



Grants Policy Manual

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I. GRANT OVERVIEW

A. Introduction

- i. The Grants Policy Manual (GPM) sets DACL's requirements and expectations of grantees, from grant award to grant close-out. It explains the administrative, operational, and financial responsibilities of all entities receiving DACL grant funds.
- ii. All DACL grantees must follow the GPM's policies and procedures for DACL-funded grant programs, along with specific directives, instructions, DACL policy memoranda, and any applicable District and federal employer requirements.¹
- iii. If a grantee receives federal funds as part of its DACL grant, the grantee must know and understand any federal requirements that may be in addition to DACL's requirements.
- iv. Grantees must read and understand the entirety of their grant obligations.
- v. Grantees should reach out to their assigned grant monitor with any questions or concerns throughout the grant process.

B. Grant Relationship

- i. Grants establish a formal relationship between DACL and grantees to provide activities, programs, and services for seniors ages 60+, people with disabilities, and caregivers.
- ii. DACL grants are governed by the GPM, Notice of Grant Award (NGA), terms and conditions, service standards, the City-Wide Grants Manual and Sourcebook², and applicable DACL policies and directives.
- iii. By accepting the grant award, grantees agree to abide by all applicable District and federal laws, regulations, and policies and procedures.
- iv. Grantees operate the proposed activities, programs, and/or services in the accepted proposal, subject to DACL oversight.

C. Grant Authority

- i. DACL administers grants funded through District-appropriated funds and federal funds. DACL's direct services and the programs it oversees enable seniors to have and maintain maximum independence and dignity in a home environment with appropriate supportive services.³

¹ This includes but is not limited to the District's living wage requirements, local and federal laws and regulations on nondiscrimination, and equal opportunity employment.

² See <https://opgs.dc.gov/sites/default/files/dc/sites/opgs/publication/attachments/Revised%20Sourcebook2016%20%28003%29.pdf> (last accessed 22 Jul 2020).

³ See DC Code § 7-503.03 (“[T]he Director [of DACL] shall...[c]ontract with, and make grants to, public and private agencies using Older Americans Act funds, other federal funds received by the Department, and District government appropriated funds[.]” See also 2 CFR § 200.331 (“All pass-through entities must...[e]nsure that every subaward is clearly identified to the subrecipient as a subaward and includes [certain] information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification.”)

- ii. DACL has grant-making authority to award grants to qualified applicants in the District of Columbia. DACL grant funds come from District government appropriated funds and federal government grants.

D. Notice of Grant Award (NGA)

- i. Grantees approved for grant awards will receive a transmittal letter and an NGA that contains the terms and conditions that apply to the award, any special conditions and performance standards that apply, any available forms for reporting programmatic and financial activities and to request funds, and any conditions for amendment and/or termination of the grant.⁴

E. Grant Period

- i. The grant period is the time indicated on the NGA during which allowable expenses may be incurred, committed, and expended. Most DACL grants are for a one-year period conforming to the fiscal year of the DC government from October 1 - September 30. DACL does not authorize any costs outside the grant period. All services, products, and expenses for products and services incurred before or after the grant period are not reimbursable to the grant. Continuation grants, if any, require an approved continuation application, and will be in the form of a new grant, with a new purchase order number, and NGA.
- ii. Some federal grants begin or end at a date different from the DACL fiscal year. Regardless of the beginning date of the grant period indicated on the NGA, all grant periods will end on September 30, the end of the DC fiscal year, to meet the requirements of the City's budget process. A continuation grant may be authorized to complete the remainder of the grant project if it was not completed during the date indicated in the NGA.
- iii. Costs incurred under the prior grant and/or the prior grant period cannot be transferred to the new grant. All services must be rendered, and costs and products delivered, received, and paid by September 30 of each fiscal year. The remaining funds cannot be transferred to a new grant. DACL reserves the right to reduce the grant award if funds remain at the end of the grant period. A decision to de-obligate funds from a grant will be based on year-to-date (YTD) expenditures and projections for the remainder of the year. This process will start during the second part of the fiscal year.

II. GRANT ADMINISTRATION

A. Monitoring Project Performance

- i. Grantees are required to adhere to the terms and conditions of the NGA. Grantees must monitor all aspects of grant performance, including all subcontracted work that is provided via other entities as part of the grant program.
- ii. Grantees must maintain accurate documentation for all expenditures and actions

⁴ *Id.* §10.1.

taken under the grant and shall develop policies, processes, and implement practices that provide for quality assurance.

- iii. DACL monitoring of grant compliance and performance includes, but is not limited to, observation, interviews, collecting and reviewing reports, documents, and data, and any other appropriate activity. Monitoring efforts determine the grantee's level of compliance with District and/or federal requirements and identify whether the grantee's operational, financial and management systems and practices are adequate to account for program funds.⁵
- iv. DACL will make announced and unannounced site visits during normal operating hours to monitor the grant. Grantees and their agents shall cooperate with DACL representatives at any such site visit. DACL shall issue a site visit report following a formal site visit, identifying findings, concerns, recommendations, required corrective actions, and/or taking other action as necessary. Grantees should expect at least two site visits each fiscal year.

B. DACL Service Standards

- i. DACL has established service standards (updated periodically) for each DACL-funded grant program, which establishes minimum requirements that grantees must meet for each service to obtain reimbursement. Each program service standard includes the following provisions:
 - a. Service Definition: describes the activities constituting the service under the grant, explains the purposes of the service, and lists the eligibility criteria.
 - b. Service Objective: the primary accomplishment that is expected to be achieved by providing service to individuals.
 - c. Service Unit: the quantitative measure of the activity provided.
 - d. Service Area: identifies the scope of clients and the geographic area covered by a service.
 - e. Service Location: describes the type of facility in which the service is provided.
 - f. Service Priorities: identify the service's primary target recipients.
 - g. Service Requirements: the minimal requirements that the grantee must provide or achieve.
 - h. Prohibited Service Components: activities that are not reimbursed for that service.
- ii. Outcomes to be achieved by the provision of the service, performance goals, and

how it will be monitored and measured.

- iii. Documentation and reporting requirements and frequency – monthly reports are due on the 15th of the following month, other than at the end of the fiscal year when all reports must be submitted by October 10th.

C. Grant Changes

- i. Circumstances within DACL, the District, and/or the grantee organization may require the grant to change during the grant period. Grantees must provide as much notice as possible to DACL before any change that materially affects the grant
- ii. All changes to the grant approved by DACL will be approved in writing. If DACL disapproves of the proposed changes, it may suspend, discontinue, or terminate the grant if it would have a significant negative impact on the terms of the grant.
 - a. Changes in Scope and/or Objectives

Where circumstances warrant a change in the grant's scope or objectives, the grantee must discuss the proposed change(s) with DACL. The grantee must obtain DACL's written approval at least 30 days before the proposed implementation date, stating the reason for the change, revised scope or objective, effective date, the impact on the services provided and clients served, any personnel implications, and, as appropriate, the budget impact. If 30 days advance notice is impossible, the grantee must discuss the proposed change(s) with DACL as soon as possible, at least within 24 hours or the next business day from the time it received notice that the grant should change.
 - b. Changes in Facility or Site

If a change of location for a grant could a disrupt service, including but not limited to temporary closure for renovation or a permanent location move, the change is a significant event requiring prior written approval. Grantees must notify DACL as soon as the need to change locations is apparent. Grantees must request approval, including the reason, and description of the alternate site selected, and others considered, the timing of the move, the impact on services to its existing and prospective clients, impact on client transportation, any projected drop in attendance anticipated and plans to address it, and any changes to the grant budget arising from the change in facility or site.
 - c. Changes in Key Personnel

Key Personnel positions vary depending on the program. DACL identifies the key personnel. Key Personnel includes the Project Director, Assistant Project Director (if applicable), or people functioning in these capacities, regardless of title, any professional position, including but not limited to a social worker, nurse, case manager, nutritionists, program or volunteer coordinator, or any position for which the incumbent must possess a license or certification, such as site managers. Grantees must notify DACL in writing within 24-hours when there is a vacancy in a key personnel role and provide

notice to DACL of the interim replacement. Permanent hires or promotions to key personnel roles are subject to DACL approval.

d. Vacancies

Grantees should fill grant-funded vacancies as soon as possible. A position that has been vacant for more than 2 months is subject to removal from the grant along with the associated salary.

