Monroe County Commission on Aging Policy Catalog

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The following document, “Doing Business With Us”, serves as an official guide for organizations currently and prospectively contracting to provide services funded by the Monroe County Commission on Aging:

**Doing Business With Us**

The Monroe County Commission on Aging is a county governmental agency that funds and works with public, private for-profit and non-profit businesses to provide community based services for persons age 60 and over that are Monroe County residents.

**Function**

The Commission on Aging does business with service providers through fee-for-service contracts.

This section contains general protocol for the fiscal management of Commission on Aging agencies.

**Authority**

- The Constitution of Michigan of 1963 Article 4 Section 51
- Michigan Public Act 39 of 1976

**Fee-for-Service**

Fee-for-Service contracts are awarded to agencies that make application to the Commission during the application period. Fee-for-Service contracts are generally awarded on an hourly or unit basis, based on type of service and market rate.

**Application Time Line**

The Commission generally accepts funding applications annually during a specified application period. If a funded service has lapsed or an unmet need arises, the Commission will entertain applications at other times of the year.

**Commission on Aging Contract Fiscal Management**

**Contract Reporting**

Agencies receiving funds are required to submit monthly financial and programmatic reports to the Commission on Aging office. Agencies must submit monthly and year-end programmatic and financial reports showing how millage money is spent. These reports need to be entered into the PeerPlace System no later than the 25th of the following month in which they are due. Calendar year end reports are due to the Commission on Aging office on or before February 25th of the new year. The Commission on Aging staff will check to make sure that all reports are received from the agencies by the due date. Agencies failing to submit reports by the due date
are reported to the commission for disciplinary action. The Commission on Aging staff will prepare a written report to present to the full Commission on reporting compliance.

**Agency Payment**

Agencies receive payment within ten (10) days of generation of a full detailed invoice.

Deviations to agency payments can include the following:

1. If a contract has been suspended, the Commission on Aging Director will be directed by the Commission on Aging that no payments shall be made to the agency until the funding suspension has been lifted.

2. If an agency has not entered reports into the PeerPlace system or has had late reports one or more months, the Commission on Aging Director will notify the Commission on Aging.

**Year End Reporting**

The final report for the previous year ending is due to the Commission on Aging office by February 25th of the new year. This final year-end report does not replace the December monthly reports.

After February 25th, the Commission on Aging Staff will review all of the reports for accuracy. The review will include the following:

1. Reporting of revenue and expenses against budget and Commission on Aging accounting records.

2. Program income/cost sharing is reported.

If the report is inaccurate, the Commission on Aging Assistant will notify the agency and request a corrected report.

1. If reporting shows overpayment for the year, due to incorrect reporting or billing errors, a refund of the balance will be requested in writing.

2. At the discretion of the Commission on Aging, any agency that does business with the Commission on Aging must submit to a third party audit of the Commission’s choosing for audit of the commission’s funds.

*Any agency wishing to do business with the Monroe County Commission on Aging should refer to the Monroe County Commission on Aging Funding Rules and Regulations and the Monroe County Commission on Aging Operating Guidelines for Service Programs for the full detail on Doing Business with the Commission.*
The following 25 items serve as an official record of the funding rules and regulations for agencies funded by the Monroe County Commission on Aging:

**The Monroe County Commission on Aging**

**Funding Rules and Regulations**

1. To be funded, programs must serve seniors age 60 and older who are residents of Monroe County.

2. Agencies providing programs and services receiving County Millage Funding must submit monthly and year-end programmatic and financial reports showing how all program funds were spent. These reports need to be entered into the PeerPlace System no later than the 25th of the following month in which they are due. Calendar year end reports are due to the Commission on Aging office on or before February 25th of the new year. Programmatic reports must show number of units and clients served as well as the program income generated by the program.

3. Agencies must report immediately the discontinuation of a millage-funded program in writing to the Commission on Aging no less than three weeks before the program is discontinued.

4. Agencies making staff changes during the year that are funded by the Commission on Aging are required to notify the Commission on Aging of their intent to change or restructure staffing before the changes are implemented. If the change requires a line item transfer, a written line item transfer notification and revised budget spreadsheets must be submitted one week prior to the transfer indicating the issues requiring the redirection of funds. Once transfers are applied, revisions must be entered into PeerPlace. Failure to comply will result in suspension of funding.

