

**CHAPTER 5**  
**AREA AGENCY ON AGING & DISABILITY OPERATION**  
**AND**  
**PROVISION OF SUPPORTIVE SERVICES**

**5-1 AUTHORITY**

**(1) Older Americans Act**

**OAA Section 305 (42 U.S.C. 3025) Organization**

OAA, Section 305 (a)(1)(E) - divide the State into distinct planning and service areas (or in the case of a State specified in subsection (b)(5)(A), designate the entire State as a single planning and service area), in accordance with guidelines issued by the Assistant Secretary, after considering the geographical distribution of older individuals in the State, the incidence of the need for supportive services, nutrition services, multipurpose senior centers, and legal assistance, the distribution of older individuals who have greatest economic need (with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas) residing in such areas, the distribution of older individuals who have greatest social need (with particular attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas) residing in such areas, the distribution of older individuals who are Indians residing in such areas, the distribution of resources available to provide such services or centers, the boundaries of existing areas within the State which were drawn for the planning or administration of supportive services programs, the location of units of general purpose local government within the State, and any other relevant factors.

**(2) State-Funded Home and Community Based Services**

Section 0030-2-.01 of the Rules of TCAD regarding State-Funded Home and Community Based Services for Elderly and Disabled Adults sets forth the responsibility for TCAD to implement the state-funded long-term care home and community based services program authorized by TCA Section 71-5-1416 which states that "Subject to the availability of funding, the commissioner shall designate in each year's appropriations bill an amount of money that can be used to increase

access to home and community-based services in the state-funded options program for persons who do not qualify for Medicaid long-term care services. This funding may be used to provide services such as home-delivered meals, homemaker services and personal care, and to reduce the waiting list for these services under the options program, or to offer transportation services or assistance to non-Medicaid-eligible individuals.”

### **(3) Public Guardianship for the Elderly Program**

In accordance with Tennessee Code Annotated, Section 34-1-101, the Tennessee Commission on Aging and Disability shall administer the Public Guardianship for the Elderly Program in cooperation with the Area Agency on Aging and Disability in each of the nine planning and service areas (PSAs).

The scope of the Public Guardianship for the Elderly Program shall extend to those persons 60 years or older who, due to physical or mental limitations, are unable to meet essential requirements of their physical health or to manage essential aspects of their financial resources, and have no family member, friend, bank or corporation willing and able to act on their behalf.

## **5-2 DESIGNATION OF AREA AGENCIES ON AGING AND DISABILITY**

The State Agency procedures for designation of Area Agencies on Aging and Disability (AAAD) are found in Section 0030-1-5-.02 of the Rules of the State of Tennessee.

## **5-3 AREA AGENCY ADVOCACY, PLANNING, AND SYSTEMS DEVELOPMENT RESPONSIBILITIES**

- (1) The AAADs shall be the focal points in the planning and service area relative to all aging issues on behalf of all older persons in the planning and service area. In accordance with the OAA, the AAADs shall proactively carry out, under the leadership and direction of the State agency, a wide range of functions related to advocacy, planning, coordination, inter-agency linkages, information sharing, brokering, monitoring and evaluation, designed to lead to the development or enhancement of comprehensive and coordinated community based systems in, or

serving, each community in the planning and service area. These systems shall be designed to assist older persons in leading independent, meaningful and dignified lives in their own homes and communities as long as possible. Each activity undertaken by the agency, including planning, advocacy, and systems development, will include a focus on the needs of low-income older individuals, including low-income minority older individuals, older individuals with limited English, and older individuals residing in rural areas.

- (2) Since 2001, the AAADs have also administered Home and Community Based Services for older persons and adults with physical disabilities through the state-funded OPTIONS for Community Living program. (TCA 71-2-104 (a) Creation and composition of commission)

### **5-3-.01 OLDER AMERICANS ACT ADVOCACY**

Advocacy responsibilities of the AAAD:

- (1) The AAAD shall serve as the public advocate for the development or enhancement of comprehensive and coordinated community-based systems of services in each community throughout the planning and service area.
- (2) In carrying out this responsibility, the AAAD shall:
  - (a) monitor, evaluate, and, where appropriate, comment on all policies, programs, hearings, levies, and community actions, which affect older persons;
  - (b) solicit comments from the public on the needs of older persons;
  - (c) represent the interests of older persons to local level and executive branch officials, public and private agencies or organizations;
  - (d) undertake on a regular basis activities designed to facilitate the coordination of plans and activities with all other public and private organizations, including units of general-purpose local government, with responsibilities affecting older persons in the planning and service area to promote new or expanded benefits and opportunities for older persons.
- (3) Each AAAD shall undertake a leadership role in assisting communities throughout the planning and service area to target resources from all appropriate sources to meet the needs of older persons with greatest economic or social need, with particular

attention to low-income older individuals, including low-income minority older individuals, older individuals with limited English, and older individuals residing in rural areas. Such activities may include location of services, the accessibility of facilities where services or public benefits are delivered, and specialization in the types of services most needed by these groups to meet this requirement.

- (4) No requirement in this section shall be deemed to supersede a prohibition contained in the Federal appropriation on the use of Federal funds to lobby the Congress; or the lobbying provision applicable to private nonprofit agencies and organizations contained in the Uniform Guidance

### **5-3-.02 SYSTEMS DEVELOPMENT**

- (1) According to the OAA, the AAAD is mandated to implement a comprehensive and coordinated system for the purpose of facilitating accessibility to and utilization of, all supportive services and nutrition services provided within the planning and service areas. The system shall develop and make the most efficient use of supportive services and nutrition services and use available resources efficiently.
- (2) Tennessee HCBS Rule **71-2-105(b)(1)** mandates that the AAAD will provide a single point of entry system to access home and community based services for older persons and other adults with disabilities. The goal is to provide a customer driven seamless system of service delivery allowing the AAAD to arrange services through a combination of funding sources. This system will provide an opportunity for matching consumers with the most efficient, economical service package for meeting the needs of those at risk of losing their independence, thus enabling the consumer to avoid premature long-term care institutionalization.
- (3) In the state of Tennessee, AAADs acts as the ADRC.

