

<b>Region 9 AAA</b>	<b>Local Policy #</b>	<b>17</b>
<b>Policy Name</b>	<b>Privacy Compliance</b>	
<b>Original Policy Date</b>	<b>March 2011</b>	
<b>Review/Revise Date</b>	<b>April 7, 2011, March 10, 2014, November 2016</b>	

**Policy:**

It is the intent of the Area Agency on Aging to ensure all client information is held in the utmost secure environment. Protections must be taken to ensure all formats of protected information are addressed within the organization. This includes written data, physical storage, electronic data, verbal information, disposal, etc.

In accordance with increasing federal and state legislation, subcontractors must develop and implement comprehensive privacy policies and procedures for the organization's employees and volunteers. For those subcontractors that receive protected health information, the policies and procedures are to minimally meet the requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health of 2009 (HITECH).

**Procedures:**

1. Required elements for entities receiving protected health information include the following components: (this is not an all inclusive list)
  - A. Policy and Procedures (including Breach Notification)
  - B. Authorization to Release Information form
  - C. Business Associate Agreement
  - D. Relevant and routine staff training
2. The Area Agency on Aging will provide the subcontractor with sample documents and training to the extent possible; however, the ultimate responsibility rests with the Subcontractor.
3. Subcontractors are to stay abreast of new developments regarding ongoing and new legislative changes in regards to privacy and confidentiality laws.

<b>Region 9 AAA</b>	<b>Local Policy #</b>	<b>18</b>
<b>Policy</b>	<b>Name: Criminal History Minimum Standard</b>	
<b>Original Policy Date:</b>	<b>March 2013</b>	
<b>Review/Revise Date:</b>	<b>March 10, 2014, November 2016</b>	

**Policy:**

Each Subcontractor must conduct a criminal history check for all paid and/or volunteer staff persons working in Area Agency on Aging funded programs prior to placement and minimally every five years per OSA (now AASA) Policy (TL #2012-253). An individual with a record of a felony conviction may be considered for employment or volunteer position at the discretion of the Subcontractor after taking into consideration the conviction, length of time since the incident, job duties and risk analysis.

**Purpose:**

To ensure criminal history checks are periodically updated for staff and volunteers working with vulnerable program participants and to ensure participants and programs are not put at unnecessary risk due to past criminal activity.

**Procedure:**

1. All Subcontractors are required to maintain documentation of criminal history checks, including a list of all paid and volunteer staff, the date of the most recently completed background check, and the source of the background check. Employees hired prior to the year 2000 are not exempt from this requirement. A template for the format of this document, including required data fields, is attached to this policy.
2. All Subcontractors are required to update criminal history checks at least every five years to identify convictions in the event that they occur while an individual is employed or providing volunteer service.
3. All Subcontractors are required to maintain a copy of the results of each criminal history check for paid and volunteer staff working in Area Agency on Aging funded programs in a confidential and controlled access file.
4. All Subcontractors shall develop guidelines to review felony convictions that are identified during required criminal history checks. The guidelines describe the manner by which the Subcontractor will determine the appropriateness of employment or

volunteer activities when a felony is identified. These guidelines must address, but are not limited to:

- The nature of the felony offense for which the individual was convicted;
  - The time that has elapsed since the conviction; and
  - The nature of the employee or volunteer's work on behalf of the Subcontractor.
5. Senior Community Service Employment Program (SCSEP) enrollees are not covered under this policy. SCSEP enrollees are participants in a federal employment and training program and are subject to rules under applicable U.S. Department of Labor policy.
  6. Area Agency on Aging staff will verify completeness of criminal history check staff and volunteer lists during the annual on-site assessment visits. Additionally, Area Agency on Aging staff will test a random sample of employee and volunteer files to verify criminal history check documentation.
  7. Information regarding the Michigan State Police Criminal Justice Information Center's Internet Criminal History Access Tool (ICHAT) is available upon request.



<b>Region 9 AAA</b>	<b>Local Policy #</b>	<b>19</b>
<b>Policy Name</b>	<b>Budget Approval</b>	
<b>Original Policy Date</b>	<b>March 10, 2014</b>	
<b>Review/Revise Date</b>	<b>November 2016</b>	

**Policy:**

The Area Agency on Aging is responsible for fiscal monitoring of Subcontractors. Accurate fiscal reporting on the part of the Subcontractor coincides with the budget development process. Subcontractor budgets should be well planned to provide a reliable guide for spending. Subcontractor budgets require written approval from the AAA.

