

## SUPPLEMENTAL DOCUMENTS

Please include the following documents as attachments with your Title III application, as required by the Older Americans Act and Southwestern CT Agency on Aging. Applications will be considered incomplete without submission of all required attachments. Any attachments that fail to meet the requirements must be corrected and resubmitted in order for the project to be eligible to receive Title III funds.

### **I. Audit-**

Attach a copy of your agency's audit. Public and private non-profit agencies receiving federal funds must comply with all applicable government audit standards and requirements. Title III funds must be clearly identified in agency-wide audits. An audit report must be submitted with the initial application and subsequent year audits for each funded agency must be sent to SWCAA as soon as available. If the audit includes any audit findings, a letter from management addressing how management is responding to the findings must also be submitted.

If your charitable nonprofit receives money from the federal government and expends more than \$1 million federal dollars in a single fiscal year, the organization is required to have an independent financial audit referred to as a "Single Audit." A State Single Audit is required when expenditures of state financial assistance equal or exceed \$500,000 in the auditee's fiscal year. Federal and State Single Audits must be included with the applicant's submission if they meet the required threshold.

If an applicant does not have audited financial statements, SWCAA will accept financial statements from a Certified Public Accountant with an IRS Form 990. Section 2 CFR Part 200 of the federal regulations limits awards to organizations without audited financial statements to \$25,000.

### **II. Voluntary Contribution Procedure**

Attach a copy of your agency's Voluntary Contributions Procedure. Grantees may not charge fees for services provided with Title III funding. However, grantees are required to offer clients an opportunity to donate to the project. Donations must be confidential, and no person may be denied involvement if s/he chooses not to contribute. All contributions received are to be used to expand the services of the project being funded under the grant. Describe **HOW** you will meet these requirements. Include methods used to notify clients.

### **III. Referral Plan**

Attach a copy of your agency's Referral Plan. Title III grantees are required to help participants gain access to additional assistance. Describe how you will:

- a. assess unmet needs of your clients for additional assistance beyond what your project may provide and
- b. make referrals that will help clients access needed services.

### **IV. Client Grievance Procedure**

Attach a copy of your agency's Client Grievance Procedure. All organizations funded by Title III are required to adopt a grievance procedure which allows clients who feel they have been treated unfairly to appeal to the organization's Board of Directors or equivalent body to hear, on an impartial basis, the nature of the complaint and to respond accordingly.

A copy of each funded organization's grievance procedure and the method by which it will be made known to individuals seeking or currently receiving services shall be on file at the SWCAA office. A written determination shall be given to the complainant together with information stating that if the individual remains dissatisfied, the complaint may be taken to the Agency on Aging.

## **V. Affirmative Action Plan**

SWCAA is firmly committed to the concept of Affirmative Action as expressed by the following policy:

The Southwestern Connecticut Agency on Aging embraces a policy of equal opportunity and affirmative action in all of its operations, especially in the three important areas of employment, the awarding of grants and contracts, and the delivery of services to the elderly.

The Agency on Aging undertakes not only to make all decisions regarding recruiting, hiring, promotion, and provision of services without discrimination on grounds of race, national origin, religion, gender, sexual orientation, marital status, age or physical or mental handicap; it will also make specific efforts affirmatively to identify and overcome the negative effects of prior or current societal discrimination on all of its operations and those of its grantee agencies and contractors.

The Agency's commitment to the principle of affirmative action is manifested through the development and periodic up-grading of an Affirmative Action Plan, which includes specific goals and timetables, actions designed to achieve stated goals, delegation of responsibility, and the continual monitoring of performance by the supervisory staff and the Board of Directors."

### **Applicants are required to submit an Affirmative Action Plan, updated for the Project Year, containing:**

- (1) A policy statement with the signature of the Chairman of the Applicant Agency;
- (2) A grievance procedure relating to affirmative action issues;
- (3) A vendor's statement (*form attached*);
- (4) The name of the Affirmative Action Officer of the Applicant Agency;
- (5) Specific hiring goals and timetables for the Project Year.