5. Commission on Aging agencies who publish newsletters are required to publish the following disclaimer on their newsletters: “Views and comments expressed in this newsletter are not necessarily the views and comments of the Monroe County Commission on Aging. The Monroe County Commission on Aging is a governmental agency, which funds community senior programming through millage dollars.”

6. Payment to Monroe County Commission on Aging Fee for Service funded agencies is based solely on reimbursement for units of service provided and governed by annual contracts for service. Agencies are, however, required to submit line-item budgets and report monthly expenditures into Peerplace indicating how all program funds are spent. Agencies
are not required to return funds to the Monroe County Commission on Aging if budgeted line-items are under spent at year end. Excess funds received due to the incorrect reporting of units served or billing errors will be deducted from payments for future units served until the balance is reconciled. If all Commission on Aging designated funds are expended prior to the end of the budget year, agencies are required to continue to report units served from other sources in Peerplace.

7. Any funded agency that seeks outside grant funding for new programming shall have an alternative plan for continuance prior to the end of the grant. A millage-funded agency should not expect that the Commission on Aging will continue to fund programs and/or staff resulting from the implementation of new grant funding that is discontinued. A millage-funded agency may present their request to the Commission for new programming and match funding, as has been the practice in the past. It should not be expected that the Commission would fund any new programs over and above what it had funded during the current budget year. New funding to agencies is contingent upon available funding and current senior need.

8. Agencies requiring local match dollars from the millage for AAA 1-B grants must present a request in writing to the Commission on Aging Director one month prior to the regular scheduled Commission on Aging Meeting before the grant is due.

9. Agencies requesting to be placed on the Commission on Aging agenda at a regular scheduled or special meeting must submit their written request along with supporting documents for inclusion into the board packet no later than two weeks in advance of the meeting by 5 p.m. A representative of the agency must be present at the meeting for a request to be considered.

10. Agencies receiving millage dollars must sign annually the Commission on Aging Contract for Services.

11. Programs receiving millage funding must have a plan to recover cost share from the clients they serve.

12. Service agencies must maintain a record of the unduplicated number of clients served according to name, date of birth, age, street address, phone numbers, and municipality. The commission reserves the right to request this information at any time for administrative and billing purposes.

13. Agencies must submit to an independent third party audit of the agency showing full disclosure by program, all sources of revenue, expenses, program income, fundraising and fund balance/asset changes. The Commission’s funding must be clearly denoted under the revenue sources. A completed IRS 990 should also accompany the audit (if applicable). The Commission will pay for the cost of the audit.
14. Service agencies are encouraged to develop, support, and participate in local coalitions of
service programs in the County in order to avoid duplication of service and maximize
resources to the older adult.

15. Funded programs are required to report to COA staff how new clients learned about the
program.

16. All printed promotional literature regarding Senior Millage funded programs is required to
have the approved Senior Millage and Commission on Aging logos displayed.

17. Service agencies must have a procedure in place to gauge client satisfaction and provide it
upon request of the Commission on Aging.

18. Service agencies must have an emergency management procedure in place, which is
coordinated with the local Emergency Management Office and/or the AAA 1-B, for the
protection and/or evacuation of frail, disabled seniors and/or home care workers in the
event of an official disaster, a weather related crisis, or a hazardous environmental
condition. Client emergency management criteria must be entered in the PeerPlace System
and updated on a regular basis should any evacuation situation arise.

19. Service agencies must maintain a monthly record of units of service provided along with
type of service, and client demographic data and program income received. Services
provided by contracted agencies must be provided according to the approved Commission
on Aging service definition and contracted unit definition of service.

20. Service agencies must follow generally accepted accounting standards and meet any other
fiscal requirements established in the 45CFR Part 74, by OSA.

Education and Other Non-Profit Institutions” or “State and Local Governments”, which
require annual financial audits.

22. Matching funds for new programs and services are always considered. Matching dollars
and support are given to programs that target the needs of the most frail and low-income.

23. New programs should have a plan to become partially self-sufficient in the future in order to
be considered again for funding.

24. Agencies must continue to work on flexibility and innovation in programs and budgeting in
order to maintain the most competitive per unit cost of the service without compromising
service quality. Agencies must continue to look for additional sources of grants and revenue
as funding streams become diminished or exhausted.

25. These funding policies, procedures and regulations supersede all other policies and
guidelines previously written and dispensed by the Commission on Aging.
Monroe County Commission on Aging Audit Policy

Funded agencies of the Monroe County Commission on Aging shall submit to an independent audit funded by the Commission on Aging, by an auditor chosen by the Commission on Aging and reviewed under a schedule devised by the Commission on Aging.