### **5-3-.03 DIRECT PROVISION OF SERVICES BY THE AREA AGENCY AND DISABILITY (AAAD)**

#### **(1) Older Americans Act (OAA)**

The AAADs contracts with service providers to provide all OAA services under the area plan, except for information and assistance services and case management which the AAADs may provide directly (see OAA Section 307 (a) (8) State Plans). The AAAD shall submit a waiver request and obtain approval from the State Agency in

order to provide any direct services funded by OAA. No supportive services, nutrition services, or in-home services will be directly provided by the AAAD, except where, in the judgment of the State Agency, provision of such services by the AAAD is necessary to assure an adequate supply of such services, or where such services are directly related to such AAAD administration functions, or where such services of comparable quality can be provided more economically by the AAAD. The contracts shall include the scope of services provided by the State Agency for Ombudsman, Transportation, Nutrition, Legal Assistance, Senior Centers, and other services as specified in each area plan. In accordance with the OAA Section 306 (7)(C), evidence-based programs can be implemented either through the AAAD or service providers without the need for a waiver request to the State Agency.

**(2) OPTIONS for Community Services (OPTIONS)**

The AAAD must contract with service providers to provide OPTIONS services under the area plan, except for information and assistance services and case management which the AAADs may provide directly. The services funded through the State for this program include homemaker services, personal care services, and home delivered meals. Other services provided by State of Tennessee funding may be authorized by the AAAD director on a case-by-case basis provided the annual amount of funding per individual does not exceed \$7,000 annually regardless of funding source.

**(3) Public Guardian**

The Public Guardian may serve in the following capacities if an individual who meets the guidelines for the program and has no family member, friend, bank or corporation willing and able to serve: as conservator, representative payee, and attorney in fact under a durable power of attorney for finances and/or health care. Any application received to serve a person under the age of 60 must be approved by TCAD. See Guardian Chapter.

**(4) State Health Insurance Assistance Program**

Each Area Agency on Aging shall operate a district-wide SHIP to provide information, counseling and assistance on Medicare, Medicaid and all other related health insurance issues for persons with Medicare, persons nearing Medicare eligibility, their adult children and other caregivers, their health care providers and

other advocates. The district SHIP shall be required to have a presence in each county within the district by a means approved by the State SHIP Director (e.g., volunteer placement at senior centers or other similar facilities frequented by people with Medicare).

**(5) Collaborative Response to Elder and Vulnerable Adult Abuse**

This three year program is from the Tennessee Offices of Criminal Justice Program (OCJP) through the Victims of Crime Acts (VOCA) of 1984. The CREVAA program will provide services to elder and vulnerable adult victims of crime in all ninety-five (95) Tennessee counties.

**(6) Discretionary Grants**

From time to time TCAD is awarded various discretionary grants and may write the AAAD to be a grant partner/contractor

**5-3-.04 SERVICE PROVIDER RESPONSIBILITIES and REQUIREMENTS**

**(1) Older Americans Act Regulations**

(a) Service provider general requirements are found in Section 1321.65 of the Older Americans Act Regulations.

(b) Contracts and Agreements—The initial year of the new area plan cycle shall require a well-publicized request for proposal for services included in the area plan. Contracts in subsequent years may be negotiated with existing providers or request for proposals may be issued

each year. Each contract for OAA services or agreements between the AAAD and service provider will specify that:

(i) services will be provided to older individuals who have the greatest social need with particular attention to low-income minority individuals; and

(ii) service providers receiving state appropriations or OAA funds must comply with TCAD contracting guidelines, program standards and service descriptions including the use of standardized contract format and scopes of service distributed by TCAD as minimum requirements for respective services.

(c) Licensure Requirements. The AAAD shall assure that all agencies,

organizations and individuals providing OAA services under the area plan are, where appropriate, properly licensed in accordance with the regulations of the State and/or local public jurisdiction requiring such licensing or meet the requirements for licensure.

- (d) Bonding. The AAAD shall require agencies, organizations and individuals providing services under the area plan to obtain sufficient bond coverage for protection of the AAAD and the State Agency from theft, forgery, embezzlement and fraud losses by the service provider agency, any of its agents or employees, full or part-time.
- (e) Insurance Requirements. The AAAD shall assure that it and all agencies, organizations and individuals providing services under the area plan either provide a statement of self-insured status or procure and maintain payment of premiums on policies of insurance coverage to:
  - (i) adequately protect personal and real property whose acquisition cost was borne in whole or in part as a direct charge to Title III or state funds from loss or damage; and
  - (ii) adequately cover all claims which may arise related to accidents involving personal injuries and/or use of products and services under the area plan.
- (f) All service providers either private for-profit or not-for-profit organizations must be incorporated under the laws of the state in which their principal place of business is located.
- (g) AAADs must take affirmative measures to assure that small businesses and agencies and organizations operated or owned by minorities or women are utilized as contractors and suppliers for goods and services funded under the area plan.
- (h) AAADs are encouraged to be in accordance with CFR 435.22(2)(j) which states “consistent with the national goal of expanding the opportunities for women-owned and minority-owned business enterprises, recipients are encouraged to use women-owned and minority-owned banks (a bank which is owned at least 50 percent by women or minority group members).”
- (i) Contributions for Aging Program Services. The AAAD shall assure that all

agencies and organizations providing services under the area plan shall provide the older persons receiving such services with the opportunity to contribute all or part of the costs of the services provided. Specific instructions are found in the fiscal chapter, Chapter 1, for the management of voluntary contributions and the cost-share procedures.

(j) Code of Conduct

- (i) No service provider staff person or agent shall solicit or accept gratuities, favors, or anything of monetary value from service provider contractors, potential contractors or participants.
- (ii) To the extent possible under local, state, and federal law, rules, and regulations, penalties or other disciplinary actions will be applied for violations of this code by employees of OAA service provider agencies.

**5-4 ORGANIZATION AND STAFFING OF THE AREA AGENCY ON AGING AND DISABILITY**

**5-4-.01 ELIGIBLE ORGANIZATION UNIT**

According to OAA, an AAAD may be either:

- (1) An agency whose single purpose is to administer programs for older persons; or,
- (2) A separate organizational unit within a multi-purpose agency that functions only for purposes of serving as the Area Agency on Aging. A multi-purpose agency must delegate all necessary authority and responsibility under the OAA and other state and federally funded programs to the separate organizational unit within the agency. The AAAD Director must be directly supervised by the multi-purpose agency's Executive Director. If the board of the organizational unit has members that include staff from TCAD, TennCare, or service providers with a current contract with the AAAD, those members must sign a conflict of interest statement that precludes them from voting on or discussing issues related to the administration of the Area Plan.