## **VI. Subcontracts**

- A. If any subcontracts are planned for the proposed project, provide all of the following information concerning each subcontract:
  - (1) The agency/person with which you will subcontract
  - (2) The purpose of the subcontract
  - (3) The status of the proposed subcontractor organization
    - municipal, private non-profit, private for profit
    - minority business enterprise
  - (4) Qualifications of the proposed subcontractor
  - (5) The role and responsibilities of the applicant agency in administering the subcontract
- B. Attach a letter of understanding and a vendor's statement (*form attached*) for each potential subcontractor.

## **VII. Standard Assurances**

Include one copy of the attached Standard Assurances document with the original signature of official from your agency who is authorized to sign contracts.

# VENDOR'S STATEMENT

## ACKNOWLEDGMENT OF COMPLIANCE WITH AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT

AGENCY NAME \_\_\_\_\_

GRANT PROJECT \_\_\_\_\_

\_\_\_\_\_ is an affirmative action employer, supportive of, and in compliance with all Federal and State legislative mandates in this regard.

\_\_\_\_\_ will not knowingly do business with any contractor, subcontractor or supplier of materials who discriminates against members of any protected class.

\_\_\_\_\_ Signature

\_\_\_\_\_ Title

\_\_\_\_\_ Date

## STANDARD ASSURANCES

The undersigned applicant agency (grant applicant) submits this application for a contract/grant award under Title III of the Older Americans Act, as amended, and understands and agrees that the following provisions are part of the official application and as such become binding upon the conduct of the project subsequent to the award of any funds by the Southwestern Connecticut Agency on Aging.

It is understood and agreed by the undersigned that: 1) funds awarded as a result of this request are to be expended for the purposes set forth herein and in accordance with all applicable laws, regulations, policies and procedures of the Southwestern Connecticut Agency on Aging, the Connecticut State Bureau of Aging, the Administration on Aging and the US Department of Health and Human Services; 2) any changes in the original proposal as approved will be submitted in writing by the applicant and upon notification of approval by the Agency on Aging shall be deemed incorporated into and become a part of this agreement; 3) if funds are awarded, I am authorized to accept the grant and proceed with implementation on October 1; and 4) funds awarded by the Agency on Aging may be terminated at any time for violations of any terms and conditions and requirements of this agreement.

### I. OLDER AMERICANS ACT

The undersigned applicant agency AGREES:

1. That the project will be carried out in accordance with Title III of the Older Americans Act, the program regulations issued thereto, the policies and procedures established by the Agency on Aging, and the terms and conditions of this application as approved by the Agency on Aging in making an award of funds.
2. That where subcontracts are proposed for the operation of one or more components of the proposal and are approved as part of any award of funds under Title III, the applicant agency retains full and complete responsibility for the operation of the project in keeping with the policies and procedures established by the Agency on Aging for the project. The applicant agency will be held accountable by the Agency on Aging for all project expenditures; and will ensure that all expenditures incurred by the subcontracting agency(ies) will be in accordance with the cost policies and procedures established by the Agency on Aging, in keeping with the guidelines of the United States Administration on Aging. Copies of any proposed subcontracts are submitted with this application.
3. To cooperate with the Agency on Aging in its efforts toward developing a comprehensive and coordinated system of services for the elderly by participating in joint planning efforts and other activities mutually agreed upon to meet this goal. All services provided under this award shall be coordinated with other appropriate services in the community and these services shall not constitute an unnecessary duplication of services provided by other sources.
4. To provide for or participate in such training as may be necessary to enable paid and volunteer project personnel to perform more effectively on the project.
5. To actively seek qualified older persons for paid positions on the project and, wherever possible, to make provision for volunteer opportunities for older persons.
6. With the consent of the project participant or his or her representative, to bring to the attention of appropriate officials for follow-up, conditions or circumstances which place the older person, or the household of the older person, in imminent danger. Also, to assist project participants in taking advantage of benefits under other programs, as appropriate.
7. To cooperate and assist in efforts undertaken by the Agency on Aging, the State Bureau on Aging, the United States Administration on Aging, or any other agency or organization duly authorized by any of the preceding, to evaluate the effectiveness, feasibility and costs of the project.