Agencies receiving Commission on Aging funds shall provide to the Commission on Aging a revised budget, every time a line item adjustment in the agency’s budget occurs.
The following serves as the official disciplinary process for Monroe County Commission on Aging funded agencies:

**Probation, Suspension, and Termination Procedure for all Agencies**

I. **Relationship of Disciplinary Provisions**
Probation, Suspension and Termination are individual actions that may be taken by the Monroe County Commission on Aging, and should not be considered a progressive disciplinary process. The Monroe County Commission on Aging reserves the right to terminate any contract with or without cause.

II. **Probation**
*Definition:* A specified period of time within which the Agency must comply with specified terms of the contract and/or corrective actions identified by the Monroe County Commission on Aging.

A. When the Agency has failed to comply with the terms of the contract, the Monroe County Commission on Aging may place the Agency operations on probation.

B. The written notice of probation shall be sent in writing, shall contain reasons for probation, any corrective action required of the Agency, the effective date, and the right of the Agency to appeal.

C. During the probationary period, the Agency will continue to receive reimbursement for expenses incurred as part of the contract.

D. If, during the probationary timeframe, the Agency does not comply with the corrective actions, suspension or termination will be initiated.

III. **Suspension**
*Definition:* The discontinuation of payment to the Agency for a specific period of time.

A. When the Agency has failed to comply with the terms of the Contract, the Monroe County Commission on Aging shall suspend financial support to the Agency.

B. Before suspending Agency operations, the Monroe County Commission on Aging will notify the Agency in writing of the action being taken, the reason(s) for such action (including specific violations), the effective date, and the conditions of the suspension. This notice will be given at least ten (10) calendar days prior to the effective date of the suspension and will note the right of the Agency to appeal.
C. Under extreme conditions (such as danger to older persons or improper use of funds), the Monroe County Commission on Aging may give immediate notice of suspension.

D. New obligations incurred by the Agency during the suspension period will not be allowed unless the Monroe County Commission on Aging expressly authorizes them in the writing.

E. The Monroe County Commission on Aging may reinstate the suspended Contract operations if it determines conditions warrant such action.

F. Financial participation by the Monroe County Commission on Aging in reinstated Contract operations may resume immediately upon reinstatement, but will not cover any costs incurred for those Contract operations while they were suspended.

IV. Contract Termination

Definition: The complete cessation of contracted services and contract funding.

A. The Monroe County Commission on Aging may terminate support for the Contract prior to the end of an approved budget year with or without cause.

B. The Monroe County Commission on Aging, acting as an advocate for the senior citizens of the county, is charged with the prudent spending of public funds to promote the health, dignity and independence of seniors. Any funded agency receiving Commission on Aging senior millage dollars can expect contract termination for the following. The listed examples are by no means intended to be wholly inclusive:

1. Funds are unavailable.
2. The Agency violates conditions under which the Contract was approved.
3. Agency fails or inadequately complies with reporting requirements.
4. Program performance is deficient.
5. Assessment findings are inadequate.
6. Agency fails to submit to Financial Audit of Accounting.

C. To terminate the Contract, the Monroe County Commission on Aging will notify the Agency in writing of the contract termination and of the Agency’s right to appeal and the procedures to be followed for such appeal.

D. Under extreme conditions (such as gross negligence or misappropriation of funds) immediate contract termination may be initiated.

E. When financial support of the Contract terminates on or before the end of the approved Contract period, the Contractor shall complete and submit a final financial report to the Monroe County Commission on Aging on the established due date.
F. When the Contract is terminated, equipment and supplies purchased with Monroe County Commission on Aging funds must be disposed of in accordance with procedures prescribed by the Monroe County Commission on Aging.

G. An agency may terminate a Contract upon fifteen (15) days written notice to the Monroe County Commission on Aging prior to the completion of the Contract.
The following serves as the official procedure for agencies requesting new funding:

Monroe County Commission on Aging New Funds Request Protocol

1. To be funded, programs must serve seniors age 60 and older who are residents of Monroe County.

2. In order to submit a request for funding at a time other than our normal funding cycle, agencies must first contact the Commission on Aging office for instruction. A full application for funding, along with financial budget spreadsheets need to accompany the request.