When the grantee anticipates and/or identifies a Key Personnel vacancy, it must notify DACL as soon as possible (and no less than 24 hours or the next business day) describing what steps it is taking to fill the position and to maintain services in the interim. Grantees must submit resumes of at least three applicants to Key Personnel positions to DACL before making an employment offer.

e. Extended Absence of Project Director

Grantees must notify DACL for all scheduled absences greater than one-week of the Project Director and specify what arrangements are being made to carry out the project in the interim. The grantee must notify and provide DACL in writing with a point of contact during the absence. If the Project Director will be absent cumulatively for more than 3 months during the grant year, the grantee must notify DACL, state what arrangements are being made in that person's absence and the impact on the grantee's ability to carry out the project and related administrative requirements. If the grantee chooses to retain the individual as Project Director despite a cumulative absence of more than 3 months during the grant year, the grantee must obtain written approval from DACL.

f. Changes in FTE(s) Devoted to the Project

A significant drop in personnel hours spent on the grant or a change in the personnel structure may impair a grantee's ability to carry out the grant. A grantee must submit a written request if it plans to reorganize the personnel structure. Any reduction of 25% of one FTE or the elimination of any Key Personnel positions is considered "substantially less" than what was approved. A lesser reduction of the total FTE(s) may trigger the requirement to request approval of the change from DACL if it has a significant impact on the grantee's ability to carry out grant objectives. A grantee must explain how it intends to meet the grant objectives with the reduced staff time or revised personnel structure.

g. Changes in Contractors and Consultants

Grantees must submit a written request for any change in contractors or consultants paid using DACL funds. Grantees must comply with Procurement standards in retaining contractors and consultants.⁶

h. Changes in the Grant Budget

Grantees will not be reimbursed for expenses not in the approved budget at

⁶ 2 CFR § 200.459

the time of the expenditure. Grantees must make budget revision requests in writing, explain how the revised budget changes will impact clients served and services, include a detailed explanation of proposed changes by cost category and amount, and specify any proposed changes in the grantee share and DACL share by cost category.

i. Requests to Increase Grant Award

A grantee with a specific need that could not have been reasonably known at the time of the execution of the grant award may request a one-time increase in its award. For such specific, one-time needs, a grantee should request in writing and include:

- A summary of the work proposed;
- A justification for the supplemental funding, including the specific needs and circumstances that triggered the request and why this was not foreseeable;
- Verification of actual and projected use of all unobligated funds in the current grant award; and
- A detailed budget by cost category for the increased funding requested. If supplemental funding is approved, a revised NGA will be issued, and the grantee must provide the appropriate revised budget schedules, objectives, and plan of action.⁷

j. Timeline for Submitting Budget Change Requests

Requests for budget changes must be submitted to DACL at least 21 days before the desired effective date. Requests for budget changes after the 10th month of the grant year, or less than two months before the end of the grant period, whichever is earlier, will be considered only in emergencies. When a budget revision request is approved, DACL will issue an amended NGA.

D. Reporting Requirements

- i. DACL requires certain reports and information to ensure grantees are properly using grant funds and making progress in carrying out its project or program and meet federal and other data collection and reporting requirements.

1. Incident Reports

⁷ DACL has the sole discretion of determining whether or not to approve a request to increase the grant award based on factors including but not limited to available funds, total number of requests, program need, and agency priorities. The final decision is made by the Director and is not appealable.

⁶ *Id* § 11.2.

Grantees must *immediately* report to DACL any problems, delays, or adverse conditions that materially affect their ability to carry out the activities and/or achieve the performance goals of the grant. Significant reportable events include, but are not limited to, unusual incidents or accidents; significant personnel matters that may affect program operations such as positive drug tests, claims of harassment or other assault, and suspected or confirmed exposures of grantee staff or clients to COVID-19 or any other communicable disease or virus that is the basis of a public health emergency; facility issues/major site renovations; site closures; external events affecting program operations; fraud; and/or a significant drop in program attendance or revenue. Reports must include the incident's basic facts, persons involved, persons notified, a description of the action taken or proposed, and any assistance needed to resolve the situation.

Grantees must report significant events to DACL as soon as possible, but no later than the next business day upon learning of the reportable event, via the eRisk portal. The grantee should email a copy of the report submitted in eRisk as a PDF to the assigned grant monitor upon its submission into eRisk. Paper report submissions will not be accepted.

Incident Reports must be completed in their entirety. Specific actions taken by the grantee must be explained and followed through to the final action step that shows completion of the incident.

2. Comprehensive Universal Reporting Tool (CURT)

Grantees use the CURT to provide information on their progress on the grant. Grantees must provide information on current grant activities; monthly and YTD client or units of service counts for each grant objective; a summary of the grant finances showing monthly, and YTD DACL and grantee share expenses, with explanations of large variances; outreach activities; and any deviations from the approved personnel roster. The CURT form is attached in the appendix to this manual. The CURT is due 30 days following the end of each month. The grantee should also use the CURT as a management tool for assessing its progress and awareness of significant grant issues. Information in the CURT may be made available to the general public through FOIA.

3. Data Management

The Client Services Tracking and Reporting System (CSTAR) is used by DACL for data collection and analysis purposes. Grantees must promptly, not to exceed more than 5 business days after the program or service is provided unless otherwise stated in the service standard,⁸ and accurately (1) enter monthly service and customer data (including case notes, if applicable); and (2) regularly monitor referrals from I & R/A, with contact made at least within 5 days of the referral. Grant

⁸ For example, the service standard for case management requires entry within 48 hours.

monitors will compare CSTAR data with the grantee submissions for reimbursement. DACL will not reimburse the grantee for costs associated with programs and/or services that are not reflected in CSTAR.

Grantees must explain any decrease in units of service from the prior fiscal year or failure to meet the total number of units of service in the grant. Failure to meet the total units of service in the grant agreement may result in a reimbursement review. This may include, but is not limited to, a review of payments, unit production, services rendered, and related documentation. DACL cannot reimburse costs that are not associated with providing units. Detailed descriptions of each type of unit of service are contained in the Service Standards.

E. Records Retention and Access

- i. Grantees must maintain, have readily accessible, and provide immediate access to DACL or DACL designees upon request during normal business hours, to all grant-related records as described in this section. These include, but are not limited to, financial records⁹ and related documents that substantiate grant performance and costs, such as written or recorded material, regardless of media, including electronic transmissions, CDs, videos, tapes, and copies.
- ii. Grant documents include copies of all grant and subgrantee awards, applications, reports, and grant-related correspondence. Personnel and payroll records include time and attendance reports for all individuals paid under the grant, including records of volunteers whose services are included as part of the grantee share and consultants' time and effort reports.
- iii. Grantees must comply with DACL requests to make copies of records in a format of DACL's choosing (whether paper or electronic). This includes records that contain protected health or other sensitive information. Grantees must safeguard sensitive files appropriately before transmitting them to DACL by encrypting them with a password or arranging for in-person pickup by DACL personnel.¹⁰
- iv. For grants renewed on an annual or periodic basis, records shall be kept for a minimum of three years from the date of submission of the annual audited financial statement covering that grant period, except in certain instances.¹¹

⁹ Financial records must be kept in accordance with Generally Accepted Accounting Principles. See City-Wide Grants Manual and Sourcebook §7.2.

¹⁰ DACL may reimburse grantees for reproduction costs

¹¹ See 2 CFR § 200.333 (listing exceptions as Litigation, claims, and audits; when DACL is notified by HHS/ACL to extend the retention period; records for real property and equipment acquired with Federal funds (which must be retained for 3 years after final disposition; when records are transferred to or maintained by the Federal awarding agency or pass-through entity (in which case the 3-year retention requirement is not applicable to the non-Federal entity); records for program income transactions after the period of performance; and indirect cost rate proposals and cost allocations plans. Further information and guidance is provide in "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Health and Human Service Awards," 45 CFR Part 75, Subpart D – Post Federal Award Requirements, Record Retention and Access (§§ 75.361-75.365).

- v. Failure to provide timely and complete access to requested records may result in corrective action taken by DACL, including immediate suspension or termination of the grant.

F. Grant Closeout

- i. Grant closeout is initiated on the date that all grant work is completed but not later than the last day of the grant period.
- ii. Within 30 days after the grant project is concluded, the grantee must refund to DACL any balance of unobligated funds advanced or paid to the grantee.
- iii. Within 60 days, the grantee must meet all its unpaid grant obligations and submit to DACL final financial and performance reports.
- iv. DACL may approve a grantee's written request to extend the 60-day final reporting period for good cause shown. The final report must:
 - 1. Include a current accounting of any property or equipment bought with grant funds, identifying any item to which DACL retains title, a final accounting of all grant funds received, the total final grantee share of approved costs, a zero balance for unliquidated obligations, and indicating the exact amount of unobligated DACL funds; and
 - 2. Contain a summary of the project's success in meeting the grant objectives and performance metrics, final year-to-date client counts and units of service, a description of what steps were taken to transition clients to other programs or service providers (if no continuation of grant), and such other information as DACL may require.
- i. Unobligated District funds remaining at the end of the grant period, cannot be carried over into the next fiscal year. In some but not all circumstances, federal funds may be carried over.
- ii. A no-cost extension for federal funds extends the grant period without increasing the costs of the project and requires advance written approval from DACL. Unobligated funds are "carried over" into a no-cost extension grant period.
- iii. To request a no-cost extension to carry over unobligated federal funds, grantees must:
 - 1. Request a no-cost extension to DACL in writing at least 45 days before the expiration date of the grant;
 - 2. Explain the need for the extension; and
 - 3. Include an estimate of the unobligated funds remaining and a spending plan for the remaining funds. The plan of use for the carryover funds must be consistent with previously approved project objectives.

