission statement:** (for the aging unit)
- b. Vision for the four (4) years covered by this plan: (region specific)
- c. **Organizational Structure:** If the AAA/ADRC is not free-standing, the narrative must address placement of the aging unit within the multipurpose organization. In

- addition to the narrative, the AAA/ADRC shall submit organizational charts of the overall operations of the multipurpose organization and of the AAA's/ADRC's operations with the aging unit as plan Appendix A. The director of the multipurpose agency must certify that the aging unit functions only as the AAA/ADRC for the purpose of carrying out the nine (9) AAA/ARDC functions specified in the Older Americans Act (OAA).
- d. **Staff Experience and Qualifications:** The AAA/ADRC shall identify all staff currently assigned to the aging unit by their primary responsibility and job title. Summarize the qualifications and experience pertinent to their assigned responsibilities. Do not submit resumes in the plan. Address the transition planning that will occur during this plan period as related to anticipated turnover in the aging unit due to retirements, promotions, reductions in force, etc. (Do not include direct service delivery staff in this section.)
- e. **Regional Aging Advisory Council Board:** The AAA/ADRC shall provide the LGOA information on how Regional Aging Advisory Council (RAAC) Board members are selected, appointed, or elected; the established terms of office; and RAAC by-laws. What is the role of the RAAC in the region and how does the AAA/ADRC utilize the board? Describe how the RAAC Board members are actively engaged in the aging network in the planning and service area?
- f. Current Funding Resources for AAA/ADRC Operations: Along with the OAA and State funds allocated by formula to the planning and service area region, specify all other sources and amounts of revenue available for the planning and administration of operations of the aging unit. Include any discretionary grants from the LGOA, other State agencies, direct Federal grants, foundation grants, and local resources that provide financial support to the administrative functions of the aging unit. Specify the source and purpose of any grant/program administered by the aging unit that prohibits administrative expenditures. This information should be provided in a table format. The director of the multipurpose agency must certify that the AAA/ADRC shall not use funds received under the Older Americans Act (OAA) to pay any part of a cost incurred to carry out a contract or commercial relationship that is not necessary to implement Older Americans Act requirements. (Do not discuss the service delivery activities carried out at the AAA/ADRC level in this section.)
  - Each funding source shall have a distinct client population. A new client, who is
    in need of the service and meets the eligibility criteria of that funding source, will
    be added when such vacancies occur. In its Area Plan, the AAA/ADRC shall
    describe its protocols for ensuring that each funding source has a distinct client
    population.
  - Discuss the policies and protocols that the PSA has in place to certify fiscal integrity for the AAA/ADRC and its providers/contractors.
- g. **Written Procedures:** Provide a summary of the AAA's/ADRC's written policies and procedures. The AAA/ADRC shall have a comprehensive, written policies and procedures manual for complying with all of its functions as prescribed in the OAA and the LGOA. These written policies and procedures shall be available at the

- AAA/ADRC for inspection upon request and are subject to the South Carolina Freedom of Information Act (FOIA) requirements.
- h. **Sign-in Sheets**: Describe the protocols that the AAA/ADRC has in place to ensure that its providers/contractors are using the LGOA approved sign-in sheet (LG-94) for group dining sites. Also, describe the protocols in place to ensure that homedelivered meals are being provided in accordance with the South Carolina Aging Network's Policies and Procedures Manual, as well as the procurement contracts signed by the AAA/ADRC and its providers/contractors. This should include the process for the driver signing the meal route document daily and being certified by the provider/contractor.
- i. **Activity Calendars**: Describe the protocols in place to monitor activity calendars to ensure that the providers/contractors are providing activities in accordance with the OAA and LGOA policies.
- j. Service Units Earned: Describe the protocols that address how the AAA/ADRC ensures its providers/contractors are earning their units in accordance with the OAA and LGOA policies.
- k. Reimbursement for Services: The AAAs/ADRCs shall include as part of their Area Plan, a breakdown of the components of the unit cost for each different unit of service, and the methodology showing how the unit cost is determined. The cost justification shall include the assessment costs (fixed assessment costs), activities costs, product costs, administrative costs, and any other relevant variable that contributes to the overall rate.
  - The AAA/ADRC shall provide the process it uses to verify the provider's/contractor's unit costs.
  - The PSA and AAA/ADRC shall provide the LGOA with a written plan, which addresses how the AAA/ADRC shall ensure that providers/contractors are earning their units in accordance with the OAA and LGOA policies.
- Client Data Collection: The AAA/ADRC shall describe the protocols in place to
  ensure that each of its providers/contractors accurately input client data into the
  authorized LGOA client data collection system. Describe the AAA's/ADRC's
  policies and procedures for the Advanced Information Management (AIM) system to
  document and track service units. Describe the procedures used by the AAA/ADRC
  to certify the AIM data is being inputted accurately according to procedures set by the
  LGOA.
  - The AAA/ADRC shall show how it utilizes the On-line Support Assistant (OLSA) to record contacts, accurately input and monitor data, and provide trainings. All client contact data will be captured and immediately keyed into OLSA (preferably by an AIRS Certified Specialist) after a contact is made with a client, successfully ensuring accuracy and timeliness.
  - The AAA/ADRC shall describe how it utilizes all other LGOA required client data information systems such as SHIP Talk and the Ombudsman system.
- m. Client Assessments: Provide an overview of the AAA's/ADRC's assessment process in accordance with the assessment policies set by the LGOA and the South Carolina Aging Network's Policies and Procedures Manual (this overview must include how initial and

annual reassessments are conducted). In addition, describe the protocols put in place by the AAA/ADRC to ensure that the same entity does not conduct client assessments, pick the clients, and provide the services.

Each service delivery contract under the Area Plan shall require the provider/contractor to reassess service recipients no less than annually, with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, older individuals residing in rural areas, and eligible individuals, as defined in the Older Americans Act.

The Area Plan shall address the following assessment issues:

- Describe how the AAA/ADRC ensures, based on the assessment process, that the provider/contractor provides services to individuals with the greatest need.
- Explain the protocols used by the AAA/ADRC for senior clients who must be terminated because of low priority scores (these clients should be provided an opportunity to continue to receive services as a private pay recipient or as a partial-pay recipient subsidized through local resources, if available).

#### n. General Fiscal Issues

In this summary, include components found in the Verification of AoA and LGOA Assurances found in this guide, as well as the policies set by the South Carolina Aging Network's Policies and Procedures Manual.

The Area Plan shall briefly address the following fiscal issues.

- The AAA/ADRC will expend any prior year funds first, before expending any new funds
- Planning and administration funds for Title III-B, III-C-1, and III-E of the Older Americans Act must be expended before any program development or OAA Title III-E service funds are expended for AAA/ADRC staff activities.
- The Federal share of a grant award is earned only when the cost is incurred and the non-Federal share of the cost has been contributed.
- All invoices and all financial and program reports must be submitted in the format provided by the LGOA and on the schedule(s) set by the LGOA. Invoice and financial reports shall be submitted to the Accounting and Finance Division, while program reports will be submitted to the appropriate program manager as stipulated by the LGOA.
- All invoices submitted to the LGOA must include a breakdown of the provider's/contractor's unit costs and the AAA's/ADRC's verification of the unit costs and the units earned. In addition, the AAA/ADRC shall be expected to provide the methodology for calculating that unit cost (for example based on CPI, Administration, Meal Expenses, Actual Costs and AAA/ADRC Administrative costs.)
- Payment requests for both internal and flow-through expenditures must be submitted monthly in accordance with the policies set by the LGOA. The AAA/ADRC is required to keep invoices current in the event of mid-year budget cuts or reductions.

• Any AAA/ADRC that expends a total of \$500,000 or more in Federal awards must monitor delivery, and have an audit that complies with OMB Circular A-133 and submit that audit to the LGOA within nine (9) months after the close of the organization's fiscal year.

#### o. General Provisions for the AAA/ADRC in the Area Plan

Briefly address the following general provisions (include components found in the Verification of AoA and LGOA Assurances found in this guide, as well as the policies set by the South Carolina Aging Network's Policies and Procedures Manual):

- Describe the protocols for complying with all applicable Federal and State laws, regulations, and guidelines, as well as the policies and procedures of the LGOA.
- Describe the protocols for the AAA/ADRC and its providers/contractors to comply with the policies and procedures set by the South Carolina Aging Network's Policies and Procedures Manual and any Program Instructions (PI) issued during the grant period.
- Describe how the PSA and AAA/ADRC utilizes Geographic Information System (GIS) mapping in order to determine if Older Americans Act (OAA) targeted client populations are being served in their planning and service areas.
- Describe the protocols the AAA/ADRC, and those with whom they contract, use
  to ensure that persons with limited English language skills receive, free of charge,
  the language assistance necessary to afford them meaningful and equal access to
  the benefits and services provided under this grant award. Explain what steps the
  AAA/ADRC has taken to procure an interpretive service in order to serve seniors
  who do not speak English as their primary language.

#### p. High-Risk Providers/Contractors and Corrective Action Plans (CAPs)

Describe what protocols and procedures the PSA and AAA/ADRC have set for the four-year Area Plan period in the event that a provider/contractor does not deliver services or is not capable of adhering to the terms set by the procurement contract (for example calendars, activities, and/or other contracted services). The LGOA is looking to see how the PSA and AAA/ADRC determine a provider/contractor is high-risk and how Corrective Action Plans (CAPs) will be employed to correct the situation. Include specific examples of CAPs and how the PSA and AAA/ADRC will de-designate a provider/contractor if that action is warranted.

#### IV. OVERVIEW OF THE PLANNING AND SERVICE AREA REGION

This section is limited to fifteen (15) pages. The overview shall include the following:

a. **Service Delivery Areas (SDAs):** Provide a map of the region that shows the location of specific service delivery areas included in the Requests for Proposals (RFPs) for this Area Plan period. Identify the cities, towns, and communities for which the AAA/ADRC is purchasing services or directly providing services for older adults.

The Area Plan shall address the following:

• Provide GIS maps showing that its clients meet the requirements (at-risk clients) specified by the Older Americans Act. These maps should pay particular attention to

rural and low-income clients. Maps will be expected to show where each category of "at-risk" senior clients within the planning and service area.

- Provide a timetable of how often the AAA/ADRC will use GIS Mapping to analyze the clients being served in the region. Explain in the plan how GIS mapping will ensure that those clients with the greatest needs are being served.
- b. Objectives and Methods for Services to OAA Targeted Populations: Describe the projected demographics of the targeted aging population for each specified SDA for the next four (4) years. Provide the specific objectives that the AAA/ADRC has set for Requests for Proposals (RFPs), or will set in service contracts, for meeting the targeted populations in each of these areas. Provide the criteria for evaluating the methods proposed in the response to the RFPs for meeting those targeted objectives. (Objectives and evaluation criteria may be presented as a table.)
- c. **Ten-Year Forecast for the Planning and Service Area Region:** In this section, the AAA/ADRC shall address the changing demographics of the planning and service area region and what activities it is engaging to address the projected changes. This discussion should focus on the varied population shifts and growing cultural diversity in communities throughout the region. Discuss how increased life expectancy has impacted the region, specifically disabled older adults and older adults with Alzheimer's disease.

This section should also describe the challenges that regional demographic and economic changes create for:

- transportation systems;
- nutrition services (group and home-delivered);
- information and referral;
- affordable housing;
- medical facilities (physical and mental);
- workforce availability;
- long term care systems;
- service expectations of seniors and caregivers;
- distribution of existing resources;
- creation of new resources;
- policy changes;
- legal assistance;
- development and location of multipurpose senior centers; and
- emergency preparedness.

From this list, the AAA/ADRC shall address the top four (4) issues expected to have the most impact on older adults in this region. Outline activities among the planning and administrative responsibilities of the AAA/ADRC that will be most effective in addressing each of these four (4) issues over the area plan period.

d. **Emergency Preparedness:** The AAAs/ADRCs are responsible for developing emergency/disaster preparedness and response plans for their planning and service areas. The AAA/ADRC shall provide information on how it develops long-range emergency

preparedness plans and coordinates emergency preparedness activities with local and State emergency response agencies, relief organizations, local and State governments, and any other institutions or organizations that has responsibility for disaster relief service delivery in their region. Provide details on the AAA's/ADRC's role and involvement in disaster preparation, response, and recovery as part of the overall emergency preparedness efforts in planning and service areas. The AAA/ADRC shall adhere to the policies and procedures on emergency preparedness found in the South Carolina Aging Network's Policies and Procedures Manual, and fully describe how it plans to coordinate its services in accordance with the Manual.

The Area Plan shall address the following for disaster and emergency preparedness:

- Summarize the emergency/disaster plan including when the AAA/ADRC meets with all county emergency management directors in their region to ensure that there is a working relationship between the counties and the AAA/ADRC. Summarize how the AAA/ADRC maintains up-to-date emergency contact information for AAA/ADRC staff, directors of providers/contractors agencies, and county emergency management officials in the event of a disaster or emergency. (Copies of the emergency contact information must be included as an appendix in the Area Plan.)
- Explain how the AAA/ADRC annually reviews and updates its disaster preparedness and response plan (this plan establishes the protocols that the AAA/ADRC uses to coordinate its emergency activities with the LGOA, State Emergency Management Division (EMD), local EMD, and the aging network).
- Note who on the AAA/ADRC staff coordinates emergency preparedness response activities and who keeps updated emergency contact information for the local EMD officials, AAA/ADRC staff, and the LGOA Emergency Preparedness Coordinator.
- Note who on the AAA/ADRC staff is designated to be on call throughout the duration of a declared disaster, and how this staff shall maintain communications with the LGOA Emergency Preparedness Coordinator.
- Provide information on how often the AAA/ADRC Emergency Coordinator attends meetings and trainings with the local EMD.
- Describe the protocols and resources the AAA/ADRC has in place to maintain and manage an emergency operations center with computers and phones during a declared emergency.
- Explain the protocols for AAA/ADRC collaboration with providers/contractors to develop an emergency service delivery plan for group dining and home-delivered meals, transportation, home care, and other critical services until the declared emergency has ended and normal operations are back up. (This emergency service delivery plan must be included in each contract signed between the AAA/ADRC and an aging service provider/contractor.) The emergency plan shall also cover general agency operations during periods of crisis, hazardous weather, emergencies, and unscheduled closings.
- Describe the protocols in place to identify those seniors with the greatest need to be evacuated before other individuals in the community; and what determines that priority.
- Describe the process for AAA/ADRC computer records being regularly backed up so that the agency can resume services immediately after an emergency, and the protocols for storing computerized backed up records at a safe location.