8. To provide the Agency on Aging, in a timely manner, with statistical and other information which the Agency on Aging requires in order to meet its planning, coordination, evaluation, and reporting requirements.
9. To provide each project participant with an opportunity to voluntarily contribute to the cost of the service; to protect the privacy of each participant with respect to his or her contributions; and to establish appropriate procedures to safeguard and account for all such contributions. No person may be denied any service because they will not or cannot contribute to the cost of the service.
10. To maintain such accounts and documents as will serve to permit expeditious determination to be made at any time of the status of funds within the award, including the disposition of all monies received from the Agency on Aging, and the nature and amount of all charges claimed against such funds, and to retain such records for a period of three years after the project period.
11. To identify Title III of the Older Americans Act as the funding source and the Southwestern Connecticut Agency on Aging as the funding agency in all publicity about the program.

**II. CIVIL RIGHTS ACT OF 1964 (AMENDED TO THE CIVIL RIGHTS ACT OF 1991)  
REHABILITATION ACT OF 1973, AS AMENDED  
AGE DISCRIMINATION ACT OF 1975, AS AMENDED**

The undersigned also AGREES THAT it will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d et seq.); Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794); the Age Discrimination Act of 1975, as amended (42 U.S.C. §6101 et seq.); and all requirements imposed by or pursuant to the Regulations of the Department of Health and Human Services (45 CFR Parts 80, 84, and 91) issued pursuant to those titles, to the end that, no person in the United States shall, on the basis of race, color, national origin, handicap, or age be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in admission or access to or treatment or employment under any program or activity for which the Grantee receives Federal financial assistance from Southwestern Connecticut Agency on Aging, Inc., (herein-after called "Grantor"), a recipient of Federal financial assistance from the Department; and HEREBY GIVES ASSURANCE THAT it will immediately take any measures necessary to effectuate this agreement.

If any real property or structure thereon is provided or improved with the aid of Federal financial assistance extended to the Grantee by the Grantor, this assurance shall obligate the Grantee, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits. If any personal property is so provided, this assurance shall obligate the Grantee for the period during which it retains ownership or possession of the property. In all other cases, this assurance shall obligate the Grantee for the period during which the Federal financial assistance is extended to it by the Grantor.

**III. CERTIFICATION REGARDING LOBBYING**

The undersigned certifies, to the best of his or her knowledge and belief, that

1. No Federal appropriated funds have been expended or will be expended, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with any of the following covered Federal actions: the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

2. If any funds other than Federal appropriated funds have been expended or will be expended to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
3. The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U. S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### **IV. CERTIFICATION OF DRUG FREE WORKPLACE**

The undersigned HEREBY AGREES THAT it will comply with the Drug-Free Workplace Act of 1988 in matters relating to providing a drug-free work place. The undersigned contractor will:

1. Publish a statement notifying employees that unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited and specifying actions to be taken against employees for violations of such prohibition;
2. Establish a Drug-Free Awareness Program to inform employees about all of the following:
  - The dangers of drug abuse in the work place,
  - The organization's policy of maintaining a drug-free work place,
  - Any available counseling, rehabilitation and employee assistance programs, and
  - Penalties that may be imposed upon employees for drug abuse violations.
3. Provide that every employee who works on the proposed contract or grant:
  - Will receive a copy of the agency's drug-free policy statement, and
  - Will agree to abide by the terms of the agency's statement as a condition of employment.