- iv. For federal discretionary grants, grantees must normally reconcile costs incurred under the award within 60 days of the end of the grant period. Grantees must submit all documentation required for reimbursement (e.g., units of service, source documentation, the M-1 financial report with supporting invoices and receipts, and/or any other required financial documents).
- v. If a no-cost extension is granted, the grantee has 60 days after the end of the extended period to liquidate its obligations; otherwise, the grantee has 60 days from the grant's expiration to submit invoices for expenses incurred during the approved grant period.
- vi. For all other DACL grants, grantees should liquidate all obligations incurred by submitting invoices and any required financial reports by the date specified by DACL.
- vii. Every year, DACL sends out a close-out memorandum outlining grantee obligations, including the date by which grantees must submit all documentation required for reimbursement. This date is governed by deadlines established by the Office of the Chief Financial Officer (OCFO) and DC Comptroller and is not subject to extensions.
- viii. DACL may require a financial and compliance audit of the grant after the grant closeout. If the final audit shows disallowed costs; improper allocations of contributions and/or refunds; and/or incorrect service data reporting upon which reimbursement was requested and granted, DACL may recover appropriate amounts from the grantee.

III. REQUIRED GRANTEE POLICIES

A. Grantee Code of Conduct

- i. Grantees are encouraged to develop their codes of conduct applicable to their respective organizations that are consistent with the DACL GPM and DACL policies for the SSN.

B. Personnel Policies

- i. DACL requires grantees to maintain a personnel policy and written position descriptions for all staff paid under the grant.
- ii. Grantees should have established procedures for recruiting and selecting new staff, a systematic process for determining staff salaries and benefits, a personnel recordkeeping system, a training and development plan or program, and annual written staff evaluations.
- iii. In selecting among equally qualified applicants to work on DACL grant-funded programs, DC residents and those persons 55 years and older must receive preference.

C. Procurement Standards

- i. All DACL grantees that receive federal funds from DACL shall be governed by District and federal standards for the procurement of supplies, equipment, construction, and other services.¹²
- ii. Grantees that do not receive federal grant funds during the fiscal year from DACL must have written procedures for the purchase of supplies, equipment, and other services that identify staff positions authorized to make and approve purchases, standards of conduct, and the dollar thresholds for which competition and internal approvals are required.

D. Property Management Standards

- i. A request to use grant funds to purchase equipment that costs more than \$500 and not originally approved as part of the budget submission must be made in writing, detailing the need for the purchase, cost, and impact that the equipment's use or nonuse will have on the program.
- ii. Unless otherwise specified by DACL¹³, title to equipment purchased with grant funds vests in the grantee upon acquisition.
- iii. A grantee must request advance written approval from DACL before selling or disposing of equipment purchased with DACL funds. DACL requires that the proceeds be used for the replacement of the equipment or other uses to further the purposes of the grant.
- iv. Grantees must use equipment that is purchased with grant funds for the project or program for which it was acquired for as long as needed. The grantee may share the use of the equipment for other federally or DACL-sponsored projects only with DACL approval.
- v. Grantees must maintain property/inventory records for all equipment purchased with grant funds. Records must include a description of the equipment, the manufacturer's serial number, model number, or other identification numbers; source of the purchase, date of purchase, cost, percentage of DACL grant funds used in the purchase, condition of equipment, and information on disposition if the equipment is disposed of or sold.
- vi. Grantees should conduct an inventory of equipment purchased with grant funds at least annually to reconcile property to the records. DACL requires an inventory of equipment purchased with DACL grant funds as part of a continuation grant application. A similar updated inventory is required as part of the audited financial statement.
- vii. Grantees must report any lost or stolen equipment purchased with DACL funds to

¹² See 2 CFR § 200.318 ("General procurement standards.")

¹³ For example, DACL retains title to equipment if grantee fails to contribute its required local share, if any, or if DACL finds that the grantee improperly used funds.

DACL describing their investigation into the loss and steps being taken to avert further loss. Depreciation or use charges on equipment acquired under a federally or District supported project are unallowable.

- viii. DACL grantees receiving federal funds must comply with federal requirements for real property, equipment, and intangible property costing \$5,000+ per unit with a useful life of more than one year.¹⁴

E. Written Financial Procedures

- i. Grantees must have written financial procedures governing their organization's financial processes.
- ii. The procedures supplied with the grantee's accounting software do not constitute sufficient written procedures for a grantee's internal processes.
- iii. At a minimum, written financial procedures must:
 - 1. Specify, by position and scope of authority, the employee(s) authorized to take any action obligating funds (committing the organization to spend money), signing checks, utilizing petty cash, reviewing and approving payroll, receiving, or depositing any revenue received by or on behalf of the organization, and taking part in the procurement, bookkeeping and reconciliation processes;
 - 2. Provide for a uniform process for making payments including the authorizing signatures, supporting documentation establishing the purpose and amount of the expenditure, and tie-in to the general ledger by budget line item;
 - 3. Establish rules for satisfying and separating the local cost-share, if any;
 - 4. Detail the organization's payroll and time and attendance process, including supervisory review and approval and recordkeeping; and
 - 5. Provide for separation of duties and internal checks and controls for all financial transactions.
 - 6. No single employee should have control of all financial operations, procedures, and records.
- iv. In general, written financial procedures should be proportionate to the size and complexity of the organization's operations and the support it receives.

IV. FINANCIAL REQUIREMENTS, STANDARDS, AND PAYMENTS

- i. All DACL grantees must have financial management systems that comply with District and federal requirements.

¹⁴ See 2 CFR 200.33

A. Segregation of Grant and Project Expenses

- i. A grantee's financial management system must account for the cost categories specified in the DACL budget including personnel, fringe benefits, supplies, equipment, travel, occupancy, communications, other direct costs (broken down by type), and indirect costs.
- ii. Grantees must adhere to Generally Accepted Accounting Principles (GAAP) regardless of the source of funds.
- iii. Grantees must separate grant costs by project and source of funds. Where more than one project is covered by a grant, each project must be accounted for separately. Some types of project expenses may be paid partly by DACL grant funds and partly by other sources. The grantee's financial management system must be able to distinguish both the sources and the amounts incurred from each source.

B. Program Income

- i. Grantees must account for program income that is directly generated by a grant-supported activity or earned only because of grant-funded activities during the grant period.
- ii. Unless otherwise restricted by federal regulations or the grant agreement, grantees may deduct grantee share costs incident to the generation of gross income to determine program income under a grant. Examples include, but are not limited to, fees for service, the sale of items made under an award, income from the use or rental of real or personal property acquired with grant funds, and voluntary contributions by program participants.
- iii. Program income generally does not include interest earned on grant funds, rebates, credits, or discounts.¹⁵
- iv. Grantee must use program income in one of the following ways:
 1. Add to the grant-funded project to further eligible program objectives (voluntary contributions for programs under Title III of the OAA **must** be used in this way);
 2. Deduct from the total program cost in determining the net allowable costs on which the DACL share, including federal dollars, is based; or
 3. Reduce DACL's local share of the project.

C. Voluntary Contributions

- i. All DACL-funded grant services must be available to participants free of charge, except for pre-approved cost-share programs.

¹⁵ 2 CFR § 200.80. If the rebate, credit, or discount is for an expense that has already been reimbursed to the grantee by DACL, the grantee must reconcile the rebate, credit, or discount, on the grant award (the total expense would be less than the amount that DACL reimbursed for, so grantee must pay back the amount of rebate, credit, or discount to DACL).

- ii. Grantees should encourage and accept voluntary contributions by:
 1. Informing participants, and other appropriate parties, such as family members and caregivers, of the cost of providing the service and letting them know that any voluntary contributions are used to help defray program costs and make additional services available to others;
 2. Offering them an opportunity to make a voluntary contribution; and
 3. Unambiguously stating that “No one will be denied the service if they are unable to make a donation.”
- iii. Statements that are designed to look like a bill, are intimidating, or fail to state that contributions are voluntary, are not allowed.
- iv. Voluntary contributions are considered program income. Grantees must account for all voluntary contributions and show how the contributions were spent. Voluntary contributions are different from costs for events charged by a third party, even if the grantee collects the money for a non-DACL-funded event, and thus are not covered under this section.

D. Payments and Financial Reports

- i. Failure to submit requested information required for reimbursement on time may include, but not limited to:
 - A delay in reimbursement;
 - Forfeiture of reimbursement for the period affected;
 - Suspension or termination of the grant award; and/or
 - The addition of conditions to the affected grant or future grant.
1. Reimbursement for Services Rendered and Reported
 - a. Grantees are required to collect and report the number of clients served and the number of services provided each month based on standard units of service.
 - b. Each NGA includes an agreement on the number of clients served and the number of services provided for the grant period.
 - c. Grantees must notify DACL immediately if they are not able to meet the terms and conditions of the grant agreement for any reason. DACL will not provide reimbursement or payment for services that are not provided or not reported.