3. An agency requesting new funding must also submit a letter to the Commission on Aging requesting consideration for the funds. This letter will serve as a request to be placed on the next regular meeting agenda of the Commission on Aging for consideration. A request will not be considered without a full application showing how the provider will use the funds requested. Any other supporting documents should also be submitted at that time. Requests for the purchase of equipment and/or services must include three bids for comparison. Applicants requesting to be placed on the Commission on Aging agenda at a regular scheduled or special meeting must submit their written request along with supporting documents for inclusion into the board packet no later than two weeks in advance of the meeting by 5 p.m.

4. At the next regular Commission on Aging meeting, the Commission will review the request and make a recommendation at that time. The agency making the request will be notified after the meeting of the disposition of the request.

5. If an application is received and approved for funding midyear, all of the Commission on Aging Funding Rules, Guidelines, Policies, Procedures, Auditing and Reporting requirements must be adhered to as well as execution of the Commission on Aging contracts.
Title: Operating Guidelines for Service Programs
Adopted: 12-12-2007
Revised: 05-08-2013

The following serves as the official guidelines of operation for Monroe County Commission on Aging funded agencies:

The Monroe County Commission on Aging
Operating Guidelines for Service Programs

Contractual Agreement:
A. All services funded by the Commission on Aging are to be provided under an approved contract. Each agency entering into a contract with the Commission on Aging must comply with all program requirements established by the Commission.

B. Assignment of responsibilities under the contract or execution of subcontracts involving a third party must be approved in writing by the Commission on Aging.

Compliance with Service Definitions:
Each service program must adhere to the definition and minimum standards to be eligible to receive reimbursement of allowable expenses.

Eligibility and Targeting of Participants:
Services shall be provided to Monroe County seniors 60 years of age or older. Greatest emphasis shall be given to the service of eligible seniors with the highest degree of social, physical and economic need. Greatest emphasis is defined as the effort to service a greater percentage of older persons with the highest degree of frailty and need in relation to the total elderly population within the Monroe County Area. Each provider must be able to specify and provide service for the needs of low-income individuals in the Monroe County Area.

Wait List or Requested Service not Provided:
A. Where financial resources are insufficient to meet the demands of the persons needing service, a written policy for prioritizing clients shall be developed. This policy shall prioritize clients at a minimum by frailty, homebound because of illness, incapacitating disability, or otherwise isolated.

B. Each agency must keep a written list of people placed on a waiting list and eligible people that requested service that was not provided. The list must contain the person’s name, the date the person requested service, the type of service requested, the reason the service was not provided at the time of request, and the person’s zip code. An updated list is to be submitted to the COA by the 25th day of each month.
**Contributions:**

A. All program participants shall be encouraged to and be offered a confidential and voluntary opportunity to contribute toward the cost of the service received. Donations are strictly on a voluntary basis, unless a fixed cost has been established and approved by the Commission on Aging and the agency being funded.

B. Except for program income, no paid or volunteer staff person of any service program may be allowed to solicit or accept contributions or gifts from program participants, offer for sale any type of merchandise or service, or seek to encourage the acceptance of any particular belief or philosophy by any program participant.

C. Each agency program must have a written policy in place for handling all donations/contributions upon receipt from the senior which must include the following: Documented signatures of staff receiving donations, procedure for maintaining confidentiality, and collection records to balance program income.

**Confidentiality:**

Each agency must have policies in place to provide maximum confidentiality of information for each and every senior that is served. The policy must ensure that no information about an older person is disclosed without the informed consent of that person or their legal representative. Disclosure may be allowed by court order, or for program monitoring by authorized state, federal or local agencies, which are bound by the same applicable confidentiality responsibilities, so long as access is in conformity with the Privacy Act of 1974. All information on clients should be maintained in controlled access within the agency.

*Note: Health Insurance Portability and Accountability Act (HIPAA) Guidelines may also apply. (It is the responsibility of each service agency to determine if they are a covered entity under HIPAA)*

**Referral and Coordination Procedures:**

A. Each service provider shall demonstrate a working relationship with other community agencies for referrals and resource coordination to ensure that seniors in need of service from other agencies have information on how to access such other services. Each program must be able to show linkages with other agencies providing services within the County such as:

1. Case coordination
2. Information and referral
3. Outreach and resource advocacy
4. Transportation
5. Meals

B. Each agency must publicize their services in order to assure access to seniors in the County and shall use a system, which prioritizes the clients according to highest degree of frailty and need. Agencies must assist seniors in directing them to authorized officials.
in situations where imminent danger is present. Each provider must be prepared to assist seniors in providing essential service in weather related emergencies.