#### **V. NON-DISCRIMINATION REGARDING SEXUAL ORIENTATION**

The undersigned AGREES THAT it will not discriminate or permit discrimination against any person or group of persons on the grounds of sexual orientation, in any manner prohibited by the laws of the United States or of the State of Connecticut. The contractor also agrees to the following:

1. Employees are treated when employed without regard to their sexual orientation.
2. A notice stating the above to be posted in conspicuous places available to employees and applicants.
3. To comply with Connecticut General Statutes 46a-56.

#### **VI. NON-DISCRIMINATION AND AFFIRMATIVE ACTION**

The undersigned AGREES it will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, ancestry, sex,

mental retardation, or physical disability, including, but not limited to, blindness, unless it is shown that such a disability prevents the performance of the work involved. The agency also agrees to the following:

1. In all solicitations or advertisements for employees to state "affirmative action-equal opportunity employer".
2. A notice stating the above to be posted in conspicuous places available to employees and applicants.
3. To comply with Connecticut General Statutes 46a-56, 46a-68e, and 46a-68f.

## **VII. AMERICANS WITH DISABILITIES ACT OF 1990**

The undersigned states they are familiar with the terms of this Act and are in compliance with said Act.

## **VIII. UTILIZATION OF SMALL, MINORITY, AND WOMEN'S BUSINESS ENTERPRISES**

The undersigned AGREES to use best efforts consistent with 45C.F.R. 74.160 et seq. (1992) and paragraph 9 of Appendix G; Connecticut General Statutes 13a-95a, 4a-60, 4a-62, 4b-95(b), and 32-9e.

## **IX. OFFER OF GRATUITIES**

By submission of this application, the undersigned certifies that no elected or appointed official or employee of the contracting agency(ies) or the state of Connecticut has or will benefit financially or materially from this procurement. Any contract arising from this procurement may be terminated if it is determined that gratuities of any kind were either offered to or received by any of the aforementioned officials or employees from the grantee, the grantee's agent, or the grantee's employee(s).

## **X. SUSPENSION OR DEBARMENT**

The undersigned certifies that the grantee or any persons (including subcontractors) involved in the administration of Federal and State funds:

1. has not been convicted or had a civil judgment rendered against him/her for commission of fraud or a criminal offense in performing a public transaction or contract (local, state, or federal) or commission of embezzlement, theft forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property;
2. is not presently indicted for or otherwise criminally or civil charged by a governmental entity with commission of any of the above offenses;
3. has not had one or more public transactions terminated for cause or fault; and

Any change in the above status shall be immediately reported to the Agency on Aging.

## **XI. HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT OF 1996**

The undersigned AGREES to be compliant with the Health Insurance Portability and Accountability Act of 1996 (HIPPA), as appropriate.

## **XII. SAFEGUARDING OF CLIENT INFORMATION**

The undersigned AGREES to safeguard the use, publication, and disclosure of information on all applicants for and all clients who receive service under this contract and comply with all applicable federal and state laws concerning confidentiality.

### **XIII. SERVICE STANDARDS**

The undersigned AGREES to operate the project fully in conformance with all applicable Federal, State, and local fire, health, safety and sanitation and other standards prescribed in law and regulations. Where the State or local public jurisdiction requires licensure for the provision of services, agencies providing such services shall be licensed.

### **CERTIFICATION**

**THESE ASSURANCES** are given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Grantee by the Grantor, including installment payments after such date on account of applications for Federal financial assistance which were approved before such date. The Grantee recognizes and agrees that such Federal financial assistance will be extended in reliance on the representations and agreements made in this assurance, and that the Grantor or the United States or both shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Grantee, its successors, transferees, and assignees, and the person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Grantee.

I, the official named below, hereby swear that I am duly authorized legally to bind the contractor/grant recipient to the above described certification. I am fully aware that this certification, executed on the date and in the county below, is made under penalty of perjury under the laws of the State of Connecticut.

**Date:** \_\_\_\_\_

**Organization Name:** \_\_\_\_\_

**Name and Title of Authorized Official:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Signature of Authorized Official**