

Area Agency on Aging
Contractor Monitoring
Desk Manual



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INTRODUCTION

Mandate to Monitor Programs and Purpose of Monitoring

Area Agencies on Aging (AAA) are governed by the mandates of the Older Americans Act. This law intends for AAAs to be the leader relative to all aging issues on behalf of all older persons in the Planning and Service Area [45CFR1321.53]. In California, the implementation of the Older Americans Act is outlined in Title 22, Division 1.8. The Marin County Area Agency on Aging was designated as a one-county Planning and Service Area by the Board of Supervisors in the late 1970s. The oversight of Marin's AAA is currently under the auspices of the Department of Health and Human Services, Division of Social Services, Office of Aging and Adult Services.

The California Department of Aging (CDA) contracts with the County of Marin to implement Older Americans Act programs and services at the local level. The County also makes a significant investment in providing these services to the community through matching County general funds. To that end, the Marin County AAA carries out, in partnership with CDA, a wide range of functions related to advocacy, planning, coordination, inter-agency linkages, information sharing, brokering, monitoring, and evaluation of programs and services to create a comprehensive and well-coordinated system of care and supports for the client population in the community. The AAA contracts the delivery of most of these Older Americans Act services to home- and community-based agencies in Marin, with close to 90% of the federal, state, and county funds going to community agencies to serve the client population. As such, the Marin County AAA is required to monitor its community-based contractors on an ongoing basis to ensure compliance with the laws, regulations, and provisions of the Older Americans Act programs. The AAA establishes reporting requirements, conducts regular site visits, maintains contact with the provider, tracks performance goals, reviews and assesses compliance with contract assurances, and provides technical assistance to ensure successful execution of the program and safeguard appropriate and effective management of funds [2CFR200.331].

The Marin County Area Agency on Aging conducts two types of monitoring: Scope Monitoring and Program Monitoring. The purpose of this *Monitoring Desk Manual* is to guide agencies on how to implement, operate, and administer programs and services contracted by the Marin County AAA. The manual documents the policies, procedures, and protocols that must be followed by contractors and will be monitored by the AAA to ensure compliance with the regulatory requirements of the Older Americans Act as well as established program policies and standards. References to the regulations governing the requirements outlined in this *Monitoring Desk Manual* are cited throughout this document.

MONITORING PROCESS

Scope Monitoring

The purpose of the Scope Monitoring is to assess the contactor’s performance in achieving service unit targets and to review compliance with data reporting and invoice submission requirements. The Scope Monitoring of its contracts is performed by the AAA on a **quarterly** basis. The AAA’s Scope Monitoring process and protocols are as follows:

1. Enter service units provided in GetCare/CARS in compliance with the California Department of Aging, National Aging Program Information System (NAPIS), and AAA reporting requirements.
 - Contractor MIS Manager/Coordinator enters units served in the GetCare/CARS database system by the 10th of the month for the previous month.
 - AAA Support Service Worker enters units served in the GetCare/CARS database system by the 10th of the month for the previous month for programs provided directly by the AAA.

2. Monitor performance on achieving Service Unit Plan targets
 - The AAA’s Planner is the MIS Manager for the AAA and validates all NAPIS data submitted in GetCare/CARS and offers technical assistance on data issues.
 - AAA Senior Program Coordinators review data entered each month. Every quarter they discuss performance trends, areas that need attention and any support that may be needed to ensure successful implementation of funded programs.
 - Service Unit Plan targets and monitoring schedule are as follows:

Quarter	Scope of Service Units Targets	Monitoring Schedule
1 st Quarter	25%	October
2 nd Quarter	50%	January
3 rd Quarter	75%	April
4 th Quarter	100%	July

- AAA Senior Program Coordinators contact contractors each quarter and discuss unit performance. After Quarter 1, contractors that perform at or below 10% of expected Scope of Service unit performance levels for the quarter being reviewed must submit an Action Plan that describes steps the contractor will take to achieve performance goals.
- AAA Senior Program Coordinators review and approve contractor action plans and closely monitor contractor’s performance. Technical assistance is provided by the AAA as needed.

3. Monitor contractor invoice submission.
 - Contractor invoices are due on the 10th of the month for services rendered the previous month. AAA protocols and procedures for approving invoices are followed.
 - AAA Administrative Assistant maintains an invoice tracking sheet.
 - AAA staff and management review the invoice tracking sheet each month following the invoice due date to assess contractors' timely submission of invoices.
 - Following the program Scope Monitoring schedule and performance targets outlined above, AAA staff and management assess contractors' expenditure targets on a quarterly basis. Claims above or below 10% of expected accounts payable for the quarter (25% of contracted funds for the first quarter, 50% for the second quarter, 75% for the third quarter, and 100% by the end of the fiscal year) will require an explanation by the contractor. The AAA Senior Program Coordinator assigned to the program will work with the contractor to ensure effective use and management of funds.