**Insurance Coverage:**
Each program shall carry insurance policies, which indemnify loss of local resources, due to casualty, employee theft, and fraud. All equipment, supplies and other property purchased in whole or in part with county millage dollars are to be covered with sufficient insurance to reimburse the program for the fair market value of the asset at the time of loss.

**Volunteers:**
Each program utilizing volunteers shall have a written policy governing the recruiting, training, and supervising of volunteers. Volunteers shall receive a written job description, orientation training, and a yearly performance evaluation, if appropriate.

**Staffing:**
A. Each program shall employ qualified personnel sufficient to provide services pursuant to the budgetary agreement. Each program shall be able to demonstrate an organizational structure including established lines of authority.

B. Each program shall have a written policy showing the process for conducting reference checks.

C. Each program must require and shall have a written policy showing the process for conducting criminal background checks through the Michigan State Police for all employees and volunteers that enter client homes.

D. Each program that employs workers who enter a client’s home to perform in-home services must secure a signature from the client, family member or proxy of the client that the service was indeed performed. The worker’s signature must also appear on the form that service was performed. These worker/client service sheets are subject to audit by the Commission on Aging.

**Staff Identification:**
Every program staff person, paid or volunteer, who enters a senior’s home must display proper identification, which is either an agency picture identification card or a Michigan drivers license and some other form of agency identification.

**Training Participation:**
A. New program staff must receive an orientation, which includes, at a minimum, introduction to the program, aging services in the community, maintenance of records and files, ethics and emergency procedures. Appropriate records shall be kept in the employee’s personnel file.
B. Each program that provides in-home service must have an annual training program on the observation, identification, reporting and recording information on abuse and neglect of seniors.

Complaint Resolution:
Each program must have a written complaint resolution procedure for use by senior recipients. Each program must also have a written appeals policy for individuals determined to be ineligible for services or for individuals who have services terminated. Persons denied service and recipients of service must be notified of their rights for complaint resolution within the agency or by filing a report with the Commission on Aging, AAA 1-B, the U.S. Department of Health and Human Services, Office of Civil Rights or the Michigan Department of Civil Rights.

Civil Rights Compliance:
Each program must not discriminate against any employee, applicant for employment or receiver of service due to race, gender, color, religion, national origin, age, sexual orientation, height, weight or marital status.

Equal Employment Opportunity ACT:
Each program must comply with equal employment opportunity and affirmative action.

Universal Precautions:
Each program that has occupational exposure of employees to blood or other potentially infectious materials must instruct employees on the proper use of universal precautions.

Drug Free Workplace:
The unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited in all service program workplaces. Each program must operate in compliance with the drug-free work act of 1988.

Americans With Disabilities ACT of 1990:
Each program must operate in compliance with the Americans with Disabilities Act.

Family and Medical Leave ACT of 1993:
Each program must comply with the Family and Medical Leave Act of 1993.

Workplace Safety:
Each program must operate in compliance with the Michigan Occupational Safety and Health Act (MIOSHA).
Title: Service Recipients Grievance Procedure  
Adopted: 10-11-2017  
Revised: N/A

The following serves as the official procedure for grievances from service recipients of all Monroe County Commission on Aging funded agencies:

Service Recipients Grievance Procedure for All Agencies

I. Right to Grieve
A. Any older adult or his/her representative, who has been denied service, has had service terminated, or perceives unfair treatment by a Monroe County Commission on Aging funded service Agency, may file a complaint or grievance with the organization in question, in accordance with that Agency’s established procedure.

B. Should the matter be unresolved through the service agencies grievance procedure, a grievance may be filed with the Monroe County Commission on Aging. The complainant must submit a written statement of the grievance within ten (10) calendar days of completion of the final step of the service agencies grievance procedure. The statement must include; the date of the incident, the agency/personnel involved in the incident, and an explanation of the incident which led to the complaint.

C. A grievance filed against a provider of legal services while the complainant’s legal case is still open, will be held until the legal case is closed by entry of a final judgment or dismissal with prejudice and the expiration of all appeal periods. In this case, the service agency will be instructed to inform the Monroe County Commission on Aging immediately upon the closure of the case.