- Describe the relationship the AAA/ADRC has with contacts and partners in the community for emergency preparedness and disaster relief, and how the AAA/ADRC collaborates with these partners. This should include, but not be limited to, the Salvation Army, American Red Cross, food banks, and United Way.
- Describe what protocols the AAA/ADRC has in place to ensure that seniors continue to receive food, transportation, and other critical services until the declared emergency has ended and normal delivery systems resume operation.
- Provide information on any and all Memorandum of Agreement (MOA) with other AAAs/ADRCs regarding mutual aid provisions of staff and/or equipment to maintain operation of an AAA/ADRC impacted by an emergency or disaster.
- e. **Holiday Closings:** The AAAs/ADRCs shall include their providers'/contractors' holiday schedules in their Area Plan. These scheduled closings shall be part of the contract established between the AAA/ADRC and providers/contractors. Any changes to the scheduled holiday closings must be noted in the Area Plan update.

#### V. AAA/ADRC OPERATIONAL FUNCTIONS AND NEEDS

This section shall include no more than twenty (20) pages. The AAA/ADRC Operational Functions and Needs shall include:

- a. **Assessment of Regional Needs:** Specifically address in this section how the needs and issues resulting from the needs assessment conducted in preparation for this Area Plan will be incorporated into the work of the AAA/ADRC over the next four (4) years. (The actual needs assessment report shall be included as plan Appendix B.)
- b. **Program Development:** Provide information on what the AAA/ADRC will do over the Area Plan period with allocated resources to address the growing demand for consumer choice and its efforts to develop capacity for providers/contractors to offer private pay service options. Highlight providers/contractors successfully utilizing consumer choice and private pay measures.
- c. **Program Coordination:** Briefly describe the actions that the AAA/ADRC will use to work with directors and staff of providers/contractors, other service delivery agencies, and programs operating in the region to coordinate program activities for efficient and effective use of limited resources to meet identified needs.
- d. **ADRC** and **Long Term Care:** The AAA/ADRC shall describe how the transformation to ADRCs improved services in the region and provided more access to, or information for, community-based options for long term care. How has the conversion to an ADRC benefited the AAA/ADRC and its aging population within the region? What planning and coordination is being employed to improve these services in the next four (4) years?
- e. **Advocacy:** Describe what efforts are being taken by the AAA/ADRC to enhance advocacy in the planning and service area in accordance with the OAA, and what improvements can be expected in the next four (4) years. The OAA states, "An area agency on aging... may make recommendations to government officials in the

planning and service area and the State, on actions determined by the AAA/ADRC to build capacity in the planning and service area to meet the needs of older individuals for:

- Health and human services:
- Land use:
- *Housing*;
- Transportation;
- *Public Safety*;
- Workforce and economic development;
- Recreation:
- *Education*;
- Civic engagement;
- Emergency preparedness; and
- Services determined by the needs assessment."
- f. **Priority Services:** Describe the procedures used by the AAA/ADRC to determine the amount of OAA Title III-B funds needed to purchase an adequate supply of each of the priority services identified in the Older Americans Act (OAA); namely, access services (transportation and information and referral), in-home services, and legal assistance services.
- g. **Priority Service Contractors:** The AAA/ADRC shall address the accountability of the provider/contractor and how it determines the eligibility of providers/contractors from whom they purchase priority services. This description shall address how the selected providers/contractor meets the requirements of OAA Section 307(a)(11)(A) through (E).
- h. **Transportation:** The AAA/ADRC shall assess the transportation needs of the planning and service areas via their assessments in order to ensure that the transportation service activities are coordinated according to their transportation needs. Regional transportation assessments and coordination of services should be reflected in the Area Plan. Describe how the AAA/ADRC ensures that transportation providers/contractors are earning their units in accordance with the OAA and LGOA policies.
- i. **Nutrition Services:** The AAA/ADRC shall describe how nutrition services in the planning and service area have changed over the past four (4) years (demographics of participants, numbers of meals served, locations, and days of operations of group dining centers, increases in transfers from group dining to home-delivered meals or vice versa, and other changes noted by the AAA/ADRC). In addition, forecast the expected nutrition services changes for 2014 2017 in the planning and service area.

The Area Plan shall address the following for Nutrition Services:

- The AAA/ADRC shall describe its protocols for ensuring that nutrition providers/contractors are earning their units for reimbursement purposes.
- The AAA/ADRC shall describe its protocols for ensuring that group dining sites have the minimum twenty-five (25) meal participants required each day.

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- The AAA/ ADRC shall describe its protocols for ensuring that group dining sites have planned activities based on the requirements of the OAA and LGOA, and that each site provides activities at least four (4) hours daily and has approved activity calendars.
- Outline the nutrition service delivery plan for the planning and service area, with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, older individuals residing in rural areas, and other eligible individuals, as defined in the OAA.
- Describe the AAA's/ADRC's written policies, priorities, and methods for serving older persons as stipulated by OAA for targeted populations. Preference is given to those older persons in greatest social or economic need in the provision of services in 45 Code of Federal Register (CFR) 1321.17(f)(2). Methods used to target services may include location of service delivery and specialization in the types of services most needed by these groups. The AAA/ADRC shall assess the level of need for group dining and homedelivered meals within its planning and service area and establish criteria for service providers/contractors to use in the selection of individuals to participate.
- The AAA/ADRC shall establish an action plan as a part of its Area Plan to encourage its nutrition providers/contractors to enact cost-sharing and private pay measures when procuring service contracts.
- AAAs/ADRCs should put a detailed cost sharing plan for client services in their Area Plans. Clients using State funds shall be encouraged to cost share.
- Describe the protocols used by the AAA/ADRC to review regional menus including input from a registered dietitian and the appropriate LGOA staff.
- Describe the protocols the AAA/ADRC uses to ensure that all current certified menus are posted in an accessible and visible location in each group dining center, as well as at each place of food preparation and plating. (The provider/contractor must abide by the certified menus. The Vendor or provider/contractor of food services may make changes to the certified menu only with prior approval from the AAA/ADRC. The AAA/ADRC shall state in its Area Plan how requests for menu changes are approved.)
- Describe in detail the AAA's/ADRC's plan to outreach with local retail food businesses, school districts, hospitals, and other locations to promote and encourage intergenerational meal programs and/or meal variety.
- j. **Training and Technical Assistance:** The AAA/ADRC shall assure through the Area Plan that it is providing technical and programmatic assistance and training opportunities for AAA/ADRC staff and providers/contractors. Including components found in the Verification of AoA and LGOA Assurances found in this guide, as well as the policies set by the South Carolina Aging Network's Policies and Procedures Manual. The AAA/ADRC shall address the following:
  - Specific program areas that the AAA/ADRC has identified as needing technical
    assistance or training. Following the protocols established by the South Carolina Aging
    Network's Policies and Procedures Manual, describe the methods or resources that the
    AAA/ADRC employs to improve each of these program areas. How will the
    AAA/ADRC provide individualized technical assistance to new service delivery

providers/contractors? Describe those resources the AAA/ADRC uses in provision of effective technical assistance?

- The AAA/ADRC is responsible for designing and implementing a regional training and education plan. This plan should be comprehensive in nature and reflect the training requirements identified by the AAA/ADRC, address the service priorities in the Area Plan, and complement State efforts. The training should address geographical characteristics, demographics, infrastructure, GIS Mapping, and local and community partnering resources. The annual needs assessment should be the blueprint necessary to identify the types of trainings necessary in the region.
- k. Monitoring: Describe the procedures established by the AAA/ADRC to determine if the providers/contractors are delivering services as described in the provider's/contractor's Request for Proposal (RFP) and contract. Address the AAA/ADRC policies regarding formal visits to providers/contractors and unannounced provider/contractor visits. Describe what corrective action the AAA/ADRC takes with providers/contractors who fail to deliver contracted services, or to follow the methods of service delivery described in the RFP response.

Including components found in the Verification of AoA and LGOA Assurances found in the 2014 – 2017 Comprehensive PSA and AAA/ADRC Instructions Guide and Assurances document, as well as the policies set by the South Carolina Aging Network's Policies and Procedures Manual, the AAA/ADRC shall address the following monitoring issues:

- The LGOA requires that AAAs/ADRCs maintain proper accounts with all necessary supporting documents. Such accounts must be in a form, approved by the LGOA, which provides an accurate and expeditious determination of the status of all Federal and non-Federal funds at any time, including the disposition of funds received and the nature and amount of all expenditures and obligations claimed against OAA and State allotments. AAAs/ADRCs shall enter the liability for the local matching funds in the appropriate accounts when payment is requested from the LGOA. The AAAs/ADRCs shall assure the LGOA that all funds requested for payment shall be for service units and services actually provided and earned by the providers/contractors. The AAAs/ADRCs shall provide and maintain written assurances through their Area Plans and annual updates to monitor and audit the payment requests for accuracy and integrity purposes.
- The AAA/ADRC shall describe its policies for allowing audits, reviews, and examinations of financial and programmatic records. The AAA/ADRC will make programs and financial records, as well as service delivery sites open to representatives of the LGOA, the United States Government Accountability Office (hereafter, "GAO"), the State Auditor, the State Attorney General's Office, the United States Department of Health and Human Services (hereafter, "USDHHS"), and/or any designees of the above.
- 1. **Contract Management:** The PSA and AAA/ADRC shall purchase services only from providers/contractors that provide the LGOA with all requested data in the format necessary to document the outcome of services purchased. Describe what criteria the PSA and AAA/ADRC uses to determine if a provider/contractor will receive a contract extension or termination at the end of each year. Provide in detail what protocols and monitoring

procedures are in place to verify that services are delivered in accordance with each program's requirements. These protocols and procedures shall include the components found in the Verification of AoA and LGOA Assurances found in this guide, as well as the policies set by the South Carolina Aging Network's Policies and Procedures Manual. The PSA and AAA/ADRC shall address the following in the Area Plan.

- Assurances that the PSA and AAA/ADRC will provide electronic copies of procurement contracts and all amendments thereto, to the LGOA's Policy and Planning Manager in the Programs Services Division within thirty (30) days of execution.
- Assurances that all contracts for the procurement of services or goods that are supported with financial assistance through the LGOA adhere to applicable Federal and State procurement codes (COG: OMB Circulars A102 and A-87) (PN-P: OMB Circulars A110 and A-122).
- Through the Area Plan, the AAA/ADRC shall ensure that all nutrition providers and senior centers provide monthly calendars that accurately reflect the social activities mandated through the Older Americans Act (OAA). The AAA/ADRC and its providers/contractors shall look to the 2013 South Carolina Aging Network's Policies and Procedures Manual for guidance with the activity calendars. Activity calendars shall show innovation and provide multiple services that meet the needs of the seniors in that community.
- m. **Grievance Procedures:** Provide the procedures and protocols established by the AAA/ADRC to allow older persons who are dissatisfied with or denied services to file a grievance and to have their grievance heard. Describe how the AAA/ADRC informs the older person of the grievance procedures in the planning and service area.
- n. Performance Outcome Measures: Describe the protocols the PSA and AAA/ADRC has in place to measure performance outcomes of the contracted services delivered throughout the region and the impact on recipients. Summarize the procedures on how the AAA/ADRC determines if contracted services are having positive outcomes to improve the quality of life for older individuals.
- o. **Resource Development:** Describe the proactive initiatives the AAA/ADRC utilizes to assist providers/contractors in developing methods to increase grant related income or institute cost-sharing for allowable services such as transportation, housekeeping, chore, homemaker, personal care, home living support, group respite, adult day care, wellness services, and senior center activities. Provide data showing how many units of each contracted service were provided with grant related income or cost-sharing in the most recently completed program year.
- p. Cost-Sharing and Voluntary Contributions: Coordination and outreach efforts should be detailed in the Area Plan, with particular emphasis on coordination with entities conducting Federal programs as outlined in Section 403 B-10 of the South Carolina Aging Network's Policies and Procedures Manual. Describe how the AAA/ADRC addresses the following:

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- The AAA/ADRC shall provide for the identification of public and private resources in, or serving persons in, the planning and service area as part of their overall outreach and coordination efforts. Local aging partners should be brought into the AAA's/ADRC's planning process in order to better serve the region's older population. The AAA/ADRC shall work to coordinate the programs funded under the Area Plan with such resources to increase older persons' access to quality services.
- The voluntary contributions system adopted shall be clearly explained to individuals who use the agency's services. The explanation shall be made both verbally and in writing at the time service delivery is arranged, and shall be posted in a conspicuous location accessible to clients within the site. The explanation shall include the voluntary nature of the contribution, confidentiality policies, and how contributions are collected and used. The AAA/ADRC shall ensure that this is included in procurement contracts, and that each provider's/contractor's policy shall be included in the AAA's/ADRC's Area Plan annual update.
- Describe and provide a copy of the sliding scale used by the AAA/ADRC to guide voluntary contributions for all aging services eligible for cost-sharing in the planning and service area region.
- q. Confidentiality Assurances: The AAA/ADRC must ensure that lists of clients compiled under any programs or services are used solely for the purpose of providing or evaluating services. AAAs/ADRCs shall obtain written assurance from providers/contractors stating that they will comply with all LGOA confidentiality requirements, as well as any and all applicable Federal and State privacy and confidentiality laws, regulations, and policies. The AAA/ADRC shall provide the LGOA with confidentiality assurances through its Area Plan, annual Area Plan updates, and/or as changes are made. The AAA/ADRC shall address the following:
  - Describe the protocols that the AAA/ADRC has in place to ensure that its providers/contractors comply with all Federal and State laws and regulations regarding the confidentiality of client information, as well as the policies and procedures of the LGOA.
  - Describe the protocols in place to ensure that providers/contractors have written procedures for protecting identifying client information against unlawful distribution through any means, physical or electronic. All identifying client data must be protected through limited access to electronic records. Each employee with access to identifying client information must sign a notice prepared by the grantee specifying the requirement to maintain confidentiality and the penalty for failure to comply.
  - Describe the protocols in place to ensure that individually identifiable health information is protected in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Pub. L. No. 104-191, 110 Stat. 1936.