2. Reimbursement Process

- a. Grantees must submit a monthly M-1 Financial Invoice in the DC Vendor Portal to the Programs Unit in DACL.
- b. The M-1 requires grantees to report total costs incurred by the cost categories in the NGA and the local share contributed that month.
- c. Grantees must include a Summary of Expenses and copies of all supporting documents for expenses claimed with the M-1 Invoice, including payroll documentation, invoices, vouchers and receipts, and documentation for the local share claimed.
- d. DACL cannot issue reimbursement or payment for costs without sufficient supporting documentation.
- e. The M-1 Invoice is due on the 20th of the month following the month for which reimbursement is claimed, except for reimbursement for the final month of the grant year where grantees will be notified of an earlier due date.
- f. The M-1 must include an original signature by an authorized official certifying their accuracy.

3. Source Documentation

- a. Grantees must maintain source documentation verifying actual services performed and the actual costs incurred. The source documentation must reflect the data grantee reports to DACL through M-1s and DACL's data management system.
- b. All supporting records of grant expenditures must be kept in sufficient detail to show the exact nature and cost of the expenditures for each account. Records must be maintained in a manner to permit the preparation of accurate, required financial reports and to validate that the project funds were appropriately spent.
- c. Grantees must maintain source documentation verifying the dates and amounts of services provided. Source documentation includes original records that establish that services were provided and include, but are not limited to, such items as employee timesheets, payroll records from a payroll service, client or volunteer attendance and sign-in records, calendars, minutes of meetings, consultant time, time and effort sheets, invoices, vouchers, bills, and receipts.
- d. Secondary or administrative records created by the organization, such as spreadsheets showing costs incurred, are not source documentation. While these secondary records may be helpful in organizing expenses, they are not acceptable as substitutes for the original invoices, receipts, and other expense documentation. Source documentation is required for reimbursement.

E. Overpayment, Unearned Payment, or Otherwise Erroneous Payment

- i. If DACL determines that an overpayment, unearned payment, or otherwise erroneous payment has been made to a grantee, DACL shall notify the grantee in writing and include the basis for its determination. In this notification, DACL may request a refund, an offset of the erroneous payment from current funds due to the grantee, or a reduction in the grantee's current DACL award.
- ii. Grantees must respond in writing within 21 days of receiving the notification from DACL. After considering the response, DACL may take such actions as authorized by law, including but not limited to, establishing a repayment schedule, offsetting the overpayment from a current grant award or payment due by DACL to the Grantee, or referral to the DC Attorney General for collection, or other legal action.

F. Accruals

- i. During the fiscal year closeout process, DACL allows grantees to accrue expenses. The accrual process allows grantees to submit expense estimates (e.g., payroll, utilities, etc.) and provide source documentation when grantees receive it.
- ii. Accruals are estimates that allow DACL and its grantees to conduct an orderly closeout of grants at the end of the grant period and meet financial Deadlines
- iii. Accruals are obligations for goods/services that will be received by grantees before the end of the fiscal year (September 30) but have not yet been paid. DACL must receive an official accrual letter from grantees by DACL's deadline, which will be stated in an annual closeout memorandum from DACL.
- iv. The accrual letter must include a written cost estimate through September 30. Calculations for the accrual should be based on previous activities and/or calculations certified by vendors. DACL will reimburse grantee's actual expenses when grantees submit sufficient source documentation by DACL's established deadline.
- v. When submitting the source documentation for actual expenses that have been accrued, grantees must label such expenses as **ACCRUED** for proper accounting.

G. Annual Audit

- i. DACL requires grantees to have an annual, independent financial audit of financial statements conducted. Organizations receiving \$750,000 or more in federal funds must conduct and submit to DACL a single audit.¹⁶
- ii. The audit must be performed by a certified public accountant licensed in the District of Columbia and must cover the grant year. Organizations that operate and conduct audits based on a different fiscal year from the DACL fiscal year ending September 30, must

¹⁶ 2 CFR § 200.500, available at <https://www.ecfr.gov/cgi-bin/text-idx?SID=7613a86dcf9c894cfb486ed90e0491ec&mc=true&node=sp2.1.200.f&rgn=div6> (last accessed 22 Jul 2020)

reconcile the audit to the DACL grant year.

- iii. The audit, including the reconciliation if required, is due on March 31, covering the grant year that just ended.
- iv. If a grantee fails to submit an approved audit on time, DACL may suspend its current grant until the report is submitted and approved.
- v. DACL generally requires a final financial and compliance audit when a grant is closed out. DACL reserves the right to have an audit conducted at any time on a current or past grant as part of its monitoring and fiduciary functions.

H. Final Disbursement Reporting

- i. DACL does not require a final disbursement report at the end of each grant year if the grantee has a continuing grant for that program with DACL. If a grant is closed out, the procedures discussed in the GPM apply.

V. ALLOWABLE COSTS

A. Cost Principles

1. DACL applies federal cost principles to determine whether costs are reimbursable and to what extent charged to a DACL grant, regardless of the source of funds for the grant (i.e., federal cost principles apply even if the DACL grant is funded entirely with District funds).¹⁷
2. The cost principles apply to all costs charged to all DACL grants. Grantees are responsible for understanding and applying cost principles.
3. Grantees are responsible for understanding and applying cost principles.
4. Key principles include, but are not limited to:
 - a. DACL's maximum obligation to support the program will not exceed the amount in the NGA.
 - b. The cost of an item claimed must be reasonable.
 - c. The cost of an item claimed must be allocable to the grant and to one or more specific objectives under a grant.
 - d. The cost must contribute to the purposes and execution of the grant project.
 - e. Indirect costs are often allocable to several programs, and the grantee must detail the amount allocable to the specific grant (and how the amount was determined) in the budget narrative.
 - f. The cost of an item claimed must be consistent with any specific limitations and

¹⁷ 2 CFR 200 Subparts A-F

exclusions in the grant award.

- g. Grantees must treat all cost items consistently within the grant and non-grant activities.
 - h. Each cost item must be adequately documented.
 - i. An expense claimed as part of the federal share of the grant may not be included as a cost or used to meet a cost-sharing requirement of any other federally financed program in any prior, current, or future period.
5. Grantees must adhere to the DACL approved budget for the grant. These principles are to be used to construct proposed budgets and any proposed changes to the budget during the grant period.

B. Allowable Costs

- i. For evaluating particular cost items, grantees should refer directly to the detailed explanations in the OMB Circulars and, if questions remain, confer with the Grant Monitor and/or Program Manager, before incurring any costs.¹⁸ DACL is not responsible for reimbursing expenses that do not follow the federal cost principles.

1. Personnel Costs

Salaries and wages for employees working on a DACL grant project during the grant period are allowable if:

- a. The total compensation is reasonable for the work performed, and it conforms to the amount submitted in the approved budget, and conforms to the established policy of the organization applied consistently to government and non-government activities; and
- b. The charges are properly documented. This documentation requirement applies to direct salary charges, as well as salaries allocated to indirect costs, and to both the DACL share and grantee's local share.
- c. Grantees must have personnel policies and procedures in place that establish the documentation process and require approval by a responsible official of the time employees work on the grant. These time and attendance documents may be manual or electronic but must be signed by the employee and authorized supervisory official.
- d. An employee whose personnel costs are charged to the grant must record an after-the-fact determination of actual time spent on grant activities.

¹⁸ Certain costs are unallowable and may not be charged to grants. Grantee assumes full responsibility for following federal cost principles. Unallowable costs include, but are not limited to, (a) alcoholic beverages; (b) bad debts; (c) donations and contributions (In-kind expenses) (These may be used to meet the grantee's local share requirement, but are not reimbursable under the grant from DACL funds.); (d) entertainment; (e) fines and penalties; (f) fundraising and investment management; (g) goods and services for personal use, such as subscriptions and memberships; (h) honoraria; (i) lobbying; and (j) losses on another grant or contract. See 2 CFR §§ 200.420-475 for selected examples of allowable and unallowable costs.

For employees working exclusively on one project, this requirement may be fulfilled by documentation of that dedication to the project and source of funding and completion of the agency's standard time and attendance records.

- e. If an employee works on more than one project, the time and attendance records must reflect the actual time spent on each project. Routinely recording a fixed percentage of time worked on the grant (i.e., merely repeating the percentage estimated in the grantee's budget) is not acceptable documentation of actual time worked on the grant project.
 - f. Similarly, employees whose time is allocated in part for indirect costs must allocate the actual hours spent on those functions. Employees whose salaries and wages are used to meet cost-sharing requirements must have time and attendance records to support the cost-share for the grant in the same manner as those whose salaries are a direct cost under the grant.
 - g. A sample acceptable timesheet which provides space for separating time worked on each project, as well as time spent on management functions attributable to indirect costs.
 - h. Contractors and consultants are not employees and thus are not paid salaries or wages, even though they may be paid an hourly rate, and should submit time and effort records under their contractual agreements with the grantee. Their costs should not be included in the B-4 Personnel Schedules in the grant application.
 - i. Fringe benefits computed under a formally established and consistently applied organizational policy are allowed as a direct cost if they are included in the grantee's budget schedules and narrative.
2. Certain Costs for Meetings and Conferences
- a. If required as part of the approved grant project are allowable. DACL discourages the use of facilities that charge a fee and does not reimburse for rented space outside the District of Columbia.
 - b. Meals costs for employees attending a meeting is an unallowable personal expense. Unless expressly approved in advance, DACL does not reimburse for meetings and conferences attended outside the Capital Beltway.
 - c. Equipment whose cost is \$500+ is not allowable unless DACL has approved the item and expense in advance. Equipment paid with DACL grant funds may not be included subsequently in depreciation costs charged to a DACL grant.
3. Travel Costs
- a. Travel costs are allowable for travel inside the Beltway only.