**Procedures:**

1. Subcontractor will submit a budget to AAA by requested due date.
2. The AAA staff will review submitted budget for mathematical accuracy and appropriateness. If changes are required, an AAA staff member will contact the Subcontractor and discuss.
3. The AAA will notify the subcontractor in writing of the approval of the submitted budget.

<b>Region 9 AAA</b>	<b>Local Policy #</b>	<b>20</b>
<b>Policy Name</b>	<b>Cash Request</b>	
<b>Original Policy Date</b>	<b>March 10, 2014</b>	
<b>Review/Revise Date</b>	<b>November 2016</b>	

**Policy:**

The Area Agency on Aging requires specific reporting documentation to ensure there is not excess cash on hand.

**Procedures:**

1. Complete and submit the cash request form.
  1. Complete service financial report(s).
  2. Estimate following month's expenses. Be sure to anticipate current needs only, do not overestimate. If figures are inflated, this will affect subsequent cash requests.
  3. Complete the Maximum Monthly Request column. This figure will be:
    - # of months into FY (numerator)/6 (denominator) if during 6 month SGA time period multiplied by the SGA award. **OR**
    - # of months into FY (numerator)/12 (denominator) if during 12 month SGA time period multiplied by the SGA award.
  4. Exception to the above Maximum Monthly Request: For IIID Funding or Elder Abuse Funding, please note as many times these are specific programs/conferences, if the program/conference is scheduled in advance and written notice is given, the Monthly Request amount may be for the full project amount if approved.
  5. For those Counties who receive Kinship Funding only the amount of the support groups will be requested on the cash request. The cash request for reimbursing the grandparent will continue to be processed through our Accounts Payable department as requests are approved.
  
2. Deadline to submit cash request form is the 5<sup>th</sup> working day of the month. Failure to meet this deadline may delay payment up to one month.

<b>Region 9 AAA</b>	<b>Local Policy #</b>	<b>21</b>
<b>Policy</b>	<b>Liquid Supplements as Meals</b>	
Original Policy Date:	<b>February 2016</b>	
Review/Revise Date:	<b>November 2016</b>	

**Policy:**

The Older Americans Act Title III funds can be used to purchase liquid supplements; however, per the Administration on Aging (ACL), nutrition providers receiving Nutrition Services Incentive Program (NSIP) funding cannot count a liquid supplement(s) by itself as a reimbursable meal in the NAPIS reporting system. If the supplement is served in addition to a meal that meets the one-third Dietary Reference Intakes (DRI) as required by the Older Americans Act, the meal plus the supplement will count as a meal.

**Purpose:**

To clarify ACL requirements and provide procedural guidance in order to count liquid supplements as NAPIS-reportable meals for NSIP reimbursement.

**Procedure:**

8. Liquid supplements can be purchased with Older Americans Act (OAA) Title III Part C funds. They cannot be counted as a meal in NAPIS or for Nutrition Services Incentive Program (NSIP) purposes unless the liquid meal is served as part of a full meal that meets the one-third Dietary References Intakes (DRI) as required by the Older Americans Act.
9. All AAA-funded nutrition providers must meet the one-third DRI when offering a complete meal to clients. A meal is defined as:
  - a. A full meal that meets DRI; or
  - b. A full meal that meets DRI and two (2) cans of liquid supplement; or
  - c. A full meal that meets DRI and one (1) can of supplement if second can is refused;
  - d. If this criteria is not met, the supplements are then reported as non-eligible meals on the financial report (2 cans of supplement = 1 non-eligible meal).
10. NSIP funds can only be used to purchase domestically produced foods; not liquid supplements.
11. A physician's prescription for liquid supplements is still required to be in the client's file.

Reference: [http://www.aoa.acl.gov/AoA\\_Programs/hpw/Nutrition\\_Services/DOCS/OAA-Nutrition-Program-FAQ.pdf](http://www.aoa.acl.gov/AoA_Programs/hpw/Nutrition_Services/DOCS/OAA-Nutrition-Program-FAQ.pdf)