**5-4-.02 AUTHORITY OF THE AREA AGENCY ON AGING AND DISABILITY**

The AAAD must have legal authority and organizational capacity to develop the area plan on aging, and to carry out effectively the functions and responsibilities prescribed for an AAAD under Section 306 of the OAA and other state and federally funded programs addressing the needs of older persons and other adults with disabilities to the



separate organizational unit within the agency.

#### **5-4-.03 AAAD STAFFING REQUIREMENTS**

- (1) The AAAD must develop and implement a staffing plan consistent with federal and state requirements which sets forth the number and type of personnel employed to carry out the functions of the AAAD. The AAAD is responsible for:
  - (a) recruiting and employing adequate numbers of staff members to develop and administer the area plan, and
  - (b) carrying out the functions and responsibilities prescribed by the OAA and other state and federally funded programs addressing the needs of older persons and other adults with disabilities, and its accompanying regulations and these policies.
- (2) The AAAD will be headed by a qualified individual (director), who is assigned full-time solely on the planning, development and implementation of the area plan, management and operation of daily activities of the AAAD, and advocacy on behalf of all older persons within the PSA. The director shall meet the qualifications as referenced in the AAAD Staffing Chart at the end of this chapter.
- (3) Adequate numbers of qualified staff are to be assigned full-time or part-time to the AAAD for the development and administration of the plan and the conduct of required AAAD functions. Minimum standards for the number and types of staff positions, as referenced in the AAAD Staffing Chart at the end of this chapter, in addition to the director, shall be:
  - (a) a financial specialist, qualified by education and financial experience who, along with other AAAD assigned responsibilities, shall be responsible for the fiscal accounting of the AAAD, budgeting, financial monitoring of, and technical assistance to service providers on a full-time basis as referenced in the AAAD Staffing Chart at the end of this chapter of the manual;
  - (b) a program specialist/coordinator, who along with other AAAD assigned responsibilities, shall be responsible for program monitoring/quality assurance of, and technical assistance to service providers on a full-time basis as referenced in the AAAD Staffing Chart at the end of this chapter of the manual;
  - (c) additional staff may be needed to insure effective monitoring of service contracts

issued by the AAAD. Requests for less than the minimum number of staff positions must be submitted as a waiver to these state policies on the appropriate area plan exhibit form and include a detailed justification statement.

- (4) Approval of the AAAD's staffing plan shall be through approval of the area plan.
- (5) The AAAD shall submit in the area plan a Training and Staff Development Plan for staff, service providers and volunteers. The plan should include conferences, meetings and in-service training organized for staff or service providers. In addition to the plan:
  - (a) staff shall attend State sponsored training events;
  - (b) staff shall acquire continuing education to maintain certification and/or licensure for their respective program or position requirements;
  - (c) staff shall be encouraged to attend community or regional training events that will enhance their job performance; and
  - (d) each staff member's personnel file shall include documentation of all training, including but not limited to Title VI, HIPPA, and Emergency Preparedness.
- (6) Nepotism – Hiring of Relatives
  - (a) Two or more members of an immediate family shall not be employed by a AAAD if such employment will result in an individual supervising a member of his/her immediate family, or if one member occupies a position which has influence over another's employment, promotion, salary administration and other related management or personnel considerations.
  - (b) For the purpose of this policy, the immediate family shall include spouse, mother, father, sister, brother, son, daughter, mother-in-law, father-in-law, grandmother, grandfather, grandson, and granddaughter and any step parent of the aforementioned family tie.
  - (c) This policy shall be applicable for multipurpose agencies only for that program component which is funded wholly or in part by OAA funds or State of Tennessee appropriations for aging programs.

#### **5-4-.04 AAAD ADVISORY COUNCIL FUNCTIONS AND COMPOSITION**

- (1) General requirements for AAAD advisory councils are found in Section 1321.57 of the Older Americans Act Regulations.
- (2) The opinions and recommendations of the advisory council are to be solicited by the AAAD director and governing body, and are to be given serious consideration, prior to determining particular actions and formulating policies.
- (3) The advisory council shall participate in the development and implementation of the area plan. Such area plan shall contain a written statement from the chairperson of the advisory council verifying the council's participation. The area plan does not require approval by the AAAD advisory council, but does require a review and an opportunity to comment.
- (4) The AAAD advisory council shall function in an advisory rather than a policy making or decision making capacity.
- (5) An individual, whose salary is paid for in whole or in part through OAA and State appropriated funds, may not serve as a voting member of an AAAD or service provider agency advisory council.
- (6) No person who is on the AAAD or service provider agency board of directors shall serve as a voting member of the advisory council for such body.
- (7) The AAAD must provide staff and assistance to the advisory council.
- (8) The advisory council shall adopt bylaws which establish tenure of membership, rotation of terms, methods of selection of membership and number of members. Such methods shall provide for appropriate social, economic, professional, and geographic representations

## **5-5 AREA PLAN PURPOSE, CONTENT, SUBMISSION, REVIEW AND APPROVAL PROCESS**

### **5-5-.01 PURPOSE OF THE AREA PLAN**

- (1) The area plan for programs on aging is a detailed statement of the manner in which the AAAD is developing a comprehensive and coordinated community-based system throughout the planning and service area (PSA) for all services authorized under the OAA and state funded programs. The AAAD will receive funding under the OAA and state funded programs with an approved area plan. An AAAD can expend funds

under the OAA and state funded programs for activities under its approved plan.

- (2) An area plan covers a four year period and shall be updated annually as specified by the State Agency.
- (3) An AAAD must submit its area plan, or any amendment, to the State Agency in accordance with the uniform area plan instructions and on the uniform area plan format provided by the State Agency.
- (4) The State will allocate federal funds to PSAs in conformity with the intrastate funding formula as described in Section 0030-1-10-.01 of the Rules of the State of Tennessee.

#### **5-5-.02 CONTENT OF AREA PLAN**

- (1) Requirements for content of an area plan on aging are found in Section 306(a) through 306(f) of the Older Americans Act.
- (2) The State Agency will send out the area plan format to the AAAD Director's detailing the area plan schedule and instructions for completing and submitting the area plan or area plan update.
- (3) At least two weeks prior to submission of the completed four year area plan, the AAAD shall conduct a public hearing(s) for the purpose of providing the opportunity for older persons, the general public, officials of general purpose local government and other interested parties to comment on the area plan. Public hearings are only required during an area plan update if the AAAD is requesting a new waiver.
- (4) The area plan must be approved by the governing board of the AAAD and signed by the AAAD Director, chair of the advisory council, director of the grantee agency, and chair of the grantee agency board

#### **5-5-.03 SUBMISSION OF THE AREA PLAN**

- (1) An area plan must be submitted to the State Agency in accordance with the schedule and procedures established by the State Agency and included in the area plan format.
- (2) One signed e-mailed version of the area plan or annual update must be submitted to the State Agency in accordance to the timetable established by the State Agency.