Limited exceptions must be approved by DACL in writing (e.g., for grant staff training and conference events).

- b. Travel is reimbursed at the federal mileage rate. For grantees paid on a per-unit basis, travel will not be reimbursed separately.

4. Consultant Services

- a. Grantees normally are expected to use the services of their employees to carry out the activities supported by DACL grants. However, where necessary to contract out the work for the services of an individual who is not an employee, the grantee must do so following its organizational contracting procedures and the factors specified in the federal cost principles.¹⁹
- b. The grantee's budget and/or request for approval of a consultant contract must specify the rates for service and other consultant costs broken down by category. Contractor and consultant costs are part of "other direct" expenses in the DACL grant application budget schedule (B-3 column 6); their costs should not be included in the B-4 Personnel schedules.

5. Audit Costs

- a. Audit costs are allowable as part of the grantee's indirect costs only if the costs are identified in the budget.

6. Indirect Costs

- a. The indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective.
- b. **Grantees must include an indirect cost allocation plan in the budget narrative with an explanation of the methodologies used to calculate indirect costs.** Although there are different methodologies available for allocating indirect costs, the methodology used must result in an equitable distribution of costs to programs.
- c. Indirect cost must meet the DACL cost principles (outlined in Section V. A. above) and they must be consistently charged as either indirect or direct costs. **Indirect costs may not be double charged or inconsistently charged as indirect and direct charges.**
- d. Because of the diverse characteristics of organizations and their accounting practices, it is not possible to specify the types of cost which may be classified as indirect costs in all situations. Typical examples of indirect costs for many organizations may include the

¹⁹ See 2 CFR § 200.459 ("Professional service costs").

costs of operating and maintaining facilities, and general administration and general expenses, such as the salaries of executive officers, personnel administration, and accounting. However, expenses must be consistently charged as charged as direct in one grant and charges as indirect in other grants.

- e. DACL's standard indirect cost rate is up to 12% of total personnel costs in the grant. If a grantee has a negotiated federal indirect cost rate, the grantee should supply a copy of the negotiated rate to DACL. **Indirect costs must be budgeted (in the budget narrative), and grantees must provide sufficient M-1 source documentation (outlined in Section E.3 above) to be reimbursed for indirect costs.**

Please note: DACL does not allow depreciation in any grants.

VI. HANDLING OF INFORMATION

A. Reports and Publications

- i. Where authorized in the grant budget, costs relating to the preparation, publication, and dissemination of reports or publications about DACL-funded activities and services may be allowable.
- ii. DACL may request to review and approve any reports or publications, or parts thereof, based on DACL-funded activities and services before publication.

B. Inclusion of DACL Logo

- i. Grantees must include the official DACL logo and the following statement of support on all websites of DACL-funded activities and services, stationery, publicity materials, and written media communications, including newsletters, flyers, brochures, and other printed materials: **Supported by the D.C. Department of Aging and Community Living.**
- ii. The logo and support statement also must be printed in a conspicuous place on all equipment, including vehicles, acquired or operated with DACL funding. Grantees must abide by DACL style guidelines when using the official logo.
- iii. DACL may require that certain promotional templates provided by DACL be used when promoting specific programs. In those instances, templates and instructions will be provided to grantees.
- iv. Grantees must provide copies of all marketing materials, brochures, flyers, and other collateral items to DACL via email at dacl.communications@dc.gov for DACL awareness.

C. Acknowledgment of DACL Support

- i. Grantees must acknowledge DACL support in every publication of any material based on or developed under a DACL grant. For example:

- ii. This publication was prepared by [*Grantee Organization*] with the support of a grant from the D.C. Department of Aging and Community Living.
- iii. Where federal agency support is also provided, that agency usually should be included in the acknowledgment, as well as a disclaimer as to the content of the information. Grantees should confer with DACL staff on the specific wording of any acknowledgment.
- iv. In addition to the formal acknowledgement of DACL support and use of the DACL logo, grantees must acknowledge their partnership with DACL when writing about and discussing services and activities for which they receive DACL funds, even if DACL funds only part of the services and/or activities, including newspaper articles, press releases, newsletters, fundraising materials, and orientation materials for staff, clients, and family members. This includes acknowledging DACL support in media interviews and stories when discussing any activities and services funded by DACL grants.

D. Freedom of Information Act (FOIA)

- i. DACL is subject to the DC Freedom of Information Act (FOIA).²⁰ Unless a valid exemption to FOIA applies, the information provided to DACL by grantees is subject to public disclosure.
- ii. Emails from grantees sent to DACL staff are considered public records, and unless a valid exemption in the law justifies their withholding or redaction, emails to and from DACL and grantees are subject to public disclosure.

E. Religious or Faith Preferences

- i. DACL-funded services must be open to all eligible District of Columbia seniors, people with disabilities, and caregivers. Communications by grantees to stakeholders, including verbal statements, newsletters, flyers, and other materials branded with DACL's logo, must not express or imply a preference toward any particular religion, faith, or creed.
- ii. Grantees may not expend grant funds on any religious events, including flyers or other promotional materials in connection with the event, providing refreshments, or using DACL grant-funded staff at such events unless the grantee is paying the staff member for his/her time using nonfederal, non-DACL funds.
- iii. Grantees may include announcements of times and dates of events such as prayer services or bible study groups. Grantees may not include specific prayers, religious messages/text, and/or viewpoints in DACL-funded communication, whether verbally by a grant-funded staff or within a DACL-funded publication. If a grantee conducts religious activities, they must be offered at a separate time or location from programs funded with financial assistance, and participation in religious activities must be voluntary.

F. Media Contacts

- i. Grantees must notify DACL of media contacts or potential contacts, in advance if

²⁰ DC Code §§ 2-531-539 *et seq.*

possible, and no later than the same business day of the contact at dacl.communications@dc.gov. DACL may refer reporters to grantees to comment on specific matters about DACL- funded programs. If Grantees are contacted directly by reporters to comment on DACL-funded programs, they must notify DACL staff of the questions asked, and the responses provided immediately after the interview concludes. Grantees must also provide the anticipated date of publication or broadcast, the reporter's name, and organization.

G. Protection of Privacy and HIPAA

- i. Grantees with access to DACL's data management system have access to Protected Health Information (PHI) and ePHI, as those terms are defined by the Health Insurance Portability and Accountability Act (HIPAA), and must develop systems containing controls and safeguards in compliance with the HIPAA Security Rule.
- ii. Systems should:
 - a. Ensure the confidentiality, integrity, and availability of electronic protected health information; and
 - b. Detect and prevent reasonably anticipated errors and threats due to malicious or criminal actions, system failure, natural disasters, and workforce (user) error.
- iii. HIPAA's privacy rule requires appropriate safeguards to protect the privacy of personal health information, sets limits and conditions on the uses and disclosures that may be made of such information without patient authorization, and gives patients' rights over their health information, including rights to examine and obtain a copy of their health records and to request corrections.²¹
- iv. Grantees that email information or spreadsheets containing ePHI must send that information in a password-protected file and should follow up in a separate email or telephone call with the password. PHI or ePHI must not be included in the subject line or body of an email.
- v. Additionally, grantees must ensure that physical copies of PHI are not left in unsecured locations such as on office printers or desks in unsecured areas; that records with PHI be stored in locked file cabinets; and that any computers or files (including flash drives and other media) containing PHI be secured with a password.

H. Copyright

- i. A grantee may copyright any work that was developed under a DACL grant. However, DACL, and the federal government where federal funds are used, retains a royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use the work for DACL purposes and to authorize others to do so.
- ii. DACL, and the federal government where federal funds are used, has the right to obtain, reproduce, publish, or otherwise use data first produced under a grant award

²¹ See also 45 CFR Parts 160 and 164, Subparts A and C.

and to authorize others to do so.