#### VI. AAA/ADRC DIRECT SERVICE DELIVERY FUNCTIONS

This section is limited to no more than twenty (20) pages.

- a. **Staff Experience and Qualifications:** The AAA/ADRC shall identify all staff currently assigned to direct service delivery of region wide services such as Information and Referral, I-CARE and SMP, Ombudsman, and Family Caregiver Services. Summarize the qualifications and experience pertinent to their assigned service responsibilities and the training provided to these staff members. Do not submit resumes. Address the transition planning that will occur during this plan period related to anticipated turnover in the aging unit due to retirements, promotions, and reductions in force.
- b. Long Term Care Ombudsman Services: Identify the long term care goals that the AAA/ADRC has for the Ombudsman service. Describe the relationship between the Long Term Care Ombudsman services provided in the region and by the State, and provide areas that the AAA/ADRC can work on to improve services during the next four (4) years. Discuss the major strengths of the program in its current configuration, as well as any weaknesses identified. A copy of the Long Term Care Ombudsman Service Report shall be included as Appendix C.

Each of the following components should be addressed in the Area Plan to include measurable and time-specific objectives for each program component and provide for complaint processing to be the highest priority of the program component.

- advocacy for residents of long term care facilities;
- complaint intake, investigation and resolution;
- information and assistance;
- community education;
- in-service education;
- new partner development and volunteer program development;
- visits to residents in facilities; and
- assistance with the development of resident and family councils.

#### c. Information and Referral/Assistance (I&R/A) Services

Identify the long term goals for Information and Referral/Assistance (I&R/A) within the AAA/ADRC and in the planning and service area. What weaknesses in the program have to be addressed in order to reach those goals? Discuss the major strengths of the program in its current configuration. Describe the role of SC Access in the delivery of the I&R/A services. What other resources are available to assist in service delivery? What procedures does the AAA/ADRC have for follow-up on referrals made on behalf of older adults? What challenges in the delivery of I&R/A services will be addressed over this four (4) year plan period? (Provide a copy of the program report filed for the most recently completed program year as plan Appendix D)

The I&R/A section shall also address the following components in the Area Plan:

- Describe the funding stream the AAA/ADRC uses for I&R/A and how the AAA/ADRC charges Planning and Administration funding.
- Describe the AAA's/ADRC's employment policies for hiring I&R/A staff, as it is required to employ a fulltime (or fulltime equivalent) Information and

- Referral/Assistance (I&R/A) Specialist as a requirement of receiving Title III-B and Title III-E funding.
- The AAA/ADRC shall assure in writing, through its Area Plan, that I&R/A funding is not being used to fund other programs outside of the I&R/A program area. Describe the protocols in place to ensure that the AAA/ADRC is a good steward of OAA and LGOA funding, and is accountable for programmatic budgeting, monitoring, and operation within its organization and region.
- Describe the measures in place to determine the success of the I&R/A program and to ensure reasonably convenient access to this service. These measures shall identify obtainable strategic goals to assure seniors' and adults with disabilities' needs are successfully being served.
- Describe the AAA's/ADRC's marketing strategy for I&R/A. The AAA/ADRC shall report to the LGOA detailed marketing and outreach efforts to promote their services and programs. Updates are required in the annual Area Plan update.
- Describe what efforts are made to successfully partner with nonprofit and forprofit groups, faith-based organizations, and other community groups, in order to provide the most useful information and services to clients through their I&R/A Program. Summarize the steps that the AAA/ADRC will take over the next four (4) years to improve partnering.
- Describe the AAA's/ADRC's efforts to arrange for interpretation services so that a non-English speaking caller has prompt and timely access to I&R/A services in his/her own language. The AAA/ADRC shall have a Memorandum of Agreement (MOA) with an interpretation service provided by a local college/university or other professional organization in order to facilitate and expedite the I&R/A process. The Area Plan shall include a comprehensive action plan detailing the accommodations to be made for non-English speaking constituents as required by the OAA and the LGOA.
- Describe the protocols in place for accurate and timely client intake and data input, including into OLSA.
- Describe the supervisory responsibilities for the I&R/A staff in the AAA/ADRC. The AAA/ADRC shall ensure that staff responsible for supervising the I&R/A Specialist shall be available in the AAA/ADRC office, or by some other appropriate method, during working hours of the agency to assist the regional I&R/A Specialists and/or their backups if necessary. Describe the protocols in place for when I&R/A Specialists are not available. The AAA/ADRC shall put appropriate policies in place to ensure the availability of necessary backup staff.
- Adhering to the South Carolina Aging Network's Policies and Procedures Manual, describe the protocols in place for the AAA/ADRC Director to review I&R/A data collection and reports for the planning and service area monthly. The I&R/A Specialist shall keep the AAA/ADRC Director abreast of call volume and the percentage of calls by topics. The AAA/ADRC should compare this data to the Area Plan and its Geographical Information System (GIS) mapping data. Using this data, the AAA/ADRC shall determine how to best administer, amend, and improve the I&R/A program to assure regional success.

• Describe the policies and procedures that the AAA/ADRC has in place regarding crisis calls for the I&R/A program.

#### d. Insurance Counseling and Referral Services and Senior Medicare Patrol (SMP)

Identify the long-term goals the AAA/ADRC has for Insurance Counseling and Referral Services, as well as the Senior Medicare Patrol. Summarize which weaknesses in these programs will need to be addressed in order to reach those goals. Discuss the major strengths of each program in its current configuration. Describe the volunteer efforts applied to the delivery of I-CARE services. Describe the specific goals for increasing the effectiveness of the volunteer effort. Describe the procedures that the AAA/ADRC has in place to deal with Part D enrollment. Describe in detail how the challenges in these services will be addressed during the plan period. (Provide a copy of the program reports filed for the most recently completed program year as plan Appendices E & F.)

The Area Plan shall address the following for Insurance Counseling and Referral Services and Senior Medicare Patrol (SMP):

- Describe the protocols in place to ensure that the AAA/ADRC utilizes the State Health Insurance Program (SHIP) Talk system to input insurance-related data after a contact is made with a client, successfully ensuring accuracy and timeliness.
- Describe the process in place to ensure that volunteers and staff members receive twelve (12) hours of Medicare/Medicaid update training yearly.
- Describe the process in place to identify staff members who are no longer conducting SHIP/SMP services.
- Describe the protocols in place to assist the SHIP program during high call volumes and backlogs.
- Describe the SHIP marketing strategies to reach underserved consumers, such as dual eligible consumers with mental illness and consumers in underserved counties.
- Describe the employment policy for hiring a SHIP Coordinator for a vacant position. (It is required that a coordinator's position be filled within a reasonable period.)
- Describe the protocol in place to ensure that SHIP and SMP funding are not being used to fund programs outside of SHIP and SMP areas.
- Describe the process for reviewing SHIPtalk data for integrity and quality. Data should be entered into that client's record as Dana Smith instead of D. Smith. (SHIPtalk is a federal database whereas AAAs/ADRCs are subjected to convictions and/or penalties for entering falsified information /contacts.)

#### e. Family Caregiver Support Program

Identify the long-term goals that the AAA/ADRC has for the family caregiver program related to caregivers of older adults and older relative caregivers of eligible children. Describe which weaknesses in the program will have to be addressed in order to reach those goals. Discuss the major strengths of each aspect of the program

in its current configuration. Describe what procedures that the AAA/ADRC has in place to effectively provide caregiver services within the region and how those procedures could be improved to improve efficiency. Briefly describe what challenges in family caregiver services will be addressed over the plan period? (Provide a copy of the program report filed for the most recently completed program year as plan Appendix G.)

The Area Plan shall address the following for the Family Caregiver Support Program (FCSP):

- The AAA/ADRC shall establish a Family Caregiver Support Program (FCSP) plan to include a budget, timeline, outcomes, and measures as part of its Area Plan. In the plan, the AAA/ADRC shall address the method for providing consumer choice within its planning and service area. In developing this section of the Area Plan, the AAA/ADRC shall consult with appropriate organizations, such as regional Alzheimer's Association Chapters, Community Long Term Care (CLTC) area offices, area Mental Health centers, respite care providers, Independent Living Programs (ILP), local Department of Disabilities and Special Needs (DDSN) boards, and similar organizations active in the region. The Area Plan shall assure that outreach is being conducted. The FCSP plan shall also address the needs of grandparents and older adult relatives raising children.
- Describe the policies and procedures developed to determine and document caregiver eligibility and the protocols which will be used to prioritize competing caregiver requests for services in the next four (4) years.
- The detailed specifications regarding the FCSP shall be outlined in the AAA's/ADRC's Area Plan. (The National Family Caregiver Support Program (FCSP) specifies five (5) required categories of service. Each AAA/ADRC is required to build a system which ensures that all five (5) categories of services are available throughout the planning and service area.)
- Describe the caregiver service gaps which will be addressed in the next four (4) years.
- Describe the partnerships that will be developed or expanded for the benefit of caregivers. How will the AAA/ADRC coordinate their activities with those of community agencies and voluntary organizations to expand caregiver services?
- Describe how the AAA/ADRC plans to offer new ways for caregivers to access information or services.
- Explain how the AAA/ADRC reimbursement model will continue to ensure consumer choice.
- Explain how the AAA/ADRC plans to identify and serve a higher number of individuals in priority groups designated by the OAA.
- Describe how services to grandparents and relative caregivers of children will be expanded.
- Describe how basic caregiver services are made available in all counties within the planning and service area.

#### f. Disease Prevention/Health Promotion

Describe how the AAA/ADRC will coordinate Disease Prevention and Health Promotion Services with other community agencies and volunteer organizations with similar program goals throughout the four year duration of the Area Plan.

#### VII. CHANGING DEMOGRAPHICS IMPACT ON AAA's/ADRC'S EFFORTS

This section is limited to no more than ten (10) pages.

- a. **Intervention vs. Prevention:** In this section, outline the role the AAA/ADRC plays in areas such as long term care planning, pre-retirement education, community awareness of available resources, choosing prevention, and reducing dependence on government funded services. Describe what challenges the AAA/ADRC will meet throughout the plan period, and what opportunities can be identified to implement this changing role.
- b. Senior Center Development and Increased Use: Describe what protocols and procedures the AAA/ADRC has in place to ensure that senior centers are the focal point for older adults in the community, and that these senior centers operate and provide activities and services as stipulated in the Older Americans Act (OAA). Provide details on the protocols in place to encourage senior centers to abide by the National Council on Aging's senior center requirements in order to operate fully-functioning, multipurpose senior centers within the region. Describe what training the AAA/ADRC is providing or arranging for providers/contractors to ensure creative programming, effective fundraising, and development of a long-range business plan for existing senior centers. Describe what steps the AAA/ADRC is taking to promote the programs and services available through senior centers operating in the planning and service area. Briefly explain the protocols in place to ensure that the AAA/ADRC is monitoring Permanent Improvement Project Grants to ensure reimbursement accuracy and program integrity.
- c. **Alzheimer's Disease:** In this section, the AAA/ADRC shall address how the direct services provided by the AAA/ADRC are used to advance the Alzheimer's coordination provided by the LGOA. Describe training opportunities the AAA/ADRC offers or participates in as it relates to Alzheimer's issues. Discuss how the AAA/ADRC contracts with service delivery agencies to address the need to offer services to those with Alzheimer's disease or their caregivers. Describe specific objectives for targeting services to these individuals in the Request for Proposal (RFP) or in procurement contracts.
- d. **Legal Assistance Services:** In this section describe the need for legal assistance services in the region. Elaborate on how those factors consider the requirements of the Older Americans Act (OAA) Section 307(a)(11)(A through E). This section should also show how legal assistance services are marketed in the region, what provisions are made for homebound individuals and facility residents to access legal assistance services, and what documentation the AAA/ADRC requires legal assistance providers/contractors to provide in order to determine that priority is given to legal assistance related to the issues identified in OAA Section 307(a)(11)(E).