#### **5-5-.04 REVIEW OF THE AREA PLAN**

The following schedule outlines the basic process for review of area plans:

- (1) The State Agency will conduct a review of each area plan or update and will provide

the AAAD written recommendations or conditions of the plan within 15 business days after it is submitted.

- (2) AAAD's that receive written recommendations or conditions must provide a written response and/or revised area plan within the specified time provided by the State Agency.

#### **5-5-.05 PROCEDURES FOR APPROVAL OF THE AREA PLAN**

- (1) The State Agency will approve an area plan or update when the plan meets all of the requirements prescribed by the State Agency.
- (2) The State Agency shall notify the AAAD of its approval of the area plan or update through the issuance of a written approval letter signed by the Executive Director of the State Agency.

#### **5-5-.06 APPROVAL OF AN AREA PLAN WITH CONDITIONS**

- (1) The State Agency may approve an area plan or update with conditions when necessary.
- (2) The conditions of approval will be in writing and will be clearly noted in the written letter of approval.
- (3) All conditions placed on an approved area plan will be consistent with the authority delegated to the State Unit on Aging.
- (4) When an area plan is approved with conditions, it shall be incumbent upon the grantee to meet these conditions within the specified time frame.

#### **5-5-.07 AMENDMENTS TO THE AREA PLAN**

The AAAD must submit an Area Plan amendment to the State Agency if there are:

- (a) Significant changes in plan goals and/or objectives;
- (b) Significant changes in program content; or
- (c) New programs to be initiated with OAA funds or State funds.

Area Plan amendments must be submitted to the State Agency along with a letter from the Executive Director of the Grantee Agency acknowledging their review and approval of the amendment. Once the State Agency has reviewed and approved the amendment, a letter of approval will be sent to the Executive Director of the Grantee Agency.

#### **5-5-.08 AAAD Planning**

(1) An AAAD must engage in a continuous process of planning for older persons within the planning and service area (PSA). The planning process must reflect the following activities:

- (a) preparation and development of an area plan for a planning and service area;
- (b) provision, through a comprehensive and coordinated system, for supportive services, nutrition services, and senior centers, within the PSA;
- (c) provision of assurances that an adequate proportion, as required under section 307(a)(2), of the amount allotted for part B to the planning and service area;
- (d) access to services;
- (e) in-home services;
- (f) legal assistance;
- (g) senior centers;
- (h) coordination with agencies, that develop or provide services for individuals with disabilities, in planning, identification, assessment of needs, and provision of services for older individuals with disabilities, with particular attention to individuals with severe disabilities and older individuals at risk for institutional placement;
- (i) consideration of the view of recipients of services;
- (j) serve as the advocate and focal point for older individuals;
- (k) provision of assistance to older individuals caring for relatives who are children, and respite for families;
- (l) establishment of an advisory council;
- (m) establishment of effective and efficient procedures for coordination of services with other agencies;
- (n) coordination with mental health service providers;
- (o) facilitation of the area-wide development and implementation of a comprehensive, coordinated system for providing long-term care in home and community based settings;
- (p) provision of assurances that available case management services are provided to persons at risk of institutionalization;
- (q) provision of assurances that the agency on aging carries out the State Long-Term

- Care Ombudsman program;
- (r) provision of a grievance procedure for older individuals who are dissatisfied with or denied services;
  - (s) establishment of procedures for coordination of services;
  - (t) assessment and prioritization of the kinds and levels of services needed by older persons in the PSA;
  - (u) provision of ongoing quality assurance/monitoring activities designed to obtain feedback useful for revision and refinement of goals and objectives;
  - (v) assignment of adequate numbers of qualified staff and financial resources to carry out planning responsibilities;
  - (w) establishment of procedures that provide for the involvement of participants and service provider agencies in the planning process
  - (x) development of a documented method for distributing available resources throughout the PSA in an equitable manner according to need; and
  - (y) adherence to record retention both electronic and hard copy of five (5) years plus the current year.

**5-5-.09 STANDARDS FOR CONDUCTING PUBLIC HEARINGS FOR REVIEW OF AREA PLANS AND AMENDMENTS OF THE PLAN**

- (1) At least two weeks before submitting a 4 year area plan to the State Agency, an AAAD must hold at least one public hearing. Public hearings are also required when the AAAD is requesting any new waivers not included in the 4 year area plan. Public hearing(s) must be held within the geographical boundaries of the planning and service area (PSA) for which the area plan is developed.
- (2) The AAAD must give adequate notice to older persons and adults with disabilities, public officials and other interested parties of the time(s), date(s), and location(s) of the public hearing(s).
- (3) The AAAD must hold the public hearing(s) at a time and location that permits older persons and adults with disabilities, public officials and other interested persons reasonable opportunity to participate.
- (4) The AAAD will develop procedures to assure effective participation of actual or

potential consumers of services under the area plan at the local level through public hearings.

- (5) The AAAD must submit the area plan for review and comment, to the AAAD advisory council prior to submission to the State Agency. The advisory council shall review the 4 year area plan before the AAAD conducts public hearings on the plan. If comments made at the public hearing result in changes to the area plan, the advisory council shall make provisions for a final review of the area plan prior to the AAAD's submission of the area plan to the State Agency. Any amendments made to the area plan must be submitted to the AAAD advisory council for review and comment prior to submission to the State Agency according to OAA Sec. 306(a)(6)(D).
- (6) The AAAD must apply the following standards in the conduct of its public hearing(s) according to OAA Sec. 306(a)(6)(D).
  - (a) The public hearing(s) must be scheduled to allow sufficient time for review of the area plan by the advisory council at least one week prior to the date of the public hearing(s).
  - (b) Public hearings should be conducted at easily accessible public locations, such as community centers, public auditoriums, public schools or community colleges, senior centers, or county courthouses.
  - (c) Notice of time and place of the public hearing(s) must be given at least two weeks in advance of the hearing(s), for example, by paid advertisement or news release in the local county/district newspaper, radio, or television station(s). Wherever possible, notice should be given to possible participants through senior centers, nutrition sites, county courthouses, and post offices.
  - (d) Members of the AAAD advisory council should be in attendance, introduced, and assist in the conduct of the hearing(s). Also, a list of the names of the AAAD advisory council members, and the counties they represent should be provided at the hearing.
  - (e) The director, or program leader, should present each program objective and allow for discussion or questions on each. All questions or comments from participants should be recorded..