VII. Deficiency, Suspension, Discontinuation, and Termination

- i. DACL may issue a notice of deficiency that can lead to suspension, discontinuation, or termination of the grant, in whole or in part if, in DACL's sole discretion, a grantee has failed to comply with grantee agreement. This may include, but is not limited to when:
 1. The services performed by the grantee under the grant are of unacceptable quality, frequency, amount, and/or duration, or are otherwise not meeting the needs of the grant's intended participants;
 2. There are multiple, substantiated complaints regarding the grantee's administration of the grant;
 3. There is substantial evidence that the grantee and/or its agents have engaged in criminal or ethical violations, whether related to the grant or not;
 4. The grantee has repeatedly failed to abide by DACL guidance or instructions relating to the grant;
 5. The grantee has repeatedly failed to meet deadlines established by DACL; and/or
 6. The grantee demonstrates a current or future inability to perform under the grant, including but not limited to failure to secure adequate, appropriate space to conduct grant activities; fiscal problems; or persistent problems with staffing related to the grant.
- ii. A notice of deficiency provides the grantee notice and an opportunity to resolve the failure and informs the grantee of the proposed action to suspend or terminate the grant if the failure is not remedied.
- iii. DACL reserves the right to immediately suspend, discontinue, or terminate a grant without notice if DACL determines that there is an imminent threat of harm to the District, the grantee's service recipients, or the public by allowing the grantee to continue to administer the grant.
- iv. The grantee may not incur new obligations on the affected grant after the effective date and time of the suspension, or termination of the grant. The final decision to suspend, discontinue or terminate a grant is made by the Director of DACL and is not subject to appeal.
- v. A warning may be issued in some circumstances before a deficiency at the sole discretion of DACL.

A. Notice of Deficiency

- i. If DACL determines that the grantee has failed to comply with one or more terms and

conditions of the grant, it will notify the grantee in writing of the deficiency and include a notice that failure to correct the deficiency may result in suspension, discontinuation, or termination of the grant.

- ii. The grantee must respond to the notice within 14 calendar days from the date of the letter, describing what action it has taken or plans to take to correct the deficiency. If the grantee fails to respond adequately within 14 days, DACL may proceed with the suspension, discontinuation, or termination, and the suspension or termination will be in effect as of the date set in the original notice.

B. Suspension

- i. After considering the grantee's response, DACL may delay further action, accept the proposed plan of correction, require a modified plan of correction, or proceed with the proposed suspension, discontinuation, or termination. If DACL proceeds with the suspension, discontinuation, or termination after considering the grantee's response, it will send a new notice to the grantee setting forth the terms of the suspension, discontinuation, or termination and its effective date.
- ii. If DACL suspends a grant, DACL will provide notice to the affected grantee in writing, indicating: the reason for the suspension; the length of the suspension; and any corrective action(s) the grantee must take to remedy the issue.
- iii. DACL's suspension of a grant immediately stops DACL's grant funding for the project, regardless of how much money is left in the grant award or time in the grant period. DACL will set the duration of the suspension based on the nature and severity of the deficiency and the projected time needed for the grantee to come into compliance. During the suspension, the grantee may not incur new obligations in connection with the grant or the portion of the grant suspended without DACL's written authorization. If the grantee completes the corrective action to DACL's satisfaction, DACL will notify the grantee in writing that the suspension is lifted.
- iv. DACL may extend the suspension or terminate the grant if the grantee fails to complete the corrective action(s) outlined in the notice of suspension letter. If extending the suspension or terminating the grant, DACL will issue a notice of extending the suspension or termination, setting forth the terms of the action and its effective date.

C. Discontinuation

- i. A discontinuation is when DACL decides to end the grant at the end of the grant period, without exercising the right to extend the grant for an option year. If DACL discontinues a grant, the grantee is ineligible to apply for a continuation grant or competitive grant for that program immediately following the end of its current grant.
- ii. Discontinuation may or may not be related to a proposed suspension or termination. After a grant is discontinued, the close-out procedures in the GPM apply.

D. Termination

- i. If the grantee fails to remedy the deficiency identified by DACL that results in a

suspension, DACL may choose to terminate the grant.

- ii. DACL may also make an emergency determination of termination without advance notice to protect the interests of the District government. DACL will notify the grantee in writing of the action, without providing the notice and opportunity to respond described above.
- iii. Circumstances that may trigger an emergency determination to terminate a grant without notice and opportunity to respond include but are not limited to when: (a) DACL determines that a serious risk of substantial injury to or loss of project funds or property exists; (b) violation of a federal, state, or local criminal statute exists; or (c) the nature and severity of the deficiency require immediate action to protect the beneficiaries of the grant, or the government's interests.
- iv. Whenever DACL unilaterally decides to terminate a grant, it will provide a written notice to the affected grantee setting forth the termination's terms and effective date.

E. Termination by Mutual Agreement

- i. When both DACL and the grantee agree to end all or part of the grant for any reason, the grant may be terminated by mutual agreement.
- ii. If the grantee wishes to terminate the grant, the grantee should notify DACL in writing at least 60 days in advance of the proposed termination to allow DACL to make appropriate arrangements to continue services and/or activities without interruption.
- iii. Minimally, the notice should state the grantee's proposal for continuity of services; smooth transition with any substitute grantees; and process and timeframe for notifying clients and grantee staff. Alternatively, DACL may choose to send a notice to the grantee setting forth the terms and effective date of the mutual termination.

F. Close Out of Terminated Grants

- i. The procedures for Grant Close-out in the GPM apply to all grants, including terminated grants.
- ii. The date of completion for a terminated grant is the date of the effective termination. DACL may require additional reports or actions in connection with a termination.

1. Policy Appendices

POLICY MEMORANDUM 18-P01

TO: Senior Service Network Providers
FROM: Laura Newland, Director
DATE: November 5, 2018
EFFECTIVE: Immediately
SUBJECT: Data Security Policy

I. PURPOSE

This policy establishes certain data security guidelines that are required when communicating via email about people whom the DACL serves.

II. SCOPE

This policy applies to all grantees within the Senior Service Network.

III. AUTHORITY

D.C. OFFICIAL CODE § 7-504.10 *et seq.*

IV. DEFINITIONS

Client: A District resident aged 60 or older, or aged 18-59 with a disability, who has either received or has indicated an interest in receiving services funded or provided by DCOA.

Files: Documents attached to emails in Microsoft Word, Microsoft Excel, Adobe PDF, WordPerfect, or other formats.

Senior Service Network Provider: An entity that receives funding from DCOA to provide services to Clients.

Sensitive Client Information: Information about a Client containing datapoints including, but not limited to, the Client's home address, email address, telephone number, social security number, health conditions, diagnoses, prescriptions, individualized plans for employment, medical record numbers, health insurance beneficiary numbers, photographs, and biometric identifiers such as fingerprints.

V. POLICY

It is the policy of DACL to ensure that any Sensitive Client Information sent via email is transmitted securely and discretely and is not subject to unauthorized disclosure or viewing by unintended recipients.

VI. REQUIREMENTS & PROCEDURES

1. Sensitive Client Information must never be communicated in the body or subject line of an email.
 2. Files containing Sensitive Client Information must be encrypted with a password lock before being sent.
 3. Recipients of encrypted Files must be called by phone with the password, which must not be sent over email.
 4. When an email is regarding a Client, the Client's initials must be used in the subject line instead of his or her full name.
 5. Senior Service Network Providers must ensure that their staff are appropriately trained on and abide by this Policy Memorandum.
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GOVERNMENT OF THE DISTRICT OF COLUMBIA
[DACL]
POLICY MEMORANDUM
04-P07

SUBJECT: Voluntary Contribution Policy for [DACL]-funded Services
February 18, 2004
Upon Receipt

This Policy Memorandum clarifies the language in the [DACL] Service Standards that requires grant recipients to: (1) inform participants, family members, and/or caregivers of the cost of providing the service; and (2) offer them an opportunity to make a voluntary contribution to help defray the cost, thereby making additional service available to others.

The following statement will be provided to participants, family members and/or caregivers:

The cost of this service (name the service) is approximately \$_____. We welcome a suggested donation of \$_____. Donations will be used to serve more people. No one will be denied the service if they are unable to donate.

The amount included as a suggested donation must be reasonable and generally reflect the income of the persons being served. References to contributions in any client documents prepared by the grant recipient, including monthly contribution reminders, must include this statement.

A more thorough contribution policy that reflects the service standards must be kept on file and produced upon request.

Grant recipients who receive funds for congregate, homebound and weekend nutrition programs have the additional requirement of posting the contribution statement as required in the Voluntary Contribution Policy for Nutrition Programs (Policy Memorandum 01-P04 dated January 16, 2001).

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF AGING AND COMMUNITY LIVING

POLICY MEMORANDUM

TO: Senior Service Network
FROM: Laura Newland, Director
DATE: October 1, 2019
SUBJECT: Inclement Weather-Emergency and Discretionary Closure Policy

This policy outlines the requirements for Senior Service Network (SSN) organizations when either full or partial day closures of programs or a suspension of service occur due to inclement weather, natural disasters, or other incidents causing disruption to operations. It also outlines requirements to suspend services for discretionary or optional purposes. SSN organizations may request partial or full closure of social services programs and/or administrative services offices for discretionary, optional, or non-emergency purposes. The closure of programs and/or administrative services for discretionary, optional, or non-emergency purposes requires the approval of DACL. All requests for closure should be forwarded electronically to your grant monitor with two (2) weeks advanced notice and a carbon copy of the request forwarded to the Director and the Chief of Staff. The request should identify the program(s) and/or service(s) that are proposed to be closed, the duration of the proposed closure, and the reason for the request to close programs and/or services.