The Area Plan shall address the following for Legal Assistance Services:

- The AAA/ADRC shall describe the eligibility of providers/contractors from whom the AAA/ADRC purchases legal assistance services. This description shall address how the selected provider/contractor meets the requirements of OAA Section 307(a)(11)(A) through (E).
- In the Legal Assistance section of the Area Plan, the AAA/ADRC shall address how it:
  - o established specific objectives for targeting appropriate populations as set forth in the OAA in the provision of legal assistance;
  - o created a plan to achieve those objectives;
  - o provided detailed reporting that documents the extent to which the AAA/ADRC met the objectives; and
  - o will collaborate with the private bar to achieve Plan objectives.

#### VIII. REGION SPECIFIC INIATIVES

This section is limited to five (5) pages and should be used to describe initiatives and innovations specific to the AAA/ADRC region, outside of the scope of the Older Americans Act (OAA) and the Lieutenant Governor's Office on Aging (LGOA). This is the AAA's/ADRC's opportunity to highlight innovation in its region.

#### IX. AREA PLAN APPENDICES

- A. PSA and AAA/ADRC Organizational Structure
- B. Regional Needs Assessment
- C. Long Term Care Ombudsman Service Report
- D. Information and Referral/Assistance (I&R/A) Report
- E. SHIP Midterm Report
- F. SMP Report
- G. Family Caregiver Report
- H. All Required Documents



# Section Seven (7)

# Appendix: 2014 – 2017 LGOA Comprehensive PSA and AAA/ADRC Area Plan Instructions Guide and Assurances

#### **Appendix Categories**

- A. PSA and AAA/ADRC Area Plan Formal Presentation
- **B.** Verification of Intent Form
- C. Verification of AoA's and LGOA's Standard Assurances and General Conditions
- D. Required Documents in the Area Plan
- E. AAA/ADRC Checklist for Area Plan



**PSA** and **AAA/ADRC** 

# Appendix A Area Plan Formal Presentation Instructions For



#### **Area Plan Formal Presentation Instructions**

Each PSA and AAA/ADRC shall be required to provide the LGOA leadership team with a formal summary of their Area Plan before the plan can be approved, or any new aging funding is awarded.

The formal presentations will be scheduled by the LGOA. The PSA Director shall be responsible for conducting the formal presentation for the Area Plan overview. Each Area Plan overview shall last no longer than one (1) hour. The presentation shall consist of a PowerPoint presentation and any handouts necessary to summarize the Area Plan overview. Following the formal presentation, the LGOA leadership team will address any questions concerning the Area Plan. Time will be available for the PSA Director and AAA/ADRC Directors to answer any questions the LGOA staff may have following the formal presentation.

The PSA Area Plan formal presentation should include, but not be limited to the following:

#### A. PSA and AAA/ADRC Operations

- 1. Provide an overview of each section of the Area Plan.
- 2. Describe the PSA's and AAA's/ADRC's commitment to providing the programs, services, and activities in its Area Plan in accordance to OAA and LGOA policies.
- 3. Describe the AAA's/ADRC's client assessment procedures.
- 4. Describe the conflict of interest procedures set by the AAA/ADRC which ensure that the same entity that conducts the assessment and chooses the client does not provide the service as well.
- 5. Describe the AAA's/ADRC's assurances for properly managing and administering its programs and services in accordance to the OAA and LGOA polices.
- 6. Briefly describe each program administered by the AAA/ADRC and its providers/contractors, as well as the qualifications according to the requirements set by the Older Americans Act and the LGOA.
- 7. Describe the protocols set by the AAA/ADRC to ensure that its group-dining sites serve at least twenty-five (25) clients daily or if a waiver is necessary because a site lacks twenty-five (25) clients daily.
- 8. Describe the protocols set by the AAA/ADRC to ensure that group-dining sites have daily activities and are open for the minimum four hours required by the LGOA.
- 9. Explain how the AAA/ADRC monitors activity calendars for each meal site to ensure that daily activities are compliant with LGOA and OAA standards.
- 10. Describe how the AAA/ADRC collaborates with other AAAs/ADRCs in South Carolina in order to improve its operations and service delivery within its region.

11. Provide a copy of the AAA's/ADRC's policies and procedures manual for complying with all of its functions as indicated by the OAA and the LGOA.

#### B. AAA/ADRC Data Collection

- 1. Describe the protocols in place for ensuring that each of the AAA's/ADRC's staff and its providers/contractors accurately input client data into the authorized LGOA client data collection system. Describe the AAA's/ADRC's policies and procedures for the Advanced Information Management (AIM) system to document and track units of services delivered. Describe what procedures the AAA/ADRC uses to certify the AIM data and to monitor that data is being inputted accurately according to procedures set by the LGOA, by the tenth (10th) day of each month. (Client data inputted into AIM must be for the site where the services were provided, and not for the entire operations for the provider/contractor.)
- 2. Demonstrate how the AAA/ADRC utilizes the On-line Support Assistant (OLSA) to record contacts, ensuring that it accurately inputs and monitors data, and provide trainings. All client contact data will be captured and immediately keyed into OLSA (preferably by an AIRS Certified Specialist) after a contact is made with a client, successfully ensuring accuracy and timeliness.
- 3. Describe the training that the AAA/ADRC provides its staff and its providers/contractors to ensure proper procedures are being followed to capture client data. This should include AIM and other client data systems used by the AAA/ADRC and providers/contractors.

#### C. AAA/ADRC Monitoring and Fiscal Oversight

- 1. Describe the PSA's and AAA's/ADRC's protocols for ensuring that each funding source has a distinct client population. A new client, who is in need of the service and meets the eligibility criteria of that funding source, will be added when such vacancies occur.
- 2. Explain how the PSA and AAA/ADRC utilizes GIS Mapping, (which shows its clients meet the requirements for at-risk clients specified by the OAA). These maps should pay particular attention to rural and low-income clients. Maps indicating where each category of at-risk senior clients reside within the counties of the planning and service area will be expected.
- 3. Provide a timetable of how often the PSA and AAA/ADRC will use GIS Mapping to analyze the clients being served in the region. Explain how GIS Mapping will ensure that those clients with the greatest needs are being served.
- 4. Describe the AAA's/ADRC's monitoring protocols. How often does the AAA/ADRC monitor its providers/contractors and what objectives and goals are being considered?
- 5. Describe the components of the unit cost for each different unit of service provided and the methodology for how the unit cost is determined. The cost justification shall include the assessment costs (fixed assessment costs), activities costs, product costs, administrative costs, and any other relevant variable that contributes to the overall rate.
- 6. Describe the protocols used by the PSA and AAA/ADRC to ensure that providers/contractors are accurately billing for service units earned.

- 7. Describe the protocols set by the PSA and AAA/ADRC to verify and certify service units earned before seeking reimbursement from the LGOA.
- 8. Describe the resources, guidance, and other tools that the PSA and AAA/ADRC provides its providers/contractors to ensure that required programs and services are being performed.
- 9. Describe the training that the PSA and AAA/ADRC provides to its providers/contractors to ensure that programs and services are being properly administered in accordance with the AoA and the LGOA.

#### D. AAA/ADRC Outreach

Describe the AAA's/ADRC's outreach efforts for increasing awareness in its region, and explain how it identifies and utilizes partners in order to better serve the seniors in that region.

#### E. AAA/ADRC Serving Older Americans Act (OAA) Targeted Populations

- 1. Describe how the AAA/ADRC reaches out to low-income, minority, rural, non-English speaking, and adults with disabilities in order to serve those populations targeted by the Older Americans Act. This should include outreach efforts through the media, internet, as well as any other measures taken.
- 2. Specifically describe the AAA's/ADRC's use of translators and interpreters to serve the growing non-English speaking population. Give an overview of the Memorandum of Agreement (MOA) the AAA/ADRC provides to those translator services.
- 3. Describe what cultural education the AAA/ADRC provides its staff and its providers/contractors to better serve the non-English speaking population.
- 4. Describe the activities that the AAA/ADRC uses to reach out to all targeted populations.
- 5. Describe the AAA's/ADRC's efforts to serve those who are visually and/or hearing impaired.

#### F. Emergency Management

- 1. Briefly describe the PSA's and AAA's/ADRC's emergency/disaster procedures.
- 2. Describe the protocols in place to identify those seniors with the greatest need to be evacuated before other individuals in the community; and what determines the status of priority seniors.
- 3. Explain how the PSA and AAA/ADRC partners with local Emergency Management Directors.
- 4. Explain who on the AAA/ADRC staff coordinates emergency preparedness response activities and who maintains updated emergency contact information for the local emergency preparedness officials, non-profit disaster relief organizations, AAA/ADRC staff, and the LGOA Emergency Preparedness Coordinator.
- 5. Provide information on how often the AAA/ADRC Emergency Coordinator attends meetings and trainings with the local EMD.
- 6. Describe the protocols and capabilities that the PSA and AAA/ADRC has in place to have an emergency operations center with computers and phones during a natural disaster or declared emergency.

- 7. Describe the process for PSA and AAA/ADRC computer records being regularly backed up so the agency can resume services immediately after an emergency, and who on staff keeps copies of the backed up records at a safe location.
- 8. Describe the relationship the AAA/ADRC has with contacts in the community for emergency preparedness and disaster relief and how the AAA/ADRC works with them. This should include, but not be limited to, the Salvation Army, American Red Cross, food banks, and United Way.
- 9. Describe what protocols the AAA/ADRC has in place to ensure that seniors continue to receive food, transportation, and other critical services until the declared emergency has ended and normal region services are resumed.
- 10. Provide information on any/all Memorandum of Agreement (MOA) with other AAAs/ADRCs regarding mutual aid provisions of staff and/or equipment to maintain operation of an AAA/ADRC impacted by an emergency or disaster.

#### G. High-Risk Providers/Contractors and Corrective Action Plans (CAP)

Describe what protocols and procedures the PSA and AAA/ADRC have set for the four-year Area Plan period in the event that a provider/contractor does not deliver services or is not capable of adhering to the terms set by the procurement contract (for example, calendars, activities, and other contracted services). Describe the process for determining a provider/contractor to be high-risk, and how Corrective Action Plans (CAPs) will be employed to correct the situation. Include specific examples of CAPs and the process used to de-designate a provider/contractor.



# Appendix B

# Verification of Intent Form (to be inserted in Area Plan Introduction)



#### 2014 – 2017 VERIFICATION OF INTENT

The Area Plan submitted for the	Region for the period of July
1, 2013 through June 30, 2017, includes all ac	tivities and services provided by the Planning
Service Area (PSA) and Area Agency on Aging (AAA	
(ADRC). The PSA and AAA/ADRC shall comply	
Americans Act (OAA), as amended and other legislati	ion that may be passed during this period
identified. The PSA and AAA/ADRC will assume ful	ll authority to develop and administer this
Area Plan in accordance with the Act and related Stat	te policy. In accepting this authority, the
PSA and AAA/ADRC assumes responsibility to deve	elop and administer this Area Plan for a
comprehensive and coordinated system of services and	d to serve as the advocate and focal point
for older persons in the planning and service area.	
This Area Plan was developed in accordance with specified under the OAA and the Lieutenant Governor' South Carolina Aging Network's Policies and Proced Notice of Grant Award's (NGA's) Terms and Condition comply with all standard assurances and general throughout the four (4) year period covered by the platthe South Carolina Lieutenant Governor's Office on Agents Agents (NGA's) and the South Carolina Lieutenant Governor's Office on Agents (NGA's) and (NGA's) and (NGA's) are supported by the platthe South Carolina Lieutenant Governor's Office on Agents (NGA's) and the Lieutenant Governor's Office on Agents (NGA's) and (NGA's) and (NGA's) are supported by the platthe South Carolina Lieutenant Governor's Office on Agents (NGA's) and (NGA's) are supported by the platthe South Carolina Lieutenant Governor's Office on Agents (NGA's) are supported by the platthe South Carolina Lieutenant Governor's Office on Agents (NGA's) are supported by the platthe South Carolina Lieutenant Governor's Office on Agents (NGA's) are supported by the platthe South Carolina (NGA's) are supported by the South Carolina (NG	's Office on Aging (LGOA), including the dures Manual and the LGOA Multigrant ons. The PSA and AAA/ADRC agrees to conditions submitted in the Area Plan n. This Area Plan is hereby submitted to
The PSA responsible for overseeing the provision of Aging Servi	A and AAA/ADRC certifies that it is ices throughout the
region. This responsibility includes, but is not limited t	
1 Contract management	

- 1. Contract management
- 2. Programmatic and fiscal reporting activities
- 3. Oversight of contracted service delivery
- 4. Coordination of services and planning with the LGOA, service contractors, and other entities involved in serving and planning for the older population in the planning and service area
- 5. Provision of technical assistance and training to providers/contractors and other interested
- 6. Provision of public information and advocacy related to aging program activities and issues

# 2014 – 2017 LGOA Comprehensive PSA and AAA/ADRC Area Plan Instructions Guide and Assurances

Date	Signature of Executive Director Planning Service Area (PSA)
Date	Signature of Aging Unit Director
The Area Agency Adviso	ory Council has reviewed and approved this Area Plan.
Date	Signature of Chair, Area Agency Advisory Council
Date The Governing Board of	



# APPENDIX C

# 2014 – 2017 AREA PLAN VERIFICATION OF ADMINISTRATION ON AGING'S (AoA'S) AND LIEUTENANT GOVERNOR'S OFFICE ON AGING'S (LGOA'S) STANDARD ASSURANCES AND GENERAL CONDITIONS



# 2014 – 2017 AREA PLAN VERIFICATION OF ADMINISTRATION ON AGING'S (AoA'S) AND LIEUTENANT GOVERNOR'S OFFICE ON AGING'S (LGOA'S) STANDARD ASSURANCES AND GENERAL CONDITIONS

#### **ASSURANCE CATEGORIES**

- A. PLANNING AND SERVICE AREA (PSA) AND AREA AGENCY ON AGING (AAA)/AGING AND DISABILITY RESOURCE CENTER (ADRC) GENERAL AND ADMINISTRATIVE ASSURANCES
- B. AAA/ADRC TRAINING RESOURCES ASSURANCES
- C. CLIENT DATA COLLECTION ASSURANCES
- D. FISCAL ASSURANCES
- E. MONITORING AND COMPLIANCE ASSURANCES
- F. PROCUREMENT AND CONTRACTUAL ASSURANCES
- G. COORDINATION, OUTREACH, AND INFORMATION AND REFERRAL ASSURANCES
- H. STATE PLAN ASSURANCES FROM THE ADMINISTRATION ON AGING (AoA)

#### 2014 – 2017 AREA PLAN ASSURANCES

- A. PLANNING AND SERVICE AREA (PSA) AND AREA AGENCY ON AGING (AAA)/AGING AND DISABILITY RESOURCE CENTER (ADRC) GENERAL AND ADMINISTRATIVE ASSURANCES
  - 1. The Planning Service Area (PSA), Area Agency on Aging (AAA)/Aging and Disability Resource Center (ADRC), and the AAAs'/ADRCs' providers/contractors must comply with the policies and procedures set by the Older Americans Act (OAA), the current South Carolina Aging Network's Policies and Procedures Manual, current Notices of Grant Award (NGA) Terms and Conditions, and any Program Instructions (PI) issued by the Lieutenant Governor's Office on Aging (LGOA) and the Administration on Aging (AoA) during the Area Plan period.
  - 2. The AAA/ADRC shall ensure that each activity undertaken by the agency, including planning, advocacy, and systems development, shall include a focus on the needs of low income minority older individuals and older individuals residing in rural areas. (OAA 306(a)(4)(C))
  - 3. The PSA, AAA/ADRC, and the AAAs'/ADRCs' providers/contractors shall comply with all applicable Federal and State laws, regulations, and guidelines.