- (f) As a minimum, the hearing(s) must include the following:
  - (i) an explanation of the OAA and a description of services funded under the Act;
  - (ii) an explanation of the function and responsibilities of an AAAD, what an area plan represents, the period of time it covers, and why a public hearing is required;
  - (iii) an explanation of the differences between national, state and locally developed objectives;
  - (iv) an explanation of all terms and phrases used in presenting the objectives which may not be easily understood by participants; and
  - (v) details and explanations of proposals to pay for program development and coordination as a cost of supportive services.
- (g) Documentation of the methods used to distribute aging and disability funds, within State Agency guidelines, among service providers must be available at the public hearing(s).
- (h) The AAAD must obtain review and comment from the general public including older persons, government, and the aging and disability service network prior to using additional amounts of direct supportive service funds for program development and coordination.
- (7) The results of the public hearing must be reported in the area plan in the appropriate exhibit. Significant comments made during the hearing and the response by the AAAD toward incorporation of these comments into the area plan must be included.
- (8) Summaries of the comments made at the public hearing(s) must be available at the office of the AAAD after the public hearing(s).
- (9) Participation of the Advisory Council must be reported in the area plan in the appropriate exhibit.
- (10) All records of the public hearing(s) must be on file at the AAAD as a part of the official area plan file.

#### **5-5-.10 SUSPENSION OF AREA PLANS**

The State Agency's procedures for suspension of area plans are found in Section 0030-1-

5-.05 of the Rules of the State of Tennessee.

#### **5-5.11 TERMINATION OF AREA PLAN FUNDING**

The State Agency's procedures for termination of area plans are found in Section 0030-1-5-.06 of the Rules of the State of Tennessee.

#### **5-5.12 CLOSE-OUT PROCEDURES**

When federal support for an area plan is terminated on completion of the final approved budget year or earlier, the following policies and procedures shall adhere.

- (1) The AAAD shall complete and submit to the State Agency, within sixty (60) days after the date of completion or termination, a final program and financial report and any other financial or performance reports required as a condition of the grant.
- (2) The State Agency shall make a settlement for any upward or downward adjustments to the federal share of costs after these reports are received.
- (3) The AAAD shall dispose of all equipment purchased with OAA funds in accordance with those procedures described in the Financial Chapter of these policies. Any funds realized from the sale of such equipment or supplies are an adjustment in program costs.
- (4) In the event a final audit has not been performed prior to closeout of the grant, the State Agency retains the right to recover an appropriate amount after fully considering the recommendations on disallowed costs resulting from an audit.
- (5) The AAAD shall provide for the closeout of all service providers in accordance with the Financial Chapter of these policies.

### **5-6 PROGRAM REPORTING AND REVIEW REQUIREMENTS FOR AREA AGENCIES ON AGING AND DISABILITY**

#### **5-6-.01 REPORTS**

- (1) SAMS data reporting data submitted in these reports are based on the state fiscal year, which begins on July 1 and ends the following June 30, regardless when funding started.
- (2) Reports are due in the State Agency's office on the twentieth (20th) day of the month

following the quarter being reported on. If the due date falls on a weekend or holiday, the reports will be due on the following workday.

- (3) Required reports must be submitted to the State Agency according to the instructions and schedule provided. Failure to comply with the report requirements may result in either withholding of funds or possible suspension/termination of operations. This procedure is necessary since late or improperly completed reports often prevent the State Agency from complying with Administration on Aging (AoA) report requirements or from properly carrying out its management function.
- (4) The State Agency requires each AAAD to establish a program reporting system that will ensure the provision of accurate program reports from service providers covered by the area plan. Such reports are deemed necessary for the AAAD to meet its reporting requirements to the State Agency and to facilitate proper administration of the area plan.

#### **5-6-.02 TCAD Monitoring and Program Review of the AAAD**

##### **Purpose of Section**

Monitoring activities are performed to ensure the AAAD programs adhere to the terms and conditions of the grant and/or contract with Tennessee Commission on Aging and Disability (TCAD).

TCAD will monitor the program and fiscal performance of all AAADs receiving federal or state contracts, or grant award funding from the Tennessee Commission on Aging and Disability.

##### **(1) Scope of Monitoring**

- a. Program Monitoring. Annually, the TCAD will monitor AAADs to determine that they are operating effectively and according to applicable program standards. Areas included in program monitoring may include, but are not limited to, TCAD program policy and manual, federal and state contract, and state rules and regulations.
- b. Fiscal Monitoring. The TCAD will monitor the AAAD to determine that each establishes and maintains, as appropriate, a fiscal system according to generally accepted accounting principles, that the conditions of the grant and/or contract award

document are met, that the service provider maintains an adequate system of internal accounting and administrative controls, and that funds are requested, expended, and reported according to the grant and/or contract award. Specific areas of fiscal operations that may be monitored include, but are not limited to, the following:

- i. appropriateness of the fiscal system and the written policies and procedures used by the service provider;
- ii. accuracy and timeliness of fiscal reporting information;
- iii. service provider's understanding of fiscal requirements and capability to perform; and,
- iv. appropriate use of grant and/or contract funds, as written in the grant and/or contract award and this Manual.

## **(2) Methods of Monitoring**

The TCAD shall conduct program and fiscal monitoring through any of several types of activities, including the following:

- a. Use approved TCAD monitoring tools .
- b. Review of monthly invoice for reimbursement (IFR), independent audit reports, and other written communication.

## **(3) TCAD On-site Compliance Reviews**

- a. The TCAD shall monitor each AAAD annually during the state fiscal year. A Civil Rights (Title VI) review shall be a component of the TCAD review.

An on-site compliance review must be followed with a formal written report by the TCAD to the grantee agency/AAAD. The report shall be emailed, mailed or faxed to the grantee agency/AAAD **within 30 calendar days** of the site review. The report shall include: AAAD monitored, the date of the compliance review; observations, recognition of

strengths (optional); specify areas of noncompliance citing the standard or policy; and any recommendations to promote improvements of services.

**(4) Plan of Correction**

When responding to findings listed in the final report, choose from one (1) of the following responses and provide explanation for the response.