Services to seniors, persons with disabilities, and their caregivers provided by SSN organizations are crucial, and in many cases, life-sustaining. Care should be taken when deciding to close sites. Seniors, persons with disabilities, and their caregivers should be instructed to determine SSN organizations' closing information by contacting its main telephone number. Prior to closing or an early departure, organizations must leave a recorded message advising callers of its operating status and a contact telephone number for emergency referrals. The recorded message must be updated if and when the operating status changes.

Social Services

All SSN organizations' social services programs must follow the D.C. Public Schools' (DCPS) guidelines concerning late arrivals, dismissals and closures in the event of inclement weather, natural disasters, or other incidents causing disruptions to operations. If a meal site host determines its facility must be closed when DCPS are open, the Lead Agency must contact the food contractor to cancel meals before 7:00 a.m. on the day of closure.

Administrative Services

All SSN organizations' administrative offices must adhere to the D.C. Government's guidelines concerning late arrivals, dismissals and closures of offices in the event of inclement weather, natural disasters, or other incidents causing disruptions to operations. Closing of sites when D.C. Government is open requires both DACL approval and notification of your grant monitor.

Discretionary or Optional Closures

Senior Service Network organizations may request partial or full closure of social services programs and/or administrative services offices for discretionary, optional, or non-emergency purposes. The closure of programs and/or administrative services for discretionary, optional, or non-emergency purposes requires the approval of DACL.

All requests for closure should be forwarded electronically to your grant monitor with two (2) weeks advanced notice (or in emergencies, as soon as possible) and a carbon copy of the request forwarded to the Director and the Chief of Staff. The request should identify the program(s) and/or service(s) that is proposed to be closed, the duration of the proposed closure, and the reason for the request to close programs and/or services.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF AGING AND COMMUNITY LIVING

POLICY MEMORANDUM 19-P01

TO: Senior Service Network
FROM: Laura Newland, Director
DATE: October 1, 2019
SUBJECT: Investigating Sexual Harassment

This memorandum serves as a reminder that all DACL grantees, vendors, and contractors are covered by the Mayor's Order on Sexual Harassment, which is available online at https://mayor.dc.gov/sites/default/files/dc/sites/mayormb/page_content/attachments/Mayors-Order-2017-313.pdf. It also extends to the Senior Service Network the requirement to investigate any instances of potential sexual harassment. Any observed or reported sexual harassment that occurs during a DACL-sponsored program or activity must be investigated as soon as possible. An investigation report must be prepared, signed, and sent to your organization's assigned grant monitor within 30 (thirty) days of the alleged conduct. The report must include interviews with the alleged perpetrator(s), alleged victim(s), and any witnesses, as well as findings, conclusions, and proposed corrective actions. Please review the Mayor's Order carefully, and contact your assigned grant monitor with any questions. Note that the obligation to investigate does not replace the requirement to file an incident report as soon as possible after the incident is alleged to have occurred.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF AGING AND COMMUNITY LIVING

POLICY MEMORANDUM 19-P02

TO: Senior Service Network
FROM: Laura Newland, Director
DATE: August 1, 2019
EFFECTIVE DATE: Immediately
SUBJECT: eRisk Incident Reporting

DACL is pleased to announce that, effective immediately, incident reporting has moved online. Instead of completing paper reports, incident reports should now be filed on the web at <http://erisk.dc.gov>. Filing incident reports online should result in significant time savings, and will also allow incidents to be tracked and reported on in real-time. Until August 31, 2019, after filing a report using eRisk, please save and email a copy of

the report to your assigned grant monitor. By that date, DACL should be receiving incident reports automatically from the eRisk system and emailing the reports should no longer be necessary (but we will contact you if that changes).

POLICY MEMORANDUM 20-P01

TO: Senior Service Network
FROM: Laura Newland, DACL Director
DATE: October 1, 2019 (updated July 24, 2020)
SUBJECT: Advance Payment Policy

I. PURPOSE

This policy sets guidelines and procedures for DC Department of Aging and Community Living (DACL)-funded Grantees to submit Advance Payment requests for grant-approved services and the conditions for approval by DACL. This policy ensures that Grantees have the necessary capacity to operate DACL-funded programs and ensures DACL maintains a comprehensive and coordinated system of health, education and social services for the District's older adults (60 years and older), people with disabilities (18 to 59 years old), and their caregivers.

II. POLICY

All DACL-funded grantees may request, subject to the procedures below, an Advance Payment of their executed grant award amount up to 25 percent of the Notice of Grant Agreement (NGA) total amount for the fiscal year.

III. SCOPE

This policy applies to all DACL-funded grantees.

IV. AUTHORITY

D.C. Official Code § 7-503.01 et seq. and the DACL Grants Policy Manual.

V. DEFINITIONS

Advance Payment: a payment made to a Grantee upon request before expenditures are incurred. The amount of the payment shall not exceed 25% of the total Grant Award Amount as stipulated in the NGA. A Grantee Advance Payment, if authorized, is a portion of the Grant Award Amount stipulated in the NGA, and is not an increase in the Grant Award Amount. Increases in Grant Award Amounts must be requested to DACL separately in writing.

All expenses claimed on an Advance Payment will be subject to verification, validation, and reconciliation. Expenses under an Advance Payment may be disallowed if not in accordance with allowable costs under the Grants Policy Manual or the Office of Management and Budget (OMB) cost principles.

Grant Award Amount: the total grant award amount indicated in the signed Notice of Grant Award, including any increases approved by DACL.

Grantee: An entity that has been awarded a grant by DACL; has executed a signed Notice

of Grant Award (NGA) for the current fiscal year; and has accepted the terms and conditions of operating the grant(s) per its NGA and the Grants Policy Manual. For the purposes of this policy, this definition (and this policy) specifically excludes DACL contractors, who are subject to the processes and procedures of the Office of Contracting and Procurement.

I. CRITERIA AND PROCEDURE FOR AN ADVANCE PAYMENT

Criteria for Requesting Advance Payment:

- Grantee may only request one Advance Payment per NGA in a fiscal year.
- Grantee is in good standing with all DACL grant policies and is not in a suspension or probation period.
- Grantee is able to state the general reason for needing the Advance Payment.

Procedure for Submitting an Advance Payment Request:

1. Submit a letter to DACL on Grantee's official letterhead requesting the specific amount, which must include:
 - a. Amount (shall not exceed 25% of the total grant amount as stipulated in the NGA).
 - b. Reason (general information why the Advance Payment is needed).
 - c. Statement agreeing to abide by this policy and requirements established in this policy.
 - d. Statement waiving any claims for lost profits and all other damages and expenses resulting from an Advance Payment recall under this policy per Section VIII in this memo.
2. Submit an operating budget for the grant period covered by the NGA.
3. The request must be signed by the organization's authorizing official (Chief Executive Officer, Director, Executive Director or equivalent).
4. Upon approval by DACL, Grantee will then have the authorization to submit the letter reflecting the requested amount and the signed NGA in the E-Invoicing Vendor Portal.
5. After validation and review, DACL will confirm funding availability. DACL will then submit a formal request to the Office of Finance and Resource Management (OFRM) to certify the specific amount to be advanced to Grantee. OFRM will generate a voucher, the District of Columbia Treasury will generate payment, and Grantee will be paid in the same manner as traditional reimbursement under the NGA for DACL-granted services.

II. COMPLIANCE REQUIREMENTS

Certification and Reconciliation of Expenditures

Grantees shall comply with all Federal and District of Columbia laws pertaining to supporting documentation for all expenditures incurred with the Advance Payment. All Advance Payments must be reconciled by the end of Quarter Four in a given fiscal year. For this reason, Advance Payment invoice reconciliation will begin in Quarter Four during the month of July and end in September in

accordance with the year-end closeout procedures established by the Office of the Chief Financial Officer (OCFO). Please note that DACL reserves the right to have a grantee reconcile before Quarter 4, if DACL believes that the grantee may not be able to reconcile fully by September 30 (end of the fiscal year). Reasons for earlier reconciliation may include: available balance, spending trends, and year-end expenditure projections against a total approved budget.

M-1 Advance Payment invoice submissions will be completed for the period of the expenditures and submitted through the E-Invoicing Vendor Portal. DACL grant monitors will review and ensure compliance of the expenditures per allowable costs under the grant agreement.

Backup Documentation

Grantee must ensure that all M-1 information submitted via the E-Invoicing Vendor Portal is accurate, verifiable, and include documentation relevant to validating the amounts being claimed for reimbursement. The required documentation includes:

1. A copy of the CSTARS report summary;
2. Invoicing records that provide evidence that specific activities under a grant occurred or were performed;
3. Reported expenditures for each month via M-1; and,
4. Year to date expenditure totals and remaining grant budget amounts.

III. FAILURE TO PERFORM AND RECALL OF ADVANCE PAYMENT

In instances of nonperformance or deficiency in program operations leading to unsatisfactory delivery of services, DACL reserves the right to recall any Advance Payment and demand a refund of funds advanced if Grantee:

1. Is not making satisfactory progress in delivering services as stipulated in the grant award agreement;
2. Is not operating within the parameters of the NGA terms and conditions, Grant Policy Manual, and any other relevant governing documents(s); or,
3. Is not abiding by the requirements set forth in this policy.

