

January 5, 2017

Kathy Payne, Executive Director Yadkin Valley Economic Development District, Inc. PO Box 309 Boonville, NC 27011

Dear Kathy:

In compliance with the Older Americans Act, Section 307 (4), OMB Omni Circular (2 CFR Chapter I, Chapter II, Part 200, et al.), Section 308 of the AAA Policies and Procedures Manual, and the Home and Community Care Block Grant (HCCBG) Agreement for the Provision of County Based Aging Services, an on-site monitoring visit was made December 1, 5 & 6, 2016. The PTRC Area Agency on Aging staff members on site to monitor were Bob Cleveland, Program Planner for Aging, Holly Sluder, Program Planner for Aging, and Joseph Dzugan, Aging Systems Coordinator. As a part of the procedure, programmatic compliance monitoring was conducted for the following HCCBG services:

- Congregate Nutrition for Surry and Yadkin Counties
- Home Delivered Meals for Surry and Yadkin Counties
- General Transportation for Davie, Surry, and Yadkin Counties
- Medical Transportation for Davie, Surry, and Yadkin Counties
- Unit of Service Verification for Legal Assistance

This assessment letter reviews specific aspects of the services provided, including 12 compliance criteria defined for each funding source. The assessment process included a review of compliance with the NC Division of Aging and Adult Services Standards, unit verification as it relates to services, reimbursement, and verification of compliance with the conflict of interest policy requirement in G.S. 143-6.1.

The assessment report is designed to:

- Identify those items which are commendable or show high achievement.
- Identify compliance or non-compliance with the applicable 12 compliance criteria and the requirement that non-profit entities have a notarized policy addressing conflict of interest.
- Identify the items not in compliance with the NC Division of Aging and Adult Services Standards that must be addressed in a corrective action plan.
- Document any technical assistance offered by the Piedmont Triad Regional Council Area Agency on Aging to further improve the service provided.

Fund Source: <u>Nutrition Services Incentive Program (NSIP)</u> CFDA: <u>#93.053</u> Program Name(s): <u>Congregate and Home Delivered Meals - NSIP</u>

| | Compliance Supplement Criteria Requirement | Compliance |
|----|--|------------|
| a. | Activities Allowed or Un-allowed: | Yes |
| b. | Allowable Cost/Cost Principles: | Yes |
| с. | Cash Management: | n/a |
| d. | Reserved | n/a |
| e. | Eligibility: | Yes |
| f. | Equipment and Real Property Management: | n/a |
| g. | Matching, Level of Effort, Earmarking: | n/a |
| h. | Period of Availability of Federal Funds: | Yes |
| i. | Procurement, and Suspension and Debarment: | Yes |
| j. | Program Income: | n/a |
| k. | Reserved | n/a |
| ١. | Reporting: | Yes |
| m. | Sub-recipient Monitoring: | Yes |
| n. | Special Tests and Provisions: | Yes |
| 0. | Conflict of Interest: | Yes |

Fund Source: <u>Title III C Grant for Nutrition Programs</u>

CFDA: <u>#93.045</u> Program Name(s): <u>Congregate Nutrition and Home Delivered Meals</u>

| | Compliance Supplement Criteria Requirement | Compliance |
|----|--|------------|
| a. | Activities Allowed or Un-allowed: | Yes |
| b. | Allowable Cost/Cost Principles: | Yes |
| с. | Cash Management: | n/a |
| d. | Reserved | n/a |
| e. | Eligibility: | Yes |
| f. | Equipment and Real Property Management: | n/a |
| g. | Matching, Level of Effort, Earmarking: | Yes |
| h. | Period of Availability of Federal Funds: | Yes |
| i. | Procurement, and Suspension and Debarment: | Yes |
| j. | Program Income: | Yes |
| k. | Reserved | n/a |
| ١. | Reporting: | Yes |
| m. | Sub-recipient Monitoring: | Yes |
| n. | Special Tests and Provisions: | Yes |
| 0. | Conflict of Interest: | Yes |

Description of Non-Compliance Findings

Congregate Nutrition – Surry and Yadkin Counties: None.

All client files reviewed were complete. There were no unverified units.

Home Delivered Meals – Surry and Yadkin Counties: None.

All client files reviewed were complete. There were no unverified units.