**Concur:** The AAAD is in agreement with the remarks and findings cited in the monitoring report as being accurate.

**Concur in Part:** The AAAD is in partial agreement with the overall conclusions cited in the monitoring report; however, it seeks to have certain information amended due to inaccuracies such as dates, names, etc. This response is appropriate whenever the Agency has evidence to refute some conclusions drawn in the monitoring report. Any perceived inaccuracies must be substantiated with supporting documentation provided to TCAD for review.

**Do Not Concur:** The AAAD rejects all the conclusions and findings in the monitoring report as groundless and without merit. The Agency maintains that all areas subject to review adhere to the requirements within the Scope of Services cited in the contract; TCAD program and Policy Manual; the Federal/State statutes and laws. Such situations must be addressed by the Program Director.

All correspondence between the TCAD and the AAAD concerning the resolution of the findings will become part of the final monitoring record. Plan of Correction must be received by the AAAD in 30 calendar days of the date sent.

**(5) Final Authority in a Corrective Action Challenge:**

During the Corrective Action process should an impasse occur between a subrecipient and the TCAD monitors over a finding or appropriate Plan of Correction, the TCAD Executive Director will act as the final authority to settle the dispute. This final recourse while available to subrecipient it is rarely used.

## **5-6-.02 AAAD Monitoring and Program Review**

### **Purpose of Section**

Monitoring activities are performed to ensure the service provider's adhere to the terms and conditions of the grant and/or contract with the Area Agencies on Aging and Disabilities.

The AAAD will monitor the program and fiscal performance of all service providers receiving federal or state contracts, or grant awards passed through from the Tennessee Commission on Aging and Disability for the purpose of providing supportive programs and services to older individuals and adults with disabilities.

### **(1) Scope of Monitoring**

a. Program Monitoring. Annually, the AAAD will monitor service providers to determine that they are operating effectively and according to applicable program standards. Areas included in program monitoring may include, but are not limited to, the following:

- i. performance of the service(s) and activities specified in the approved grant and/or contract;
- ii. conformance with the AAAD and/ or approved staffing pattern and staff qualifications;
- iii. conformance with all civil rights, equal employment opportunity, and minority contractor requirements;
- iv. adherence to the contract, and TCAD Program and Policy Manual, for service delivery operations; and,
- v. other performance aspects, as appropriate.

b. Fiscal Monitoring The AAAD should develop and implement a review schedule for monitoring all services funded with Federal and State funds provided by TCAD. The AAAD shall monitor all service providers at least annually using monitoring tools approved by TCAD that are based on the *Program and Policy Manual*. If deficiencies that result in a finding are found during the monitoring process, the AAAD shall require the service provider to submit a Plan of Correction and conduct follow-up monitoring until all

findings are resolved. If findings are not resolved to the satisfaction of the AAAD, the AAAD may take any type of correction action, including but not limited to, termination of the contract. In determining whether a Service Provider is a subrecipient or a contractor, refer to HHS *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards* in section 75.351.

## **(2) Methods of Monitoring**

The AAAD shall conduct program and fiscal monitoring through any of several types of activities, including the following:

- a. Use approved TCAD monitoring tools .
- b. Review of monthly and/or quarterly fiscal reports, quarterly program reports, compliance reports, audit reports, agreed-upon procedures reports, and other written communication. These reviews will be conducted by the AAAD or their representatives, and may be verified through site visits or through other communication.
- b. Discussion between the AAAD's staff and the service provider's staff via telephone communications and/or written correspondence.
- d. Examination of program and fiscal records and discussions with service provider staff during periodic or compliance review visits conducted on site.

## **(3) Area Agency on Aging On-site Compliance Reviews**

- a. The AAAD shall monitor each service provider annually during each fiscal year prior to re-contracting. A Civil Rights (Title VI) review shall be a component of the service provider review.
- b. An on-site compliance review must be followed with a formal written report by the AAAD to the responsible service provider listed on the contract. The report shall be emailed, mailed or faxed to the service provider **within 30 calendar days** of the site review. The report shall include: who conducted the monitoring, name of the provider, the date of the compliance review; recognition of strengths (optional); specify areas of noncompliance citing the standard or policy; and any recommendations to

promote improvements of services. When a Senior Center is monitored a copy of the monitoring report and plan of correction must be given to the senior center director, and governing entity.

**(4) Plan of Correction**

When responding to findings listed in the final report, choose from one (1) of the following responses and provide explanation for the response.

**Concur:** The Subcontracting Agency is in agreement with the remarks and findings cited in the monitoring report as being accurate.

**Concur in Part:** The Subcontracting Agency is in partial agreement with the overall conclusions cited in the monitoring report; however, it seeks to have certain information amended due to inaccuracies such as dates, names, etc. This response is appropriate whenever the Agency has evidence to refute some conclusions drawn in the monitoring report. Any perceived inaccuracies must be substantiated with supporting documentation provided to the AAAD for review.

**Do Not Concur:** The Subcontracting Agency rejects all the conclusions and findings in the monitoring report as groundless and without merit. The Agency maintains that all areas subject to review adhere to the requirements within the Scope of Services cited in the contract; TCAD program and Policy Manual; the Federal/State statutes and laws. Such situations must be addressed by the Program Director.

All correspondence between the AAAD and the Subcontracting Agency concerning the resolution of the findings will become part of the final monitoring record. The Plan of Correction must be received by AAAD within 30 calendar days of the date sent.



## **5-7 CONFIDENTIALITY REQUIREMENTS FOR PARTICIPANT INFORMATION**

Confidentiality requirements for participant information are found in Section 0030-1-5-.08 of the Rules of the State of Tennessee.

<https://publications.tnsosfiles.com/rules/0030/0030-01/0030-01-05.pdf>

## **5-8 PUBLIC INFORMATION REQUIREMENTS FOR AREA AGENCIES ON AGING AND DISABILITY AND SERVICE PROVIDER AGENCIES (FREEDOM OF INFORMATION)**

### **5-8-.01 OPEN MEETINGS**

Open meetings requirements are found in Section 0030-1-5-.09 of the Rules of the State of Tennessee.

### **5-8-.02 FREEDOM OF INFORMATION**

Freedom of information requirements are found in Section 0030-1-5-.10 of the Rules of the State of Tennessee.

### **5-8-.03 PUBLICATIONS**

- (1) Any books, reports, pamphlets, papers or articles based on activities receiving support from aging funds under the OAA must contain acknowledgment of that support.
- (2) The State Agency reserves the option to receive free of charge up to ten (10) copies of any publication developed as part of AAAD planning and supportive service operations, and ten (10) copies of any publication based upon such operations.
- (3) The Administration on Aging (AoA) reserves the option to receive free of charge up to twelve (12) copies of any publication developed as part of AAAD planning and supportive service operations, and two (2) copies of any publication based upon such operations.
- (4) Where AAAD planning and supportive service operations result in a book or other material, the copyright policies in the Fiscal Chapter shall be followed.