Program Monitoring

As the administrator of Older Americans Act (OAA) programs in Marin County, the AAA is required to monitor its contracted service providers that deliver OAA services in the community. In addition to the quarterly Scope Monitoring, the AAA conducts an annual Program Monitoring of its contractors. The Program Monitoring is designed to review the ways in which the contractor implements the Older Americans Act-funded program, assess the contractor's compliance with the regulatory requirements of the program, and provide the necessary oversight and technical assistance to the contractor to ensure compliance with the regulatory requirements and standards set forth for the program. The following delineates the AAA's monitoring procedures and the roles and responsibilities of the contractor in this process.

Preparing for the Program Monitoring

The AAA shall perform the following procedures in preparation for the onsite Program Monitoring of its contractors:

1. By December 31 of each fiscal year, The AAA Senior Program Coordinators shall do the following:
 - Review the contract file, scope of service, data and invoice submissions, and program monitoring report from the prior year, if applicable.
 - Review all monitoring tools and make any necessary changes.
 - Develop a monitoring schedule.
 - Contact members of the advisory council to solicit interest in participating in the monitoring visit.
2. At least 45 days prior to the scheduled onsite visit, AAA Program Coordinators shall provide contractors with the following:
 - The Monitoring tool. (Appendix B)

- Program Monitoring appointment confirmation.
- Desk review document request. (Appendix A)
- The name of individuals who will conduct the program monitoring.

Document Desk Review

Providers are required to submit documents prior to the monitoring visit, as requested in Appendix A of the communication sent by AAA Senior Program Coordinators prior to the monitoring visit (see above section on “Preparing for the Monitoring Visit”). The purpose of this request is to provide an opportunity for the AAA staff to review the documents and ensure that the provider’s documents contain all the elements required for program compliance and adherence to all applicable state, federal, and local regulations, policies, and protocols. Corrections that need to be made on any of the documents reviewed will be discussed with the provider during the monitoring visit. Technical assistance will be provided. Any necessary and corrective action will be noted on the AAA monitoring report that includes a deadline for compliance.

The following documents are listed in Appendix A and are required to be submitted 30 days prior to the scheduled monitoring visit.

1. The AAA Senior Program Coordinators will review all submitted documents for the following basic elements prior to the program monitoring visit:
 - Organizational chart: all staff and volunteers involved in the funded program must appear on the organizational chart. The chart should clearly identify the reporting levels within the organization for these positions.
 - Job descriptions: all staff and volunteers involved in the funded program must have a job description. The job descriptions must be clear and reflective of the program requirements.
 - Training logs and manuals for staff and volunteers.
 - Disaster preparedness plan.
 - Outreach materials.
 - Client waiting list.
 - Grievance Policy [CCR 7400(2)(A)]: clearly delineates the following requirements:
 - a. Key elements of the policy i.e.: levels, specific time frames.
 - b. How clients will be notified of the process.
 - c. How unsatisfied clients are referred to the AAA.
 - d. Posting of the policy in an accessible location.
 - e. Confidentiality of the contractor’s grievance process.
 - f. Number of complaints received, resolved or sent to the AAA.
 - g. Any changes since the last review.
 - Contractor Donation request letter or picture of donation signage [OAA Section 315(b)(1)-(4)]
 - a. Make sure the letter or picture refers to the AAA funded program.
 - b. Verify that letter or picture clearly states that there is no obligation to contribute.

- c. Verify that letter or picture clearly states that service will not be denied if participant chooses not to contribute.
 - d. Verify that letter or picture state that donations are confidential.
 - Client intake form (applicable for registered service only): contains all the data reporting elements required by the California Department of Aging.
 - Tool used to monitor subcontractors. Tool must:
 - a. Policy and procedures regarding the use of subcontractors.
 - b. Identify which services are subcontracted out.
 - c. Identify who the subcontractors are.
 - d. Review policies and procedures regarding monitoring of subcontractors.
 - e. Review the monitoring tool used.
2. At least two weeks prior to the scheduled visit, the AAA Senior Program Coordinators shall perform the following:
 - Provide the assigned advisory council member(s) a copy of the contractor's completed monitoring tool and any background information about the provider.
 - Review contractor's completed monitoring tool.
 - Request additional information and documents as necessary.
 - Print and review GetCare/CARS service data report to-date.
3. In preparation for the Program Monitoring onsite visit by the AAA, contractors will perform the following:
 - Review the Program Monitoring Notification sent by the AAA.
 - Complete the AAA Program Monitoring tool.
 - Prepare documents and reports requested by the AAA.
 - Review Scope of Service and contract with the AAA.
 - Submit the completed monitoring tool and back-up documents and reports requested by the AAA to the assigned AAA **Senior** Program Coordinator at least **two weeks** prior to the monitoring appointment.