- 4. The PSA and AAA/ADRC shall have a comprehensive, written policies and procedures manual for complying with all of its functions as prescribed by the OAA, the LGOA, and the South Carolina Aging Network's Policies and Procedures Manual. These written policies and procedures shall be available for inspection upon request and are subject to the South Carolina Freedom of Information Act (FOIA) requirements. The AAA/ADRC may not adopt the South Carolina Aging Network's Policies and Procedures Manual as a substitute for developing a regional manual, but may use it as a guide for what should be included in the regional manual. A summary of the written policies and procedures should be noted in the Area Plan.
- 5. The AAA/ADRC accepts the standards and programmatic requirements issued for all services authorized by the Lieutenant Governor's Office on Aging. All providers/contractors and/or vendors of services shall be monitored for compliance with such standards and carry out the standards and requirements in the delivery of each service to be reimbursed with funds awarded under this plan.
- 6. The PSA and AAA/ADRC shall maintain professional office policies and procedures which reflect effective (best) business practices in order to ensure the quality delivery of programs and services to South Carolina's aging population and adults with disabilities.
- 7. The AAA/ADRC shall provide a qualified full-time director of the aging unit and an adequate number of qualified staff to carry out the functions required under the Area Plan. (CFR 1321.55(b))
- 8. The AAA/ADRC shall maintain a Regional Aging Advisory Council (RAAC) whose purpose is:
  - a. to advise the AAA/ADRC on all matters related to the development of the Area Plan;
  - b. to advise on the administration of the plan; and
  - c. to advise on operations conducted under the plan.
  - The RAAC shall have no decision-making authority that is binding on the AAA/ADRC staff or on the AAA/ADRC Executive Board. (OAA 306(a)(6)(D))
- 9. Through its Area Plan, the AAA/ADRC shall provide the LGOA information on how board members are selected, appointed, or elected; the established terms of office; and RAAC by-laws.
- 10. The PSA and AAA/ADRC directors shall be expected to be engaged and informed aging advocates who work to promote senior matters and educate the community on issues facing the aging network and their respective regional AAA/ADRC.
- 11. Each PSA are encouraged to have at least one (1) board meeting annually that is dedicated to aging issues and shall invite the LGOA Director and senior staff to attend.
- 12. All Planning Service Area (PSA) Directors are required to attend quarterly and scheduled PSA Directors' meetings at the LGOA, or to send an appropriate representative, approved by the LGOA Director.
- 13. All AAA/ADRC Directors are required to attend monthly and scheduled ADRC meetings or to send an appropriate representative, approved by the LGOA Director.

- 14. PSA Directors and their governing board members shall be encouraged to provide a minimum of six (6) hours of community service annually in their region. Options for community service may be conducted through, but not limited to, working at a group meal site; delivering home-delivered meals; or volunteering in an adult day care, assisted living facility, or a multipurpose senior center. The desired goal of this community service is for the PSA leaders to see firsthand the many challenges and obstacles facing older persons, persons with disabilities, and their families and caregivers and to seek solutions in order to improve the aging network in their regions.
- 15. The PSA director shall ensure that all contact information for all respective PSA board members provided to the LGOA is accurate and up-to-date and comply with the South Carolina Freedom of Information Act (FOIA).
- 16. The AAA/ADRC shall use grants made under the Older Americans Act (OAA) to pay part of the cost of the administration of the Area Plan, including preparation of plans, evaluation of activities carried out under such plans, development of a comprehensive and coordinated system for delivery of services to older adults and caregivers, development and operation of multipurpose senior centers, and the delivery of legal assistance as required under the OAA of 1965, as amended in 2006, and in accordance with the regulations, policies, and procedures established by the LGOA, the Assistant Secretary of the AoA, the Secretary of the U.S. Department of Health and Human Services and State legislation. (OAA 303 (c) (1) and (2) and CFR 1321.11)
- 17. The AAA/ADRC shall assure through the Area Plan that it has protocols in place to provide technical and programmatic assistance and training opportunities for AAA/ADRC staff and providers/contractors as required by the South Carolina Aging Network's Policies and Procedures Manual.
- 18. The AAA/ADRC is responsible for designing and implementing a regional training and education plan. This plan should be comprehensive in nature and reflect the training requirements identified by the AAA/ADRC, address the service priorities in the Area Plan, and complement State efforts. The training should address geographical characteristics, demographics, infrastructure, GIS Mapping, and local and community partnering resources. The annual needs assessment is the blueprint necessary to identify the types of trainings necessary in the region. Regional training shall also address all required LGOA client data tracking systems, as well as any other fiscal or programmatic requirements of the LGOA.
- 19. The AAA/ADRC and providers/contractors shall not means test for any service under Title III. When contributions are accepted, or cost sharing implemented, providers/contractors shall not deny services to any individual who does not contribute to the cost of the service. (OAA 315(b)(3) and CFR 1321.61(c))
- 20. The AAA/ADRC shall comply with Title VI of the Civil Rights Act of 1964 and shall require such compliance from all providers/contractors under the Area Plan. (CFR 1321.5(c))

- 21. The AAA/ADRC shall comply with all the appropriate Titles of the Americans with Disabilities Act of 1990, require such compliance from all contractors under the Area Plan, and assure that otherwise eligible older individuals shall not be subjected to discrimination under any program or activity under the Area Plan. (CFR 1327.5 and 1321.5 (c))
- 22. The AAA/ADRC shall assure that residency or citizenship shall not be imposed as a condition for the provision of services to otherwise qualified older individuals.
- 23. The AAA/ADRC shall assess the level of need for supportive services including legal assistance, transportation, nutrition services, and multipurpose senior centers within the planning and service area. (OAA 306(a)(1))
- 24. The AAA/ADRC shall assure that the special needs of older individuals residing in rural areas are taken into consideration and shall describe in the Area Plan how those needs have been met and how funds have been allocated to services to meet those needs. (OAA 307(a)(10))
- 25. The AAA/ADRC shall utilize Geographic Information System (GIS) mapping in order to determine if Older Americans Act (OAA) targeted client populations are being served in its planning and service areas.
- 26. The AAA/ADRC shall establish effective and efficient procedures for coordination of entities conducting programs under the OAA and entities conducting other Federal programs for older individuals at the local level. (OAA 306(a)(12))
- 27. Where there are an identifiable number of older individuals in the PSA who are Native Americans, the AAA/ADRC shall require outreach activities to such individuals and encourage such individuals to access the assistance available under the OAA. (OAA 306(a)(6)(G))
- 28. The AAA/ADRC shall assure the coordination of planning, identification and assessment of needs, and provision of services for older individuals with disabilities, (with particular attention to those with severe disabilities) with agencies that develop or provide services for individuals with disabilities. (OAA 306(a)(5))
- 29. The AAA/ADRC, in carrying out the State Long Term Care Ombudsman program, shall expend not less than the total amount of funds appropriated and expended by the agency in fiscal year 2000 in carrying out such a program under the OAA. (OAA 306(a)(9))
- 30. The AAA/ADRC, when seeking a waiver from compliance with any of the minimum expenditures for priority services, shall demonstrate to the LGOA that services furnished for such category within the PSA are sufficient to meet the need for those services and shall conduct a timely public hearing upon request. (OAA 306(b))
- 31. The AAA/ADRC shall, to the maximum extent practicable, coordinate services under the Area Plan with services that may be provided under Title VI in the planning and service area. (OAA 306(a)(11)(B) and (C))

- 32. The AAA/ADRC shall ensure that clients receive an initial assessment and then reassess service recipients no less than annually, with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, older individuals residing in rural areas, and eligible individuals, as defined in the Older Americans Act of 1965 (OAA) §518, 42 U.S.C. §3056p, as amended in 2006. Assessments must be recorded on the LGOA Assessment Form. No reimbursements will be made without proper and current assessments.
- 33. Based on that assessment, the AAA/ADRC shall assure that services delivered with resources under the Area Plan are provided to individuals with the highest priority scores.
- 34. Assessed individuals who must be terminated because of low priority scores shall be provided an opportunity to continue to receive services as a private pay recipient or as a partial-pay recipient subsidized through local resources, if available.
- 35. The LGOA requires that the AAA/ADRC directly provide ombudsman, information and assistance, insurance counseling, and family caregiver services. (OAA 307(a)(8)(A)and(C))
- 36. The AAA/ADRC shall provide other direct services, only with a waiver approved by the State agency, and only when such direct provision is necessary to assure an adequate supply of such services, or where such services are directly related to the AAA's/ADRC's administrative functions, or where such services of comparable quality can be provided more economically by the AAA/ADRC. (OAA 307(a)(8)(A)and(C))
- 37. The AAA/ADRC shall administer the nutrition programs with the advice of a dietitian (or an individual with comparable expertise). Whenever the AAA/ADRC allows providers/contractors to purchase catered meals directly, or has providers/contractors who prepare meals on site, the AAA/ADRC shall assure that such providers/contractors have agreements with a registered dietitian who provides such advice. (OAA 339(G))
- 38. The AAA/ADRC shall conduct efforts to facilitate the coordination of community-based, long-term care services, pursuant to section 306(a)(7), for older individuals who:
  - a. reside at home and are at risk of institutionalization because of limitations on their ability to function independently;
  - b. are patients in hospitals and are at risk of prolonged institutionalization; or
  - c. are patients in long-term care facilities, but who can return to their homes if community-based services are provided to them. (OAA 307(a)(18))
- 39. The AAAs/ADRCs are responsible for developing emergency/disaster preparedness and response plans for their planning and service area regions that are updated and reviewed annually. These plans should incorporate all requirements of the South Carolina Aging Network's Policies and Procedures Manual regarding Emergency Management and Disaster Preparedness.
- 40. In addition, the AAA/ADRC shall ensure that each of its providers/contractors has a disaster preparedness plan that is reviewed and updated annually.
- 41. AAAs/ADRCs shall meet with county emergency management directors in their regions to ensure that there is a working relationship between the counties and the

- AAAs/ADRCs. AAAs/ADRCs are expected to maintain current and up-to-date emergency contact information for AAA/ADRC staff, directors of providers/contractors, and county emergency management officials in the event of a disaster or emergency, and submit this information with their Area Plans. The AAA/ADRC will designate staff to be on call throughout the duration of the declared disaster and this staff shall maintain communications with the LGOA Emergency Preparedness Coordinator.
- 42. The AAA/ADRC must ensure that lists of clients compiled under any programs or services are used solely for the purpose of providing or evaluating services. AAAs/ADRCs shall obtain written assurance from providers/contractors stating that they will comply with all LGOA confidentiality requirements, as well as any and all applicable Federal and State privacy and confidentiality laws, regulations, and policies. The AAA/ADRC shall provide the LGOA with confidentiality assurances through its Area Plan, annual Area Plan updates, or as changes are made.
- 43. The AAA/ADRC and its providers/contractors under the grant must have written procedures for protecting the identifying client information against unlawful distribution through any means, physical or electronic. All identifying client data must be protected through limited access to electronic records. Each employee with access to identifying client information must sign a notice prepared by the grantee specifying the requirement to maintain confidentiality and the penalty for failure to comply.
- 44. Individually identifiable health information is to be protected in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Pub. L. No. 104-191, 110 Stat. 1936.
- 45. Each AAA/ADRC shall meet with its provider(s)/contractor(s) to discuss questions, concerns, obstacles, and/or technical assistance required to be successful, either in group or one-on-one sessions. A summary of these meetings shall be maintained on file. Issues raised, and any resolutions achieved, in these meetings shall be addressed in the quarterly AAA/ADRC and providers/contractors meetings.
- 46. Each AAA/ADRC shall host a quarterly regional meeting with its providers/contractors. At a minimum, each quarterly meeting shall address the following topics:

#### **Quarter One:**

- AAA/ADRC Area Plan;
- Needs assessment;
- Comparison of service delivery to GIS mapping to ensure that all clients with the greatest needs within the entire county are being served;
- Challenges in business operations (what is working and what isn't working);
- Training requests and topics for providers/contractors;

#### **Quarter Two:**

- Career development;
- Continuing education training or Continuing Education Units (CEU);
- Educational workshops; and
- Other issues and concerns.