IV. INQUIRIES

For questions regarding DACL's Advance Payment requirements, please contact the grant monitor assigned to the grant.

POLICY MEMORANDUM 20-02

TO: DACL Staff and the DACL Senior Service Network
FROM: Laura Newland, Director
DATE: June 5, 2020
EFFECTIVE: Immediately
SUBJECT: Mandatory Reporting of Elder Abuse

I. PURPOSE

This policy supersedes DACL Policy 16P-04, "Mandatory Reporting of Suspected Incidents of Older Persons and Persons with Disabilities."

II. SCOPE

This policy applies to DACL Staff and to the entire Senior Service Network (SSN).

III. AUTHORITY

D.C. Code § 7-1901 *et seq.*

IV. POLICY

A. Reporting Requirements for DACL staff and for the Senior Service Network

SSN and DACL Staff shall immediately report incidents of suspected elder abuse directly to Adult Protective Services (APS). The following actions are required:

- (1) SSN and DACL staff members shall discuss suspected or known incidents of abuse and neglect with their supervisor and report them to the APS Hotline: (202) 541- 3950. The report must be made as soon as SSN or DACL staff members are aware of the situation.
- (2) Both mandatory reporters as well as SSN and DACL staff not designated as such by the DC Code must report suspected abuse and neglect to the APS Hotline.

B. Training Requirements

- (1) Once developed by DACL, both DACL and SSN staff must take an annual training session on the requirements of this policy and D.C. mandatory reporting requirements regarding suspected incidents of abuse and neglect.
- (2) SSN and DACL staff must participate in additional periodic training sessions as established by DACL.

C. Mandatory Compliance; False Reporting

Mandatory reporters who fail to report suspected incidents of abuse, neglect, self-neglect, or exploitation of adults are subject to fines or penalties and to any sanction available to the governmental board, commission, or other authority responsible for their licensure, along with potential sanctions from DACL. A mandatory reporter who reports an alleged case of abuse, neglect, self-neglect, or exploitation is immune from civil or criminal liability if s/he acted in good faith. Fines, criminal penalties, and license suspension or revocation may be imposed for knowingly reporting false information.

SSN and DACL managers shall (along with immediately reporting the



incident to DACL) consider progressive discipline for any non-mandatory reporters who violate this policy.

D. Reporting Requirements

D.C. Code § 7-1903, “Reporting Requirements,” requires certain persons to immediately report suspected incidents of the abuse, neglect, self-neglect, or exploitation of adults 18 years of age and older to APS. Persons who are required under the law to report this information are referred to as “mandatory reporters” and include, but are not limited to, licensed health professionals, social workers, police officers, court-appointed guardians, bank managers, and financial managers. Through this policy, DACL is extending the D.C. Code’s reporting requirements to all DACL and SSN staff who suspect elder abuse or self-neglect, regardless of whether they are mandatory reporters under District law.

SSN and DACL staff must report, if known, the name, age, physical description, and location of the adult alleged to be in need of protective services; the name and location of the person(s) allegedly responsible for the abuse, neglect, or exploitation; the nature and extent of the abuse, neglect, self-neglect, or exploitation; the basis of the reporter's knowledge; and any other information the reporter believes might be helpful to an investigation.

E. Definitions of Abuse, Neglect, Self-Neglect, and Exploitation of Adults

The definitions of abuse, neglect, self-neglect, and exploitation that apply for purposes of this policy are those that are listed in D.C. Code § 7-1901.

POLICY MEMORANDUM

TO: DACL Staff and Grantees
FROM: Laura Newland, Director
DATE: September 27, 2021
EFFECTIVE: Immediately
SUBJECT: Language Access Policy

I. PURPOSE

This policy ensures that DACL programs and services meet the requirements of the Language Access Act (LAA). DACL must ensure equal access to programs and services to all people living in, working in, or visiting the District, regardless of their level of English proficiency.

II. AUTHORITY

This policy is consistent with DACL's mission, D.C. Official Code § 7-503.01.; the Civil Rights Act of 1964, 42 USC Ch. 21; the Language Access Act of 2004, D.C. Law 15-167; D.C. Official Code §2-1931 *et seq.*, eff. June 19, 2004 and its implementing regulations at 4 DCMR §1200 *et seq.*

III. APPLICABILITY

This policy applies to all DACL members, defined as employees, volunteers, grantees, and contractors providing direct services to the public on DACL's behalf.

IV. DEFINITIONS

Customer—an individual who seeks to access or participate in the services, programs, or activities offered by DACL.

Language Access Coordinator (LAC)—the DACL official who coordinates and supervises agency activities undertaken to comply with the provisions of this policy.

Language threshold—when a non-English language is spoken by a LEP/NEP population of at least 3% of the agency's customers or 500 individuals, whichever is less.

Limited English proficient (LEP)—an individual who does not use English as a primary language and who has a limited ability to speak, read, write, or understand it.

Members—all agency employees, volunteers, grantees, contractors, funded entities, and affiliates providing direct services to the public on behalf of DACL.

Non-English proficient (NEP)—a person who does not speak, read, write, or understand English.

Primary language—the language that a customer is most comfortable using. It is usually (but not always) the person's first or native language.

Sight Translation—when an interpreter reads a document written in one language and translates it orally into another language.

Vital Documents—the applications, notices, forms, agreements, and outreach materials that DACL publishes or distributes to inform customers about their rights or eligibility requirements for participation in agency programs.

V. REGULATIONS

A. Data Collection

DACL must collect and report data to OHR on the non-English languages spoken by LEP and NEP customers, language assistance resources, and which non-English languages meet DACL's language threshold. DACL and members must document all encounters with LEP/NEP customers, including which languages they speak, and report the data on a quarterly basis.

B. Signage

Public DACL facilities, including DACL-funded facilities and facilities where DACL-funded programs operate, must feature signage in all languages meeting DACL's language threshold informing customers of their right to assistance in a language they understand. Facilities must also feature the Language Line Desktop ID Guide and OHR's "I Speak" cards.

C. Translation

DACL and members must provide written translations of vital documents into all languages that meet its language threshold, including but not limited to: applications, notices, complaint forms, outreach materials, and other documents on customer rights or program eligibility requirements. Translations of vital documents must be as accessible to the public as the English versions are.

D. Interpretation

Members must establish and maintain full, effective communication with customers of all English proficiency levels. Members shall offer professional, qualified interpretation services either by phone or in person in the primary languages of all customers identified as LEP/NEP.

Members shall avoid assuming a customer's primary language or level of English proficiency and shall not discourage or bar LEP/NEP customers from seeking DACL services. Interpretation shall be provided in a timely manner, without unreasonable delay. Interpretation shall be provided for LEP/NEP customers attending DACL or grantee/contractor public meetings if the agency receives notice at least five (5) business days in advance of the public meeting. Family members, friends, and bystanders may not serve as interpreters unless the customer signs a waiver of language access rights.

E. Waiver of Language Access Rights

Customers may waive their language access rights in writing, using OHR-supplied waiver forms. If a written translation of the waiver form is not available in the customer's primary language, or if the customer is unable to read, DACL members may use sight translation to convey the contents of the form.

F. Bilingual Staff

Bilingual employees and grant-funded staff assessed by DACL through Language Line Solutions as proficient in both the English language and another language other than English may act as communication facilitators for the LEP/NEP population whose primary language they speak.

Communication facilitators must be able to communicate fluently and accurately, interpret exact concepts without distorting meaning, and understand confidentiality obligations.

If DACL requires additional capacity, it must give preference to qualified bilingual individuals when hiring for existing budgeted vacant public contact positions. The LAC shall keep a list of certified bilingual staff employed in public contact positions.

G. Language Access Training

All DACL members in public contact positions must understand the requirements and obligations for serving LEP/NEP customers. Training shall occur as part of onboarding for new members; existing staff shall be trained as part of continued professional development.

H. Outreach

DACL must develop a plan for conducting outreach to LEP/NEP communities in order to disseminate information about its language access services. Outreach activities may include organizing events, distributing printed material in diverse languages, participating in LEP/NEP community events, cosponsoring community events with organizations that serve LEP/NEP communities, and participating in events that target LEP/NEP communities.

I. Language Access Complaints

Any person or organization may file a public complaint alleging violation of the LAA through the OHR [Language Access Complaint Form](#) or the OHR phone number (202-727-4559). If a customer wishes to file a complaint, DACL members shall provide the customer with the above contact information and report the incident to the LAC.

J. Resources

DACL members shall have digital and hard-copy translations of vital documents; access to contracted in-person and telephonic interpreters, the list of DACL bilingual staff interpreters; and materials from OHR, such as “I Speak” Cards and Language ID Guides.

K. Funded entities

Language Access compliance requirements are included in the Grant Policy Manual (GPM). When signing the Grant Terms and Conditions, funded entities certify in writing they will follow the GPM.

L. APPROVAL

Director
Department of Aging & Community Living

Date

Effective Date: September 27, 2021

Review Date: September 26, 2022