## **5-9 ENFORCEMENT OF FEDERAL AND STATE LAWS, POLICIES AND REGULATIONS**

- (1) An AAAD must assume full contractual responsibility for assuring that all funds

awarded to it under the Older American Act, as amended, and under State of Tennessee, or other federal appropriations, are utilized in accordance with all federal and state laws, rules, policies and procedures contained in or referenced by the State Agency's Program and Policy Manual.

- (2) The AAAD must have written procedures which are approved by the State Agency for complying with all of its functions as required by federal and state laws and regulations, and by these policies. All written policies and procedures must be available for inspection on request at the AAAD.
- (3) The AAAD must insure that officials and employees of all service provider agencies who may come in direct contact with older persons are aware of their responsibility under the Adult Protection Act of 1978 T.C.A. Section 14-25-103 and Section 71-6-110 as listed below

**71-6-103. Rules and regulations --- Reports of abuse or neglect --- Investigation --- Providing protective services --- Consent of adult --- Duties of other agencies. ---**

(a) The commissioner has the discretion to adopt such rules, regulations, procedures, guidelines, or any other expressions of policy necessary to effect the purpose of this part insofar as such action is reasonably calculated to serve the public interest.

(b)(1) Any person, including, but not limited to, a physician, nurse, social worker, department personnel, coroner, medical examiner, alternate care facility employee, or caretaker, having reasonable cause to suspect that an adult has suffered abuse, neglect, or exploitation, shall report or cause reports to be made in accordance with the provisions of this part. Death of the adult does not relieve one of the responsibility for reporting the circumstances surrounding the death. However, unless the report indicates that there are other adults in the same or similar situation and that an investigation and provision of protective services are necessary to prevent their possible abuse, neglect or exploitation, it shall not be necessary for the department to make an investigation of the circumstances surrounding the death; provided, that the appropriate law-enforcement agency is notified.

(2) If a hospital, clinic, school, or any other organization or agency responsible for the care of adults has a specific procedure, approved by the director of the county office of the department, for the protection of adults who are victims of abuse, neglect, or exploitation, any member of its staff whose duty to report under the provisions of this part arises from the performance of the staff member's services as a member of the staff of the organization may, at the staff member's option, fulfill that duty by reporting instead to the person in charge of the organization or the

organization head's designee who shall make the report in accordance with the provisions of this chapter.

(c) An oral or written report shall be made immediately to the department upon knowledge of the occurrence of suspected abuse, neglect, or exploitation of an adult. Any person making such a report shall provide the following information, if known: the name and address of the adult, or of any other person responsible for the adult's care; the age of the adult; the nature and extent of the abuse, neglect, or exploitation, including any evidence of previous abuse, neglect, or exploitation; the identity of the perpetrator, if known; the identity of the complainant, if possible; and any other information that the person believes might be helpful in establishing the cause of abuse, neglect, or exploitation. Each report of known or suspected abuse of an adult involving a sexual offense which is a violation of §§ 39-13-501 --- 39-13-506 which occurs in a facility licensed by the department of mental health and developmental disabilities as defined in § 33-2-402, or any hospital shall also be made to the local law enforcement agency in the jurisdiction where such offense occurred.

**71-6-110. Violation of duty to report.** --- Any person who knowingly fails to make a report required by this chapter commits a Class A misdemeanor. [Acts 1978, ch.899, § 1; T.C.A., § 14-2610; Acts 1986, ch. 630, § 15; T.C.A., § 14-25-110; Acts 1989, ch. 591, § 111.]

## **5-10 NON-DISCRIMINATION POLICIES AND REQUIREMENTS**

Each AAAD will provide assurances that all activities conducted by the AAAD, service providers, or contracting agencies receiving funds under an area plan, comply with all pertinent laws and regulations.

### **5-10-.01 CIVIL RIGHTS**

- (1) In accordance with Title VI of the Civil Rights Act of 1964 (45 CFR, Part 80), "No person in the United States shall, on the grounds of race, color, or national origin, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." See <https://www.law.cornell.edu/cfr/text/45/80.3>
- (2) In accordance with T.C.A. 4-21-302, *et. seq.*, any program participant or potential beneficiary of any program or project funded by the Tennessee Commission on Aging and Disability under the OAA, or other federal projects, who suspects denial

of any services, benefits or financial assistance, on the basis of race, creed, color, sex, age or national origin, or who suspects that such factors affect the quality, quantity, or range of services, benefits or financial assistance extended, shall have the right to file a complaint in accordance with the Tennessee Commission on Aging and Disability and AAAD Title VI of the Civil Rights Act Implementation Plan, and established procedures there under, and to expect a proper investigation of the complaint.

- (3) As required in the State Agency on Aging and Disability, Title VI of the Civil Rights Act Implementation Plan, all recipients of awards, whether AAADs, grantees, sub-grantees, contractors or sub-contractors shall post, in a conspicuous place, notices setting forth the procedure for filing grievances of discriminating practices and shall make available a copy of the procedures to all program participants or potential beneficiaries upon request.

#### **5-10-.02 AFFIRMATIVE ACTION**

- (1) In accordance with Title VII of the Equal Employment Opportunity Act of 1972 (29 CFR, Part 1608 and 45 CFR, Part 70 "It shall be an unlawful employment practice for an employee (public or private) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions or privileges of employment, because of such individual's race, color, religion, sex or national origin."
- (2) Each AAAD shall develop and implement an affirmative action plan, which complies with the regulations and guidelines of the U.S. Equal Employment Opportunity Commission and the requirements of 5 CFR, Part 900, Subpart F, "Standards for a Merit System of Personnel Administration."
- (3) The AAAD must keep in its official files, a current, approved affirmative action plan as a component of its area plan or area plan update. No area plan will be approved for funding without an approved affirmative action plan.

#### **5-10-.03 NON-DISCRIMINATION AGAINST INDIVIDUALS WITH DISABILITIES**

- (1) In accordance with the Rehabilitation Act of 1973, Sections 503 and 504 (45 CFR,

Part 84), "employers and contractors must take affirmative action to provide employment opportunities for individuals with disabilities and are prohibited from discrimination against individuals on the basis of their disability."