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<ul> <li>Best practices;</li> <li>AAA/ADRC goals and mission for the year; and</li> <li>Other issues and concerns.</li> </ul>	
<ul> <li>Quarter Three:         <ul> <li>Modernizing operations;</li> <li>Community resources and new partnerships;</li> <li>Aging focus;</li> <li>Business development; and</li> <li>Other issues and concerns.</li> </ul> </li> </ul>	<ul> <li>Quarter Four:         <ul> <li>End of year Area Plan review;</li> <li>Strategic planning and forecasting session for specific regional needs and concerns;</li> <li>Analyzing end of the year data (comparing data to the GIS mapping that the AAAs/ADRCS are required to provide to the LGOA); and</li> <li>Other issues and concerns.</li> </ul> </li> </ul>

- 47. The following constitutes a substantial change in the approved Area Plan and requires an amendment to the Area Plan:
  - a. change or termination of a service contractor;
  - b. reduction in the funding for priority services procured; and/or
  - c. loss or change in the services available in any county in the region.

#### B. AAA/ADRC TRAINING RESOURCES ASSURANCES

- The AAA/ADRC shall appoint an AAA/ADRC Training Liaison for its planning and service area region. This liaison shall serve as the LGOA point of contact for AIM operations in its region. The liaison shall provide program overview information for AAA/ADRC providers/contractors for general aging network structure and operations. In addition, his/her primary role shall be to assure earned service units and client data are being captured, tracked, and reconciled in the AIM system for reimbursement.
- 2. The AAA/ADRC Training Liaison shall have a firm understanding of programmatic operations and overall knowledge of finance and accounting operations for the aging network. The AAA/ADRC shall appoint the person within the AAA/ADRC who provides quality assurance and reconciliation of the provider/contractor invoices for OAA services in the AAA/ADRC region. (Note: The best candidate may be the financial manager and/or accounting reimbursement officer/manager. This person should have a strong working relationship with the person authorized to approve payment of funds to the provider/contactor for service units earned.) The liaison shall be responsible for assuring that the AAA's/ADRC's providers/contractors are appropriately tracking service units earned in the AIM system for all OAA funds.
- 3. The AAA/ADRC Training Liaison shall train new providers/contractors, field questions in the region, and provide assistance with challenges of the AIM tracking system. The

liaison shall be the only person authorized to make contact with the LGOA AIM Coordinator. On the rare occasion that the liaison cannot assist the provider/contractor, he/she may contact the LGOA AIM Coordinator for assistance. The liaison shall be responsible for forwarding the information received from the AIM Coordinator to the providers/contractors. The liaison shall be the point of contact for providers/contractors needs and shall ensure accurate, quality tracking, and monitoring for reimbursement of OAA services, prior to billing the LGOA.

- 4. The AAA/ADRC shall assure on-going training within its region of operation for its providers/contractors. At a minimum, the AAA/ADRC shall do the following:
  - assure that a minimum one monthly e-mail is disseminated to their providers/contractors regarding a variety of aging issues, including but not limited to outreach opportunities, outreach events, national initiatives, activity development, resources, etc.
  - host an aging orientation meeting within the first thirty (30) days of a new contract agreement for all new providers/contractors in their region. Materials provided in the orientation shall include, but are not limited to, the following:
    - o a general overview of the LGOA and ADRC network operations and roles;
    - o a LGOA two-sided flyer;
    - o a LGOA benefits guide;
    - o a SC Access flyer;
    - o a copy of the AAA/ADRC Area Plan;
    - o a copy of the SC Aging Network's Policies and Procedures Manual;
    - o a summary of structure of the aging network in South Carolina;
    - o a copy of general AAA/ADRC goals for that operating year;
    - o an AAA/ADRC staffing contact sheet; and
    - o a copy of the AAA/ADRC Strategic Plan.
- 5. The AAAs/ADRCs shall assure that an Advanced Information Manager (AIM) training session is provided by the AAA/ADRC Training Liaison and an operation manual shall be given to the new provider/contractor within the first thirty (30) days of a new contract agreement.

#### C. CLIENT DATA COLLECTION ASSURANCES

- 1. The AAA/ADRC and its providers/contractors will utilize the Advanced Information Management (AIM) system to document and track units of services delivered. Reimbursements for service funds will be supported by client data correctly entered into AIM. The AAA/ADRC will assure that service providers/contractors are trained properly and monitored accordingly, and that AIM data is inputted monthly by the tenth (10th).
- 2. The AAA/ADRC shall ensure that each group dining site uses the LGOA approved LG-94 sign-in sheet and that each client sign his/her name or make a mark on the sign-in sheet daily. In addition, home-delivered meal drivers must sign and date a document daily listing their clients and certifying that the meals were delivered. The provider/contractor dining manager will sign and date that document after the driver has returned to the operational site.

- 3. The AAA/ADRC shall utilize On-line Support Assistant (OLSA) to record contacts. The AAA/ADRC shall accurately input and monitor data, and provide training for appropriate AAA/ADRC staff and providers/contractors. All client contact data will be captured and immediately keyed into OLSA (preferably by an AIRS Certified Specialist) after a contact is made with a client, successfully ensuring accuracy and timeliness.
- 4. The AAA/ADRC shall utilize the State Health Insurance Program (SHIP) Talk system to input insurance-related data after a contact is made with a client, successfully ensuring accuracy and timeliness.

#### D. FISCAL ASSURANCES

- 1. The PSAs and AAAs/ADRCs shall be good stewards of OAA and LGOA funding and be accountable for programmatic budgeting, monitoring, and operation. The AAA/ADRC shall assure in writing, through its Area Plan, that I&R/A funding is not being used to fund other programs outside of the I&R/A program area. Should the LGOA determine the AAA/ADRC is in violation of using I&R/A funds for other activities, then funding for I&R/A services may be withheld in the future.
- 2. The PSA and AAA/ADRC shall provide satisfactory assurance that such fiscal control and accounting procedures shall be adopted as may be necessary to assure proper disbursement of, and accounting for, Federal and State funds paid under the Area Plan to the AAA/ADRC, including funds paid to the recipients of grants or contracts. (OAA 307(a)(7)(A))
- 3. The AAA/ADRC shall assure that funds received under the OAA shall supplement and not supplant any Federal, State, or local funds expended to provide services allowable under Title III. (OAA 321(d))
- 4. Each funding source shall have a distinct client population for the duration of the contract period or until the client's service is terminated. A new client, who is in need of the service and meets the eligibility criteria of that funding source, will be added when such vacancies occur.
- 5. The PSAs and AAAs/ADRCs shall include as part of their Area Plans, a breakdown of the components of the unit cost for each different unit of service and the methodology showing how the unit cost is determined. The cost justification shall include the assessment costs, activities costs, product costs, administrative costs, and any other relevant variable that contributes to the overall rate.
- 6. The AAA/ADRC shall ensure that it has a process in place to verify how the provider's/contractor's unit costs are determined and that the units are being earned.
- 7. All invoices and financial and program reports must be submitted in the format provided by the LGOA and on the schedule(s) set by the LGOA. Invoices and financial reports shall be submitted to the Accounting and Finance Division, while program reports will be submitted to the appropriate program manager as stipulated by the LGOA.
- 8. The AAA/ADRC shall submit a total aging budget, disclose all sources and expenditures of funds that the AAA/ADRC receives or expends to provide services to older

- individuals, and the cost allocation plan, or approval of the indirect cost rate from the funding agency, used to prepare such budget. (OAA 306(a)(13)(E))
- 9. The AAA/ADRC shall expend all prior year's funds first, before expending any new funds.
- 10. Planning and Administration funds for Titles III-B, III-C, III-C-2, and III-E must be expended before any program development of III-E service funds are expended for subgrantee staff activities or internal operations.
- 11. The AAA/ADRC shall assure that any funds received under the Area Plan, or funds contributed toward the non-Federal share, shall be used only for activities and services to benefit older individuals and others specifically provided for in Title III of the OAA or in State legislation. This shall not be construed as prohibiting the AAA/ADRC from providing services by using funds from other sources. (OAA 301 (d))
- 12. The LGOA requires that AAAs/ADRCs shall maintain proper records with all necessary supporting documents. Such records must be in a form, approved by the LGOA, which provides an accurate and expeditious determination of the status of all Federal and non-Federal funds at any time; including the disposition of funds received and the nature and amount of all expenditures and obligations claimed against OAA and State allotments. The AAA/ADRC shall enter the liability for the local matching funds in the appropriate accounts when payment is requested from the LGOA. The AAAs/ADRCs shall assure the LGOA that all funds requested for payment shall be for service units and services actually provided and earned by the providers/contractors. The AAAs/ADRCs shall provide and maintain written assurances through their Area Plans and annual updates to monitor and audit the payment requests for accuracy and integrity purposes.
- 13. Any AAA/ADRC that expends a total of \$500,000 or more in Federal awards must monitor delivery and have an audit that complies with OMB Circular A-133. The audit shall be submitted to the LGOA within nine (9) months after the close of the organization's fiscal year.
- 14. The AAA/ADRC shall consult with relevant service providers/contractors and older individuals to determine the best method for accepting voluntary contributions that comply with the Cost Sharing policies of the LGOA and the OAA, as amended in 2006. (OAA 315(b)(2))
- 15. The AAA/ADRC shall assure that any revenue generated from voluntary contributions or cost sharing shall be used to expand the services for which such contributions or co-pays were given. (OAA 315(a)and(b))
- 16. The voluntary contributions system adopted shall be clearly explained to individuals who use the agency's services. The explanation shall be made both verbally and in writing at the time service delivery is arranged; and shall be posted in a conspicuous location accessible to clients within the site. The explanation shall include the voluntary nature of the contribution, confidentiality policies, and how contributions are collected and used. The AAA/ADRC shall ensure that this is included in procurement contracts and each provider's/contractor's policy shall be included in the AAA's/ADRC's Area Plan annual

update.

- 17. The AAA/ADRC shall assure that amounts expended for services to older individuals residing in rural areas shall not be less than the amounts expended for such services in fiscal year 2000. (OAA 307(a)(3)(B))
- 18. The AAA/ADRC shall assure that the AAA/ADRC and all its providers/contractors meet all matching requirements for funds awarded under the Area Plan.
- 19. The AAA/ADRC shall assure that any funds received from the State for Cost of Living Adjustment shall be used for personnel costs only.
- 20. The AAA/ADRC shall submit an independent audit to the Lieutenant Governor's Office on Aging (LGOA), Division of Finance and Accounting, within 180 days after the close of the project year.
- 21. A final financial report for the grant period shall be submitted to the LGOA, within forty-five (45) days of the close of each State fiscal year in the grant period (August 14) or within forty-five (45) days of the last payment made, whichever occurs first.
- 22. The AAA/ADRC shall assure that funds received for Nutrition Services Incentive Program (NSIP) shall be used only for the purchase of United States agricultural commodities or commercially prepared meals served in the Title III-C services and that NSIP funds shall be distributed throughout the region based on the percentage of eligible meals served by each provider/contractor. (OAA 311(d)(2))
- 23. The AAA/ADRC shall not use funds received under the OAA to pay any part of a cost, including an administrative cost, incurred to carry out a contract or commercial relationship that is not carried out to implement the OAA. (OAA 306(a)(14))

#### E. MONITORING AND COMPLIANCE ASSURANCES

- 1. The PSA Director and AAA/ADRC Director shall ensure that providers/contractors are earning their units in accordance with the OAA and LGOA policies.
- 2. The AAA/ADRC shall ensure that anyone compensated by an AAA/ADRC or provider/contractor cannot be counted as a service unit earned. When monitoring aging services, the AAA/ADRC must match service clients with a list of AAA/ADRC and provider/contractor employees to ensure funding and programmatic integrity.
- 3. The AAA/ADRC shall assure that no group dining facility shall be funded unless an average of twenty-five (25) eligible participants attends daily. All group dining sites must serve at least twenty-five (25) clients per day or request a LGOA Group Dining Waiver.
- 4. The AAA/ADRC shall assure that an OAA III C-2 home delivered meal shall be delivered to a participant for no less than five days a week unless it is documented that the participant is receiving meal(s) from another source. Further, in addition to federal eligibility requirements, special consideration shall be given to those eligible clients living alone, those in isolated rural areas, and those seventy-five (75) years of age or

older. (OAA 336)

- 5. Each AAA/ADRC shall be provided copies of the group dining site activity calendars from the group dining providers/contractors monthly for approval. The AAAs/ADRCs shall scan and forward by email copies of approved monthly site activity calendars to the LGOA Policy and Planning Manager by the close of business on the last business day of the month.
- 6. As a means of monitoring for quality assurance, the AAA/ADRC Director, or designated appointee, shall personally deliver a minimum of three (3) home-delivered meals from three (3) different home-delivered meal routes monthly. Any issues that arise from these monitoring visits shall be corrected within three (3) business days. A monthly report of these home visits, including the name of the staff member making the visit, shall be provided in writing to the LGOA during the monthly AAA/ADRC Directors' meeting. In the report, the AAA/ADRC Director shall guarantee that all services contracted with the provider/contractor, which are to be reimbursed by the LGOA, are in fact being provided according to OAA and LGOA standards. The AAA/ADRC shall use the Monthly Home-Delivered Meal Monitoring Form provided by the LGOA to report the home monitoring visits.
- 7. The AAA/ADRC Director, or their designee, shall visit at least three (3) group dining sites monthly and provide the LGOA with a written report summarizing each visit. In the summary, the AAA/ADRC Director shall assure that all services contracted by the provider/contractor, and being reimbursed by the LGOA, are being provided.