II. Grievance Process Informal Inquiry:
1. The Monroe County Commission on Aging staff will meet with the older adult or his/her representative, and a representative of the service agency involved, within ten (10) calendar days of receipt of the written grievance statement, to discuss the issues involved in the complaint. Information on which the grieved action was based will be reviewed at this time, in an effort to resolve the complaint.

2. Should the complaint be unresolved through the informal inquiry, the Director will contact the Chairperson of the Commission on Aging to appoint a three member Grievance Committee for review and recommendation. The Committee must be appointed within 30 calendar days.

III. Formal Complaint Grievance Procedure:
A. Meeting of the Grievance Committee
Three members of the Commission on Aging (COA), appointed by the Chairperson, will sit on the committee.
B. Investigation of All Written Complaints
   1. Copies of the complaint will be provided to this committee.
   2. The committee will initiate an investigation as follows:
      a. Make necessary contact with the complainant
      b. Make necessary contact with the agency/personnel involved in the complaint
      c. Document the findings and make a recommendation within 30 calendar days
      d. Provide a written report of the findings to the Chairperson for action at the next regular scheduled meeting

C. Action of the COA Following the Investigation
   1. The written report and recommendation will be reviewed by the COA at their next regular scheduled meeting
   2. A decision will be made by roll call vote of the COA
   3. The vote of the COA will be final
Title: COA Fund Balance  
Adopted: 09-10-2003  
Revised: 01-08-2014

Monroe County Commission on Aging  
Fund Balance Policy

The Monroe County Commission on Aging shall maintain a fund balance for the purpose of offsetting revenue shortfalls and economic downturns. The amount of the fund balance shall be determined during the annual budgeting process with 8% of budgeted expenditures used as the targeted amount.
Monroe County Commission on Aging funded agencies are to include the following disclaimer in their newsletters:

The Monroe County Commission on Aging Disclaimer Statement

“Views and comments expressed in this newsletter are not necessarily the views and comments of the Monroe County Commission on Aging. The Monroe County Commission on Aging is a governmental agency, which funds community senior programming through millage dollars.”
Policy #: MCCOA 11-10

Title: Agency Funding Advances
Adopted: 11-09-2011
Revised: N/A

Due to the nature of the fee for service funding system, it may be necessary for the Monroe County Commission on Aging to provide funding in advance of services provided by contracted agencies. The following outlines the process in these instances:

**Agency Funding Advances**

I. Initial Change to Fee for Service from Allocation Funding

In the event that an agency changes to fee for service funding from allocation funding, the agency is eligible to receive an advance in funds in order to allow for the appropriate provision of services. One-twelfth of the agency’s designated annual funding amount may be provided the first week of each month for up to three months following the agency’s change to fee for service. At the time, the agency determines the advanced funds are no longer necessary, or after three months has elapsed, the following process will be used to reconcile the difference:

1. The Commission on Aging will calculate the cost of the number of units served and subtract this amount from the total dollar amount of the advanced funds provided.

2. In instances where the advanced funds exceed the cost of the units provided, the Commission on Aging will withhold reimbursement for future units until the total of the advanced funds is equal to the units of service provided.

3. In instances where the cost of the units provided exceeds the total of the advanced funds, the Commission on Aging will provide reimbursement for the full amount of units provided.

II. Newly Funded Agencies

In the event that an agency has not received prior funding from the Commission on Aging, the agency is eligible to receive an advance in funds in order to allow for the appropriate provision of services. One-twelfth of the agency’s designated annual funding amount may be provided the first week of each month for up to three months following the agency’s initial provision of services. At the time the agency determines the advanced funds are no longer necessary, or after three months has elapsed, the following process will be used to reconcile the difference:

1. The Commission on Aging will calculate the cost of the number of units served and subtract this amount from the total dollar amount of the advanced funds provided.

2. In instances where the advanced funds exceed the cost of the units provided, the Commission on Aging will withhold reimbursement for future units until the total of the advanced funds is equal to the units of service provided.

3. In instances where the cost of the units provided exceeds the total of the advanced funds, the Commission on Aging will provide reimbursement for the full amount of units provided.
Policy#: MCCOA 11-11

Title: Noncompliance
Adopted: 02-08-2006
Rescinded: 11-09-2011

As of 11-09-2011, Policy # MCCOA 11-11 has been rescinded and is no longer in effect. Refer to Policy# MCCOA 11-04 for current Commission on Aging policy regarding Noncompliance.
Title: Non-Monroe County Residents & Clients Under 60 Years Old
Adopted: 07-12-2012
Revised: N/A

Non-Monroe County Residents & Clients Under 60 Years Old

The language of the Monroe County Senior Citizens Millage expressly prohibits the use of funds to provide services to Non-Monroe County residents and clients under the age of 60. The following outlines the process to be used to prevent the expending of funds in this manner:

1. In order to receive reimbursement for services provided, each program must provide the complete residential address and date of birth of all clients served.