The Program Monitoring Visit

The AAA Senior Program Coordinators are responsible for managing contracts, which includes conducting a monitoring visit with providers annually. During the onsite monitoring visit, AAA Senior Program Coordinators, along with an AAA advisory council member(s), if available, will conduct Program Monitoring as follows:

1. Review each question in the monitoring tool completed by the contractor.
2. Verify the contractor's response/comment to each question.
3. Talk about any deficiencies in the desk review documents and how to get back into compliance.
4. Ask the Contractor to talk about successes and challenges in the program.
5. Note the major program activities.
6. Go over the scope and program-specific requirements with the contractor, including the following. Perform visual inspection as necessary.
 - Voluntary Donation Request [OAA Section 315(b)(1)-(4)]

- Grievance Policy [CCR 7400(2)(A)]
 - a. Notification of clients regarding contractor grievance policy and AAA grievance policy [CCR 7400(2)(C)(3)]
 - b. Posting of Contractors grievance policy [CCR 7400(2)(A)&(B)]
 - c. Notification of homebound participants [CCR 7400(2)(A)&(B)]
- 7. Provide technical assistance as necessary.
- 8. Allow the advisory council member to make remarks and ask questions.
- 9. Note any possible findings and make recommendations to the contractor.
- 10. Discuss the timeline for any corrections.
- 11. Check to see if Marin County Living Wage information is posted in a visible area.
- 12. Check to see if the contractor's grievance policy is posted in a visible area.

Program Monitoring Follow-up

After conducting the Program Monitoring visit, AAA Senior Program Coordinators shall:

1. Prepare the Program Monitoring Report that includes the following:
 - Cover Letter
 - Monitoring report with AAA Senior Program Coordinator's comments.
 - AAA Senior Program Coordinator's findings, if any, and timeline for completing corrective actions
 - Acknowledgement letter for signature of the contractor's representative
2. Send the AAA Program Monitoring Report to the contractor
 - For a contractor that does not have any finding, the following process shall be followed by the AAA Senior Program Coordinator:
 - a. Prepare and send the AAA Monitoring Report to the contractor **within 30 calendar days** of the visit.
 - b. Ensure that contractor signs and returns the AAA Program Monitoring Report cover letter.
 - c. File the signed AAA Program Monitoring cover letter in the contractor's paper file.
 - d. This concludes the Program Monitoring for this contractor.
 - For a contractor that has findings and corrective actions are needed for the contractor to be in compliance with the requirements of the program the AAA Program Coordinator will establish a deadline for the contractor to remedy the findings and perform the corrective action.
3. File electronic documents and any hard copies in the contractor's file.

Upon receipt of the AAA Program Monitoring Report, the contractor shall perform the following actions:

1. If the contractor does not have any finding on the AAA Program Monitoring, sign and return the AAA Program Monitoring Report cover letter to the assigned AAA Senior Program Coordinator. This concludes the contractor's monitoring for the fiscal year.

2. If the contractor is not in compliance with the requirements of the program and corrections are needed, the contractor shall perform the following:
 - Submit a Plan of Correction to the AAA Senior Program Coordinator by the timeline specified in the AAA Monitoring Report.
 - Sign the AAA Program Monitoring Report cover letter and include it in the Plan of Correction.
 - Complete corrective actions and submit necessary backup documentation to the AAA Senior Program Coordinator no later than **May 31st**.
 - Upon completion of any correction, contractor is released from sanctions and the monitoring process is complete.

Summary of AAA Fiscal Year Monitoring Timeline

Below is a summary of the Marin County AAA’s Scope and Program Monitoring timeline:

Activity	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Contract starts													
Quarterly Scope Monitoring													
AAA Coordinators prepare for Program Monitoring													
Schedule onsite monitoring visits													
AAA Program Coordinators conduct Program Monitoring													
Contractors receive AAA monitoring report													
Contractor signs AAA monitoring report and complete any corrective action													
AAA provides technical Assistance													