#### F. PROCUREMENT AND CONTRACTUAL ASSURANCES

- 1. Service procurement contracts must incorporate all components of the South Carolina Aging Network's Policies and Procedures Manual. Through the direction of the South Carolina Aging Network's Policies and Procedures Manual, each of the PSA's procurement contracts for aging services shall be based on meeting the unique regional needs of each planning and service area.
- 2. The PSA and AAA/ADRC shall require all programs funded under the Area Plan to be operated fully in conformance with the LGOA and all applicable Federal, State and local fire, safety, health and sanitation standards or licensing prescribed by law or regulation. (CFR1321.75(a))
- 3. The PSA and AAA/ADRC shall contract only with service delivery agencies that shall provide to the AAA/ADRC all program information and reports required by the Lieutenant Governor's Office on Aging. Provision of timely and correct data shall be in a format and contain such information as the LGOA may require the AAA/ADRC to submit. (OAA 307(a)(6))
- 4. All PSA and AAA/ADRC Requests for Proposal (RFP) shall provide direction, coordination, and planning in the fulfillment of contractual agreements with providers/contractors.

- 5. All contractual agreements must include a procedure for the resolution of grievances or concerns between the Planning Service Area (PSA), AAA/ADRC, and provider/contractor.
- 6. When there is grievance between the AAA/ADRC and a provider/contractor, all efforts shall be made by the AAA/ADRC to resolve the issue. Minimal contact should be made at the State level and only after all attempts have failed to resolve the issues locally. The Lieutenant Governor's Office on Aging (LGOA) shall serve only as a source of information to the AAA/ADRC regarding the resolution process. All grievances shall be handled by the AAA/ADRC and provider/contractor unless the grievance includes illegal, immoral, and/or unethical behavior, at which time the LGOA and proper authorities shall be notified. If the AAA/ADRC wants to include the LGOA, or cannot work out the issue, then the LGOA may be contacted to assist with the resolution process through guidance only.
- 7. The PSA and AAA/ADRC must advertise the Request for Proposal (RFP) in legal ads in newspapers throughout the region and post information in a prominent spot on its website at least thirty (30) days before the release of the RFP. The AAA/ADRC shall notify the LGOA Policy Manager so that the RFP can be posted on the LGOA web site.
- 8. The PSA and AAA/ADRC shall include in each solicitation for providers/contractors of any service under the OAA, a requirement that the applicant will:
  - a. Specify how the organization intends to satisfy the service needs of low income minority individuals and older individuals residing in rural areas;
  - b. Provide services to low income minority individuals in accordance with their need for such services;
  - c. Meet specific objectives set by the AAA/ADRC, for providing services to low income minority individuals; (OAA 306(a)(4)(A))
  - d. Make a good faith effort to obtain a client consent form from all service recipients to allow their information to be included in AIM for research and advocacy purposes.
  - 9. All contracts for the procurement of services or goods which are supported with financial assistance through the LGOA, must adhere to applicable Federal and State procurement codes (COG: OMB Circulars A102 and A-87) (PN-P: OMB Circulars A110 and A-122).
  - 10. The AAA/ADRC and providers/contractors shall have the Knowledge, Skills and Abilities (KSA) to use professional practices of performing, reporting, tracking, and administering their Older American Act (OAA) and State funding, and this should be reflected in all procurement contracts and RFPs.
  - 11. The PSA and AAA/ADRC shall have legal representation on their RFP (Request for Proposal) Board.
  - 12. The PSA and AAA/ADRC shall host a pre-RFP application informational meeting for potential providers/contractors three weeks following the public release of the RFP to explain the RFP process and aging network policies/procedures and to answer

- questions about the RFP. The date, time, and location of the meeting shall be included in the RFP packet. This shall assure fairness in the bid process. Opportunities for submitting written questions shall be provided by the AAA/ADRC before the pre-application meeting.
- 13. Prior to engaging in a contract, the PSA and AAA/ADRC shall assure through the RFP bid and contract that the provider/contractor has the necessary equipment, technology, software, and trained staff to operate in a professional manner and to execute or administer the duties.
- 14. An AIM Operational Manual shall be provided at the start of the bid process so that providers/contractors know what is expected in advance if the provider/contractor gets the contract.
- 15. The PSA and AAA/ADRC shall provide all potential providers/contractors with an overview of the LGOA organization and procurement process before submitting a bid for contract in order that they understand the proper procedures and policies.
- 16. The AAA/ADRC shall encourage each group dining provider to be a member of the National Council on Aging (NCOA) / National Institute of Senior Centers (NISC) or to operate according to NISC's national standards for senior centers and group dining sites.
- 17. The AAA/ADRC shall require, through the procurement contract, that the provider's/contractor's representative attend quarterly regional meetings. This representative shall be required to take the information provided and disseminate it appropriately and incorporate it into his/her organization immediately.
- 18. If the AAA/ADRC finds that a provider/contractor under the Area Plan has failed to comply with the terms of the contract or with Federal or State laws, regulations and policies, the AAA/ADRC may withhold that portion of the reimbursement related to that failure to comply. The Regional Aging Advisory Council (RAAC) shall recommend appropriate procedures for consideration by the Governing Board of the AAA/ADRC. (OAA 306(e)(1))
- 19. In the event that the PSA and AAA/ADRC finds that a provider/contractor has failed to comply with the terms of the contract or is unable to deliver services as contracted, the AAA/ADRC should initiate a thirty (30) day Corrective Action Plan (CAP) to resolve the issue. If the issue cannot be resolved the AAA/ADRC may determine the provider/contractor high-risk, in accordance with the South Carolina Aging Network's Policies and Procedures Manual.
- 20. The AAA/ADRC shall afford providers/contractors due process, such as that described for AAAs/ADRCs in OAA Section 306(f)(2)(B) before making a final determination regarding withholding providers'/contractors' reimbursements.
- 21. Electronic copies of procurement contracts and all amendments thereto, shall be provided to the LGOA's Policy and Planning Manager within thirty (30) days of execution or as amended.

- 22. The AAA/ADRC agrees to comply with the "Debarment and Suspension" terms and conditions of 45 C.F.R. § 92.35 or 45 C.F.R. § 74.13 as applicable to the AAA/ADRC and/or provider/contractor.
- 23. The AAA/ADRC shall only purchase services from providers/contractors that will provide the LGOA with all requested data in the format necessary to document the outcome of services purchased.
- 24. The AAA/ADRC shall assure that any facility authorized for use in programs operated under the Area Plan shall have annual certification that the facility complies with the appropriate fire, safety and sanitation codes. (CFR 1321.17(4))
- 25. The AAA/ADRC shall assure that a facility purchased for use as a multi-purpose senior center with OAA or State Permanent Improvement funds, shall continue to be used for the same purpose for not less than ten (10) years after acquisition, or twenty (20) years after construction.
- 26. Prior to authorizing use of OAA or State Permanent Improvement funds for renovation, purchase or construction, the AAA/ADRC shall require assurance from the grantee that funding is, and shall continue to be, made available for the continued operations of these senior centers. (OAA 312)
- 27. The AAA/ADRC shall assure that group dining service facilities are located in as close proximity to the majority of eligible individuals' residences as feasible. Particular attention shall be given to the use of multipurpose senior centers, churches, or other appropriate community facilities for such group dining service. (OAA 339(E))
- 28. When possible, the AAA/ADRC shall enter into arrangements and coordinate services with organizations that are Community Action programs and meet the requirements under section 675(c)(3) of the Community Services Block Grant Act. (42 U.S.C.9904(c)(3)) and (OAA 306(a)(6)(C))
- 29. The AAA/ADRC shall take into account, in connection with matters of general policy arising in the development and administration of the Area Plan, the views of recipients of services under the Area Plan. (OAA 306(a)(6)(A))
- 30. Where possible, the AAA/ADRC shall enter into arrangements with organizations providing day care services for children or adults, and respite for families, to provide opportunities for older individuals to aid or assist on a voluntary basis in the delivery of such services to children, adults, and families. (OAA 306(a)(6)(C))
- 31. The AAA/ADRC shall assure that demonstrable efforts shall be made to coordinate services provided under the OAA with other State services that benefit older individuals and to provide multi-generational activities involving older individuals as mentors to youth and support to families. (OAA 306(a)(23))
- 32. The AAA/ADRC shall coordinate any mental health services provided with III B funds with the mental health services provided by community health centers and by other public agencies and nonprofit private organizations. (OAA 306(a)(6)(F))

- 33. The AAA/ADRC shall maintain the integrity and public purpose of services provided, and service contractors, under the OAA, in all contractual and commercial relationships. (OAA306(a)(13)(A))
- 34. The AAA/ADRC shall demonstrate that a loss or diminution in the quality or quantity of the services provided under the Area Plan has not resulted and shall not result from such contracts or commercial relationships, but rather, shall be enhanced. (OAA 306(a)(13)(C) and (D))
- 35. The AAA/ADRC shall not give preference in receiving services under the OAA to particular older individuals as a result of a contract or commercial relationship. (OAA 306(a)(15))
- 36. The AAA/ADRC shall require nutrition service providers/contractors to reasonably accommodate the particular dietary needs arising from health requirements, religious requirements, or ethnic backgrounds of eligible individuals and require caterers to provide flexibility in designing meals that are appealing to older individuals participating in the program. (OAA 339 (A) and (B))
- 37. The AAA/ADRC shall enter into contract only with providers/contractors of legal assistance who can:
  - a. demonstrate the experience or capacity to deliver legal assistance;
  - assure that any recipient of funding for legal assistance shall be subject to specific restrictions and regulations promulgated under the Legal Services Corporation Act;
  - c. require providers/contractors of legal assistance to give priority to cases related to income, health care, long-term care, nutrition, housing, utilities, protective services, defense of guardianship, abuse, neglect and age discrimination; and
  - d. attempt to involve the private bar in legal assistance activities. (OAA 307(a)(11)(A) through (E))
- 38. The AAA/ADRC shall make special efforts to provide technical assistance to minority providers/contractors of services whether or not they are providers/contractors of the AAA/ADRC. (OAA 307(a)(32))
- 39. The AAA/ADRC is responsible for on-going contract management; establishing procedures for contract cost containment; reviewing and approving contracts; setting criteria for contract amendments; reviewing and analyzing provider/contractor fiscal and program reports; conducting quality assurance reviews; and reviewing meal vendor performance.
- 40. The AAA/ADRC shall collaborate with providers/contractors to develop an emergency service delivery plan for group dining and home-delivered meals, transportation, and home care. This emergency service delivery plan must be included in the Area Plan submitted to the LGOA by the AAA/ADRC, as well as included in each contract signed between the AAA/ADRC and an aging service provider/contractor. The emergency plan shall also cover general agency operations

during periods of crisis, hazardous weather, emergencies, and unscheduled closings.

- 41. Providers/Contractors shall submit holiday schedules to their AAA/ADRC for approval and the providers/contractors shall adhere to their approved holiday schedule. The AAAs/ADRCs shall include their providers'/contractors' holiday schedules in their Area Plan. These scheduled closings shall be part of the contract established between the AAA/ADRC and providers/contractors. Any changes to the scheduled holiday closings must be noted in the Area Plan update.
- 42. The AAA/ADRC shall afford an opportunity for a public hearing upon request, in accordance with published procedures, to any agency submitting a plan to provide services; issue guidelines applicable to grievance procedures for older individuals who are dissatisfied with or denied services funded under the Area Plan; and afford an opportunity for a public hearing, upon request, by a provider/contractor of (or applicant to provide) services, or by any recipient of services regarding any waiver requested. (OAA 307(a)(5) (A) through (C))

## G. COORDINATION, OUTREACH, AND INFORMATION AND REFERRAL ASSURANCES

- 1. Coordination and outreach efforts should be detailed in the Area Plan, with particular emphasis on coordination with entities conducting Federal programs as outlined in Section 403 B-10 of the South Carolina Aging Network's Policies and Procedures Manual.
- 2. The AAA/ADRC shall have a visible focal point of contact where anyone can visit or call for assistance, information, or referrals on any aging and/or adults with disability issue.
- 3. The AAA/ADRC shall require providers/contractors to use outreach efforts that shall identify individuals eligible for assistance under the OAA, with special emphasis on
  - a. Older individuals residing in rural areas
  - b. Older individuals with greatest economic need
  - c. Older individuals with greatest social need
  - d. Older individuals with severe disabilities
  - e. Older individuals with limited English speaking ability
  - f. Older individuals with Alzheimer's disease or related disorders and caregivers
  - g. Low income minority individuals in each of the above populations. (OAA 306(a)(4)(B))
- 4. The AAA/ADRC and those with whom they contract must take adequate steps to ensure that persons with limited English language skills receive, free of charge, the language assistance necessary to afford them meaningful and equal access to the benefits and services provided under this grant award.
- 5. The AAA/ADRC shall provide for the identification of public and private resources in or serving persons in, the planning and service area as part of their overall outreach and coordination efforts. Local aging partners should be brought into the AAA's/ADRC's planning process in order to better serve the region's older population. The

AAA/ADRC shall work to coordinate the programs funded under the Area Plan with such resources to increase older persons' access to quality services. Coordination and outreach efforts should be detailed in the Area Plan, with particular emphasis on coordination with entities conducting Federal programs as outlined in Section 403 B-10 of the South Carolina Aging Network's Policies and Procedures Manual. Where appropriate, the AAA/ADRC shall consider joint funding and programming to better serve older persons.