Subcontractor Monitoring – Nutrition Services

On August 22, 2013, the Division of Aging and Adult Services released Administrative Letter No. 13-15, entitled "Subcontractor Monitoring" followed on December 5, 2014 with Administrative Letter No. 14-14, also entitled "Subcontractor Monitoring." The purpose of these administrative letters was to establish policies and procedures for creating, evaluating and monitoring subcontracts between community service providers and other entities for the provision of Home and Community Care Block Grant (HCCBG) and other funds administered by the Area Agency on Aging (AAA). The administrative letters require that the AAA includes subcontractor monitoring results in the monitoring report letter. YVEDDI subcontracts both Congregate Nutrition and Home Delivered Meals to Golden Corral. YVEDDI will need to complete their caterer assessment and also file the revised HCCBG Subcontractor Performance Evaluation (SPE) forms for both Congregate Nutrition and Home Delivered Meals with the PTRC AAA by June 1, 2017.

Fund Source: <u>Title III B Grant for Support Services and Senior Centers</u> CFDA: <u>#93.044</u> Program Name(s): <u>Transportation</u>

| | Compliance Supplement Criteria Requirement | Compliance |
|----|--|------------|
| a. | Activities Allowed or Un-allowed: | Yes |
| b. | Allowable Cost/Cost Principles: | Yes |
| с. | Cash Management: | n/a |
| d. | Reserved | n/a |
| e. | Eligibility: | Yes |
| f. | Equipment and Real Property Management: | n/a |
| g. | Matching, Level of Effort, Earmarking: | Yes |
| h. | Period of Availability of Federal Funds: | Yes |
| i. | Procurement, and Suspension and Debarment: | Yes |
| j. | Program Income: | Yes |
| k. | Reserved | n/a |
| ١. | Reporting: | Yes |
| m. | Sub-recipient Monitoring: | n/a |
| n. | Special Tests and Provisions: | Yes |
| 0. | Conflict of Interest: | Yes |

Description of Non-Compliance Findings

<u>General Transportation – Davie, Surry, and Yadkin Counties:</u> None.

All client files reviewed were complete. The driver requirements and the vehicle requirements are all in compliance with Home and Community Care Block Grant standards. There were no unverified units.

Medical Transportation – Davie, Surry, and Yadkin Counties: None.

All client files reviewed were complete. The driver requirements and the vehicle requirements are all in compliance with Home and Community Care Block Grant standards. There were no unverified units.

Unit of Service Verification for Legal Assistance

Unit of service verification for Legal Assistance was conducted for the months of September and October, 2016. Unit of service verification for Legal Assistance was in compliance with Home & Community Care Block Grant (HCCBG) standards. There were no unverified units.

Comments, Technical Assistance, and Recommendations

Comments

The Senior Enrichment Program Director and her staff are to be commended for the well-organized client files and well-maintained records and for the efficient operation of the Home and Community Care Block Grant funded programs for older adults. The entire YVEDDI staff was very cooperative and pleasant to work with and readily provided answers and documentation for our inquiries.

Technical Assistance and Recommendations

During the PTRC Area Agency on Aging review of Congregate Nutrition sites' temperatures, it was discovered that the temperature setting on the refrigerator at one of the Congregate Nutrition sites had been turned to a higher setting. Since this facility is rented for community use, YVEDDI immediately instituted a practice for the Nutrition site manager to check the refrigerator temperature and setting every morning before the food arrives from the caterer.

We want to thank you for your assistance during the monitoring visit. If you have any questions, please contact us at 336.904.0300 or <u>jdzugan@ptrc.org</u>. Thank you for your continued service to older adults and their caregivers.

Sincerely,

Joseph Dzugan, Aging Systems Coordinator PTRC Area Agency on Aging

cc: Michael Ruffin, Interim Davie County Manager Chris Knopf, Surry County Manager Lisa Hughes, Yadkin County Manager Robin West, Davie County Finance Director Sarah Bowen, Surry County Finance Officer Gary Groce, Yadkin County Finance Officer Cindi Dixon, Chair, YVEDDI Board of Directors Lisa Martin-Money, Director, Senior Enrichment Program, YVEDDI Dick Wommack, Chair, Davie County Aging Services Planning Committee Donna Collins, Chair, Surry County Aging Services Planning Committee Robert Hutchins, Chair, Yadkin County Aging Planning Committee Blair Barton-Percival, Director, PTRC Area Agency on Aging Adrienne Calhoun, Assistant Director, PTRC Area Agency on Aging Kim Johnson, Senior Regional Long-Term Care Ombudsman, PTRC Area Agency on Aging Bob Cleveland, Program Planner for Aging, PTRC Area Agency on Aging Holly Sluder, Program Planner for Aging, PTRC Area Agency on Aging Teresa Jackson, Family Caregiver Support Program Specialist, PTRC Area Agency on Aging