2. Commission on Aging staff will review the address and date of birth of all clients served in order to ensure that all are Monroe County residents and at least 60 years old at the time of service.

3. If a client has an address listed that is outside of Monroe County or has a date of birth that indicates that they were less than 60 years old at the time of service, Commission on Aging staff will submit the information to the provider for correction or removal prior to processing payment.

4. If it is determined that a provider received payment for services provided to a non-Monroe County resident or a client under 60 years old, the amount of the payment will be deducted from the next monthly payment issued to the provider.
Title: Reporting of COA Funded Meals
Adopted: 10-10-2012
Revised: N/A

Reporting of COA Funded Meals

In order to determine an accurate count of all meals provided in Monroe County with COA funds, the following process is to be used by contracted service providers that utilize COA funds for any meal related costs:

1. All contracted service providers that utilize COA funding for the provision of meals will identify and record the number of meals provided to Monroe County residents 60 years of age and older.

2. The number of meals provided by each contracted service provider will be reported to the COA staff on a monthly basis.
Title: Record Content and Retention  
Adopted: 10-10-2012  
Revised: N/A  

Record Content and Retention

Per COA contracts for services, in order to be eligible for reimbursement for services provided, all COA funded programs are required to be able to provide documentation, “which would tend to support that such services were provided and to whom such services were provided.” This policy indicates further details regarding the content and retention of service records.

Documentation sufficient to support the provision of services must be maintained and available for review by the COA for a minimum of three years from the date of service and contain information to support the following:

1. The name of the service recipient  
2. The birth date of the service recipient  
3. The residential address of the service recipient  
4. The date the service was provided  
5. The amount of service provided  
6. The type of service provided
Policy #: MCCOA 13-01

Title: Contingency Account
Adopted: 04-10-2013
Revised: 02-12-2014

Contingency Account

A Contingency Account shall be established in the annual Commission on Aging budget. Funds assigned to this account shall be used to make supplemental appropriations for unanticipated matters brought to the Commission on Aging that require consideration during the course of the budget year. The target amount of the annual budget Contingency Account shall be two percent (2%) of the total annual budgeted expenditures.
Title: Conflict Of Interest  
Adopted: 09/11/2013  
Revised: 08/13/2014

The following provisions are designed to preclude the use of membership on, or employment with, the Monroe County Commission on Aging (COA) for purposes which are, or give the appearance of being, motivated by a financial interest in, a relationship to, and/or involvement in an issue that is presented to the Board for action:

1. For purposes of applying the following rules as conflict of interest, a conflict shall exist under the following conditions:

   a. The board or staff member has, or within the twelve months preceding the vote had, an ownership, employment, contractual, or fiduciary relationship in regard to the matter to be considered.

   b. The board or staff member is a member of an agency board, or agency committee and the decision of the Commission on Aging will directly affect that agency, its program, its budget, and/or its funding from the Commission on Aging.

2. Board members of the COA or any of its organizational units with conflicts of interest may participate in the discussion of a matter in which they have an interest, but in no case shall be allowed to vote on that matter.

3. Staff members shall not engage in activities that would constitute a conflict of interest.

4. Prior to a matter being considered at a meeting, disclosure of a conflict of interest shall be announced at the meeting by the person(s) having an interest as defined above.

5. The recording Secretary of the Commission on Aging shall note in the minutes of the meeting that the conflict of interest has been disclosed and that the Board member has not voted on the issue.

6. Questions regarding conflict of interest shall be settled by majority vote of the COA.
Title: Service Definitions and Minimum Requirements
Adopted: 5-14-2014
Revised: N/A

The Monroe County Commission on Aging Board maintains the responsibility for the adoption and revision of service definitions and minimum requirements to be followed for all Monroe County Senior Millage funded services. All approved service definitions and minimum requirements are to be compiled in the Monroe County Commission on Aging Service Definition and Minimum Requirements Manual.

Adoption and/or revision of any service definition or minimum requirement shall be made only by action of the Monroe County Commission on Aging Board.