6. The AAA/ADRC shall employ a fulltime (or fulltime equivalent) Information and Referral/Assistance (I&R/A) Specialist as a requirement of receiving Title III-B and Title III-E funding.

#### H. ASSURANCES REQUIRED BY THE ADMINISTARTION ON AGING (AoA)

(Taken directly from the Program Instructions for the 2013 State Plan)

These assurances are required by the Administration on Aging (AoA) and the Lieutenant Governor's Office on Aging (LGOA) for the Planning Service Area (PSA) and AAA/ADRC (AAA)/Aging and Disability Resource Center (ADRC) as part of the 2013 State Plan submission. (The assurances below are from the 2013 State Plan Instructions provided by the AoA.) By signing this document, the PSA and AAA/ADRC have assured they shall adhere to these Older Americans Act requirements.

#### Section 306(a) of the Older Americans Act (OAA), AREA PLANS

- (2) Each AAA/ADRC shall provide assurances that an adequate proportion, as required under section 307(a)(2), of the amount allotted for part B to the planning and service area shall be expended for the delivery of each of the following categories of services
- (A) services associated with access to services (transportation, health services (including mental health services), outreach, information and assistance (which may include information and assistance to consumers on availability of services under part B and how to receive benefits under and participate in publicly supported programs for which the consumer may be eligible), and case management services);
- (B) in home services, including supportive services for families of older individuals who are victims of Alzheimer's disease and related disorders with neurological and organic brain dysfunction; and
- (C) legal assistance; and assurances that the AAA/ADRC shall report annually to the State agency in detail the amount of funds expended for each such category during the fiscal year most recently concluded.
- (4)(A)(i)(I) provide assurances that the AAA/ADRC shall—
- (aa) set specific objectives, consistent with State policy, for providing services to older individuals with greatest economic need, older individuals with greatest social need, and older individuals at risk for institutional placement;
- (bb) include specific objectives for providing services to low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas; and
- (II) include proposed methods to achieve the objectives described in items (aa) and (bb) of sub clause (I);
- (ii) provide assurances that the AAA/ADRC shall include in each agreement made with a provider/contractor of any service under this title, a requirement that such provider/contractor shall—

- (I) specify how the provider/contractor intends to satisfy the service needs of low-income minority individuals, older individuals with limited English proficiency, and older individuals residing in rural areas in the area served by the provider/contractor;
- (II) to the maximum extent feasible, provide services to low-income minority individuals, older individuals with limited English proficiency, and older individuals residing in rural areas in accordance with their need for such services; and
- (III) meet specific objectives established by the AAA/ADRC, for providing services to low-income minority individuals, older individuals with limited English proficiency, and older individuals residing in rural areas within the planning and service area; and
- (4)(A)(iii) With respect to the fiscal year preceding the fiscal year for which such plan is prepared, each AAA/ADRC shall
- (I) identify the number of low-income minority older individuals and older individuals residing in rural areas in the planning and service area;
- (II) describe the methods used to satisfy the service needs of such minority older individuals; and
- (III) provide information on the extent to which the AAA/ADRC met the objectives described in clause (a)(4)(A)(i).
- (4)(B)(i) Each AAA/ADRC shall provide assurances that the AAA/ADRC shall use outreach efforts that shall identify individuals eligible for assistance under this Act, with special emphasis on
- (I) older individuals residing in rural areas;
- (II) older individuals with greatest economic need (with particular attention to low-income minority individuals and older individuals residing in rural areas);
- (III) older individuals with greatest social need (with particular attention to low-income minority individuals and older individuals residing in rural areas);
- (IV) older individuals with severe disabilities;
- (V) older individuals with limited English proficiency;
- (VI) older individuals with Alzheimer's disease and related disorders with neurological and organic brain dysfunction (and the caretakers of such individuals); and
- (VII) older individuals at risk for institutional placement; and
- (4)(C) Each AAA/ADRC shall provide assurance that the AAA/ADRC shall ensure that each activity undertaken by the agency, including planning, advocacy, and systems development, shall include a focus on the needs of low income minority older individuals and older individuals residing in rural areas.
- (5) Each AAA/ADRC shall provide assurances that the AAA/ADRC shall coordinate planning, identification, assessment of needs, and provision of services for older individuals with disabilities, with particular attention to individuals with severe disabilities, and individuals at risk for institutional placement, with agencies that develop or provide services for individuals with disabilities.

#### (6)(F) Each AAA/ADRC shall:

- in coordination with the State agency and with the State agency responsible for mental health services, increase public awareness of mental health disorders, remove barriers to diagnosis and treatment, and coordinate mental health services (including mental health screenings) provided with funds expended by the AAA/ADRC with mental health services provided by community health centers and by other public agencies and nonprofit private organizations;
- (9) Each AAA/ADRC shall provide assurances that the AAA/ADRC, in carrying out the State Long Term Care Ombudsman program under section 307(a)(9), shall expend not less than the

total amount of funds appropriated under this Act and expended by the agency in fiscal year 2000 in carrying out such a program under this title.

- (11) Each AAA/ADRC shall provide information and assurances concerning services to older individuals who are Native Americans (referred to in this paragraph as "older Native Americans"), including:
  - (A) information concerning whether there is a significant population of older Native Americans in the planning and service area and if so, an assurance that the AAA/ADRC shall pursue activities, including outreach, to increase access of those older Native Americans to programs and benefits provided under this title;
  - (B) an assurance that the AAA/ADRC shall, to the maximum extent practicable, coordinate the services the agency provides under this title with services provided under title VI; and
  - (C) an assurance that the AAA/ADRC shall make services under the Area Plan available; to the same extent as such services are available to older individuals within the planning and service area, to older Native Americans.
- (13)(A) Each AAA/ADRC shall provide assurances that the AAA/ADRC shall maintain the integrity and public purpose of services provided, and service providers/contractors, under this title in all contractual and commercial relationships.
- (13)(B) Each AAA/ADRC shall provide assurances that the AAA/ADRC shall disclose to the Assistant Secretary and the State agency
- (i) the identity of each nongovernmental entity with which such agency has a contract or commercial relationship relating to providing any service to older individuals; and
- (ii) the nature of such contract or such relationship.
- (13)(C) Each AAA/ADRC shall provide assurances that the AAA/ADRC shall demonstrate that a loss or diminution in the quantity or quality of the services provided, or to be provided, under this title by such agency has not resulted and shall not result from such non-governmental contracts or such commercial relationships.
- (13)(D) Each AAA/ADRC shall provide assurances that the AAA/ADRC shall demonstrate that the quantity or quality of the services to be provided under this title by such agency shall be enhanced as a result of such non-governmental contracts or commercial relationships.
- (13)(E) Each AAA/ADRC shall provide assurances that the AAA/ADRC will, on the request of the Assistant Secretary or the State, for the purpose of monitoring compliance with this Act (including conducting an audit), disclose all sources and expenditures of funds such agency receives or expends to provide services to older individuals.
- (14) Each AAA/ADRC shall provide assurances that funds received under this title shall not be used to pay any part of a cost (including an administrative cost) incurred by the AAA/ADRC to carry out a contract or commercial relationship that is not carried out to implement this title.
- (15) provide assurances that funds received under this title shall be used-
- (A) to provide benefits and services to older individuals, giving priority to older individuals identified in paragraph (4)(A)(i); and
- (B) in compliance with the assurances specified in paragraph (13) and the limitations specified in section 212.

The AAA/ADRC certifies compliance with all of these assurances and requirements of the OAA, as amended, the Federal regulations pertaining to such Act, and the policies of the LGOA

## 2014 – 2017 LGOA Comprehensive PSA and AAA/ADRC Area Plan Instructions Guide and Assurances

throughout the effective period of this Area Plan. Should any barriers to compliance exist, the AAA/ADRC shall develop procedures to remove such barriers. Some assurances may be modified by Federal regulations issued or the OAA reauthorization during the plan period. In such event, a revised list of assurances shall be issued.

By signing this Assurances document, the Planning and Service Area (PSA) and Area Agency on Aging (AAA) and Aging and Disability Resource Center (ADRC) accept the assurances mandated by the Older Americans Act (OAA), Administration on Aging (AoA) and Lieutenant Governor's Office on Aging (LGOA), and will ensure that components of these assurances are included in the 2014 – 2017 Area Plan.

Date	Signature of Executive Director
	Planning Service Area (PSA)
Date	Signature of Aging Unit Director
The Area Agency Advisory Co	uncil has reviewed and approved these Assurances.
Date	Signature of Chair, Area Agency
	Advisory Council
The Governing Board of Plan	ning Service Area (PSA) has received and approved these
Assurances.	
Date	Signature of Chair, PSA Governing Board



# **APPENDIX D**

# REQUIRED DOCUMENTS IN THE 2014 – 2017 AREA PLAN



#### Required Documents to be included in the Area Plan

- AAA/ADRC Comprehensive Operating Budget
- Narrative Justification of AAA/ADRC Operating Budget
- PSA/AAA/ADRC Summary Program Budget-Computation of Grants
- AAA/ADRC Comprehensive Operating Budget State Fiscal Year 2014 2017
- Worksheet for Staffing Budget and NAPIS Staffing Profile for 2013 2014
- Four Year history of Contracted Units and Unit Costs of Services State Fiscal Years Beginning July 1, 2012 –June 30, 2015
- Summary of Service Funding, Contracted Units and Average Cost SFY 2014 2017
- 2014 2017 Expenditures and Budget for Priority Services
- Minimum Expenditures for Priority Service Categories Requested Transfer of Federal Funds
- Regional Summary of Service Budgets, Units and Unit Costs
- Summary Program Budget and Computation of Costs Four Year History of Contracted Units and Cost Comparisons
- Geographic Distribution of Revenue for Purchased Services
- AAA/ADRC Staffing Worksheet
- Analysis of Targeted Population
- Minority Population
- Designated and Undesignated Focal Point Chart
- GIS Maps Highlighting Targeted Populations Being Served
- A Map of the Region
- County Maps for Region



# **APPENDIX E**

# AAA/ADRC Checklist for Area Plan Content



# AAA/ADRC CHECK OFF LIST FOR AREA PLAN DOCUMENT AND CONTENT

I.	Introduction		
	□ Purpose		
	□ Signed Verification of Intent		
	☐ Signed Verification of AoA and LGOA Assurances and General Conditions		
II.	Executive Summary		
	□ Executive Summary		
III.	Overview of the AAA/ADRC		
	□ Mission Statement		
	□ Vision for the four (4) years covered by this plan		
	□ Organizational Structure		
	□ Staff Experience and Qualifications		
	□ Regional Aging Advisory Council Board		
	□ Current Funding Resources for AAA/ADRC Operations		
	□ Written Procedures		
	□ Sign-in Sheets		
	□ Service Units Earned		
	□ Reimbursement for Services		
	□ Client Data Collection		
	□ Client Assessments		
	□ General Fiscal Issues		
	☐ General Provisions for AAA/ADRC		
	☐ High-Risk Providers/Contractors and Corrective Action Plans (CAP)		
<b>TX</b> 7			
IV.	Overview of the Planning and Service Area Region		
	□ Service Delivery Areas □ Objectives and Methods for Services to OAA Torgeted Populations		
	Objectives and Methods for Services to OAA Targeted Populations  Tan Year Foregoet for the Planning and Service Area Region		
	☐ Ten-Year Forecast for the Planning and Service Area Region		
	□ Emergency Preparedness		
	□ Holiday Closings		
V.	AAA/ADRC Operational Functions and Needs		
	□ Program Development		

	□ Program Coordination
	□ AAA/ADRC and Long Term Care
	□ Advocacy
	□ Priority Services
	□ Priority Service Contractors
	□ Transportation
	□ Nutrition Services
	□ Training and Technical Assistance
	□ Monitoring
	□ Contract Management
	□ Grievance Procedures
	□ Performance Outcome Measures
	□ Resource Development
	□ Cost-sharing and Voluntary Contributions
	□ Confidentiality and Privacy
VI.	AAA/ADRC Direct Service Delivery Functions
	□ Staff Experience and Qualifications
	□ Long Term Care Ombudsman Services
	☐ Information and Referral/Assistance Services
	☐ Insurance Counseling and Senior Medicare Patrol
	□ Family Caregiver Support Program
	□ Disease Prevention/Health Promotion
VII.	Changing Demographic Impact on AAA's/ADRC's Efforts
	□ Intervention vs. Prevention
	□ Senior Center Development and Increased usage
	□ Alzheimer's disease
	□ Legal Assistance
VIII.	Region Specific Initiatives
	□ Region Specific Initiatives
IX.	Appendices
	Required Documents
	□ AAA Comprehensive Operating Budget
	□ Narrative Justification of AAA/ADRC Operating Budget
	□ PSA/AAA/ADRC Summary Program Budget-Computation of Grants
	□ AAA/ADRC Comprehensive Operating Budget State Fiscal Year 2014
	<ul> <li>− 2017</li> <li>□ Worksheet for Staffing Budget and NAPIS Staffing Profile for 2013 –</li> </ul>
	2014
	□ Four Year history of Contracted Units and Unit Costs of Services –
	State Fiscal Years Beginning July 1, 2012 –June 30, 2015
	□ Summary of Service Funding, Contracted Units and Average Cost SFY
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2014 – 2017
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