- (2) Employers and contractors also must make a reasonable accommodation to the physical and mental limitation of an employee or applicant unless the employer or contractor can demonstrate that such an accommodation would impose an undue hardship on the conduct of the employer or contractor's business.
- (3) AAADs must make assurances that discriminatory practices prohibited by this Act and accompanying regulations are not practiced in any programs funded under the area plan.

#### **5-10-.04 NON-DISCRIMINATION AGAINST VETERANS**

- (1) The Vietnam Era Veterans' Readjustment Assistance Act of 1974 (U.S.C.A. Title 38, Chapter 2012) requires government contractors with federal contracts or subcontracts of \$10,000 or more to take affirmative action "to employ and advance in employment:
  - (a) qualified Vietnam era veterans during the first four years after their discharge; and
  - (b) qualified disabled veterans through their working life if they have 30% or more disability."
- (2) The Vietnam era has been defined as August 5, 1964 through May 31, 1975.
- (3) AAADs should incorporate provisions of this Act, where applicable, into their affirmative action practices and inform contractors and sub-grantees of the requirements.

#### **5-10-.05 AGE DISCRIMINATION**

- (1) In accordance with the Age Discrimination Act of 1975 regulations, (29 CFR, Section 860.1), "No person in the U.S. shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." (U.S.C.A. Title 42 Chapter 2000).

- (2) In accordance with the Age Discrimination in Employment act of 1967, "it shall be unlawful for an employer to refuse to hire or to discharge any individual or otherwise discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's age." (U.S.C.A. Title 29 Chapters 621-634)
- (3) Within the definitions of U.S.C.A. Title 29 Chapter 14, Section 631, these prohibitions outlined in paragraph (2) are limited to individuals who are at least forty (40) years of age but less than seventy (70) years of age.
- (4) In accordance with 45 CFR, 1321.17(c), but subject to the requirements of merit system guidelines of local governments, preference shall be given to persons aged sixty (60) or over for any paid staff positions (full or part-time) within the AAAD or service provider agencies for which such persons qualify.

## AAAD STAFFING

Staff Positions	Responsibilities	Qualifications	Minimum Full-Time Equivalent
<b>Older Americans Act</b>			
Director See Page 5-13	Oversight of AAAD operation; Planning and development of Area Plan; Management and operation of all program and fiscal aspects. Planning, developing and implementation of the area plan; management and operation of daily activities of the AAAD; advocacy	Master's Degree and five year's experience in supervision or management in field of gerontology, aging programs or related field; or Bachelor's Degree in a related field and seven years of related experience may be substituted for the Master's Degree	1 FTE
Fiscal Officer See Page 5-13	Fiscal functions of AAAD; Financial accounting; Budgeting; Technical assistance to service providers and Financial monitoring	Bachelors Degree in Accounting or related degree in an area of financial management and minimum of 2 years experience requiring financial expertise	1 FTE
Quality Assurance See Page 5-13	Contract compliance; Program monitoring/Quality Assurance; technical assistance to service provider	Bachelor's Degree in social work, gerontology, psychology, sociology, counseling, or related field.	1 FTE

<b>Staff Positions</b>	<b>Responsibilities</b>	<b>Qualifications</b>	<b>Minimum Full-Time Equivalent</b>
Management Information Specialist/Database Manager	Manage database; Compile reports; Maintain resource directory; submit SRT; Analyze data	BS Degree, preferably in Computer Science, or other computer-related field with database experience; or 1 year database experience, hardware experience, and/or 5 year's relative experience  Ability to provide help desk support on hardware, software, communications; Ability to develop and conduct training; Oral and written skills; Working knowledge of software packages;	1 FTE
Family Caregiver Coordinator	Disseminate caregiver information; Organize support groups; Maintain records; Compile reports; Oversee caregiver needs assessments; Arrange for caregiver services; Assist with Area Agency functions as assigned by the AAAD Director	Bachelor's Degree in social work or related field, or RN	A designated coordinator, full-time or part-time as deemed necessary
<b>Staff Positions</b>	<b>Responsibilities</b>	<b>Qualifications</b>	<b>Minimum Full-Time Equivalent</b>
Community Resource Specialist	Telephone Information Assistance and Referral; Comprehensive telephone screening; Assist with appointments for in-home assessment visits;	AIRS Certified Community Resource Specialist – Aging, according to AIRS Standards within 1.5 years of employment; Written/Verbal communications skills;	1 – 2 FTE  + additional as deemed necessary



		Minimum of completion of grade 12, preferred at least 2 years college and minimum of 2 years employment in field of social work.	
<b>Staff Positions</b>	<b>Responsibilities</b>	<b>Qualifications</b>	<b>Minimum Full-Time Equivalent</b>
HCBS Coordinator/Options Counselor	In-home assessments; Development and management of Care Plans; Referral and arrange services; Re-assessment	BS Degree in social work, psychology, gerontology, sociology, counseling, nursing, or equivalent degree; or Licensed Practical Nurse/Registered Nurse or BS Degree with minimum of 2 years experience working with older persons and/or adults with disabilities; or Minimum of completion of 2 years of accredited college or university and 2 years' experience in the field of social work or related field	1 FTE Plus additional FTEs as deemed necessary by caseload

<b>SHIP</b>			
SHIP Coordinator	Cooperate with CMS requests to recruit/train volunteers; Maintain current knowledge of Medicare and Medicaid and other health insurance; Telephone counseling to beneficiaries; Compile reports; Communication skills; Work with media; computer skills, ACL/CMS; coordinate statewide counseling and outreach with regional SHIP staff; data analysis	Preferably a Bachelor's Degree and 2 years experience in advocacy or information and assistance. A high school education and 4 years experience in advocacy or information and assistance may be substituted.	1 dedicated FTE
<b>Public Guardianship for the Elderly</b>			
Guardian	Manage Public Guardianship Program	Bachelor's degree in human services or related field or at least two (2) years of successful employment in a field related to public guardianship activities, such as social services, law, financial institutions, and/or health care or other related fields. Within two (2) years from the date of employment as a district public guardian, or assistant district public guardian, he or she shall obtain certification as a registered guardian through the Center for Guardianship Certification and utilize the NGA	1 dedicated FTE + additional as deemed necessary

		Review Course for the national certification exam as preparatory material.	
<b>Other Staff</b>			
Adequate numbers of staff, qualified by education and experience, assigned for the development and administration of the plan and to conduct other required AAAD functions	Based on the needs of the individual AAAD planning and service area	Qualifications will be developed in keeping with responsibilities assigned to the position	Full-time or part-time as deemed necessary