Interpretations of the applicability of any service definition or minimum requirement shall be made by the Director of the Monroe County Commission on Aging, or his/her designee, in response to a written inquiry. All interpretations will be brought before the Commission on Aging Board for review at the next regularly scheduled Board meeting.
Title: Organizational Meeting Procedures
Adopted: 04-08-2015
Revised: N/A

For its Organizational Meeting, The Monroe County Commission on Aging shall meet on the second Wednesday of January that is not designated a County holiday, or at another reasonable day and time fixed by the Commission on Aging Director, the Commission on Aging Assistant, or any Commission on Aging Board member.

The purpose of the Organizational Meeting shall be to elect a Chairperson, Vice-Chairperson, and any other designated officers, and administer oaths if necessary. The Board may also transact any other business properly brought before it.

The Director or Assistant shall act as the moderator of the Organizational Meeting until such time as the Chairperson of the Board is elected, after which time, the Chairperson shall preside at said meeting. If the Chairperson is not present, then the Vice-Chairperson shall preside after being elected.

The Organizational Meeting shall be held in the Commission on Aging Board Room, unless otherwise notified per the requirements of the Open Meetings Act, and shall be held in accordance with the Open Meetings Act.

The following process shall be used for the election of Commission on Aging officers:

1. The Director, Assistant, or Chairperson (following election) will call for nominations to be made by any Board member.

2. The Director, Assistant, or Chairperson will close the nominations after all Board members have had an opportunity to present their nominations.

3. If only one Board member is nominated, the Director, Assistant, or Chairperson will call for a motion to declare that person to be elected, and if a majority of the Board members are in favor of the motion, that one person nominated shall become the Chairperson, Vice-Chairperson, or other designated officer.

4. If more than one Board member is nominated for a designated office, the Director, Assistant, or Chairperson will call the roll of all Board members, in any order that the Director, Assistant, or Chairperson determines, where each Board member shall, by a public voice vote, declare his or her preference for the designated office being considered, and if one of the nominees receives five (5) affirmative roll call votes, that person shall immediately be declared that designated officer by the Director, Assistant, or Chairperson and no further motion or vote shall be necessary.
5. If there are three or more nominees and the first roll call vote does not produce one nominee getting at least five (5) affirmative roll call votes, the Director, Assistant, or Chairperson will call for a second roll call vote for the top two vote getters only, and the one of those two who receives five (5) affirmative roll call votes shall immediately be declared the designated officer by the Director, Assistant, or Chairperson. If because of tied votes, there are more than two nominees who are the top two vote getters, then all said nominees who were the top two vote getters shall continue to be nominees, and all of those nominees that do not qualify as being the top two vote getters shall be eliminated. Roll call votes shall be continued until one nominee receives at least five (5) affirmative roll call votes.
Title:        Consent Agenda
Adopted:     04-08-2015
Revised:     N/A

Consent agenda items may be included within the Boards regular order of business. Any member of the Board may request any consent agenda item to be removed for discussion and brought before the Board for separate action and vote. Removed items shall be taken up immediately after the consent agenda or placed later on the agenda at the discretion of a majority of the Board members present. Otherwise, all consent agenda items after voted on by motion and roll call, shall be adopted as if read and acted upon individually.
Title: Program Compliance Evaluation
Adopted: 07-08-2015
Revised: N/A

The following procedure will be used to annually evaluate the compliance of COA funded programs regarding supporting documentation for the billing of services.

1. COA staff will determine and utilize a process to randomly select five percent of the clients served by each program and a service billed to the COA for each client selected.

2. The COA Director or his designee will conduct an evaluation requesting that each agency provide agency documentation verifying the following information for each client and service selected:
   A. The birth date of the service recipient
   B. The residential address, city, state, and zip code of the service recipient
   C. The date the service was provided
   D. The amount of service provided
   E. The type of service provided

3. Following the evaluation, COA staff will issue a report to the agency evaluated, indicating any instances where billing information was not supported by the agency’s documentation, referred to as “findings.”

4. Upon issuance of the report, the agency will be given 30 days to offer a “Response” that either A) disputes any findings in the report or B) provides a plan to address any findings in the report. Failure to respond will result in further action.

5. The original COA report and response from the agency will be submitted to the COA Board for review and disposition if necessary.

6. Any findings that result in an unauthorized payment to the agency require reimbursement to the COA within 30 days of notice.