



December 16, 2019

Mayor Camille S. Hernandez, Board President
Area Agency on Aging of Pasco-Pinellas, Inc.
9549 Koger Boulevard, Gadsden Bldg., Suite 100
St. Petersburg, Florida 33702

Dear Mayor Hernandez:

Enclosed is the Department of Elder Affairs' (DOEA) November 19-20, 2019, Monitoring Report of Area Agency on Aging of Pasco-Pinellas, Inc. (AAAPP) for the calendar year ending December 31, 2018. The report, which reflects observations noted and discussed during the exit conference, formalizes the areas of deficiency and recommendations that must be addressed by AAAPP's management and board.

Monitoring includes tests of compliance with federal and state programs, contracts, and sub-awards. It should be noted that testing was not comprehensive in scope to identify all deficiencies and excluded specific program tests of the following areas: budgeting, targeting, surplus-deficit, co-payments, and the Emergency Home Energy Assistance for the Elderly Program (EHEAP). These areas will be addressed through technical assistance by your contract manager.

Congratulations on your agency's honorable achievement of having no findings for the eleventh consecutive year, an exemplary achievement! We encourage your agency to continue to share its processes and exemplary practices with other Area Agencies through appropriate venues, such as Best Practice Forums and the annual Quality Assurance Summit.

Since this monitoring review of AAAPP did not result in any findings, a written response to your contract manager, Meghan Gregg, will indicate your acceptance of suggestions or non-acceptance, and include alternative solutions. It is necessary to receive AAAPP's written response within 30 business days from the date of this letter.

On behalf of DOEA and the elder Floridians we serve, I want to thank you and your staff for the courtesy extended to DOEA staff during the visit. We look forward to strengthening our shared commitment as we continue to explore ways to make a difference in the lives of Florida's elders, their families, and caregivers.

Sincerely,

Richard Prudom
Secretary

cc: Ann Marie Winter, Executive Director, AAAPP
Gregory Ungru, Deputy Secretary
Carol Carr, Deputy Chief of Staff
Monitoring and Quality Assurance Team Members
Meghan Gregg, Contract Manager

Enclosure

**AREA AGENCY ON AGING OF
PASCO-PINELLAS, INC.
2019 MONITORING REPORT**

**DIVISION OF FINANCIAL AND SUPPORT SERVICES
MONITORING AND QUALITY ASSURANCE UNIT**

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EXECUTIVE SUMMARY

The Department of Elder Affairs (DOEA) conducted a programmatic and fiscal monitoring review of the Area Agency on Aging of Pasco-Pinellas, Inc. (AAAPP), on November 19-20, 2019. DOEA's monitoring was conducted in accordance with common procedures used to monitor federal and state programs, contracts, and subawards. Governing authorities used for the review included Office of Management and Budget (OMB) Circulars, the Code of Federal Regulations (CFR), and other applicable federal and state guidelines. Pursuant to Section 430.0401, Florida Statutes (F.S.), DOEA must submit to the Governor and Legislature an annual report that describes the result of its monitoring activities of the Area Agencies on Aging (AAAs).

AAAPP's Board of Directors (Board) governs the agency and oversees its operations and administration of programs. The agency's programs are both publicly and privately funded and provide an array of supportive services to elder residents in its PSA. AAAPP serves the two-county region of Pasco and Pinellas counties, designated as PSA 5 (see Appendix, page A-6 for a statewide map of PSAs).

Each year, DOEA staff performs an independent review and test of agency information and evidence. As the result of this year's review, staff did not have any findings, and there were no findings in the prior ten years: an outstanding achievement.

Overall, DOEA's monitoring activities revealed that AAAPP is compliant with requirements related to the agency's role as a major subrecipient of federal and state funds. Accordingly, DOEA recommends that AAAPP ensure continued high-quality services to Florida's elders.

INTRODUCTION

Monitoring Scope, Objectives, and Methodology

DOEA's monitoring and review of programmatic, fiscal, and operational activities of AAAPP covered the period from January 1, 2018, through December 31, 2018. Staff reviewed client files randomly selected from the General Revenue (GR) programs, Imminent Risk referrals, Adult Protective Services (APS) referrals, and Client Data Accuracy information for the period of January 1, 2018, through the beginning date of the fieldwork. This monitoring visit also included follow-up testing of prior year findings to verify that effective corrective action was taken.

DOEA's monitoring objectives for the onsite review were to determine whether AAAPP did the following: 1) complied with its contracts and state and federal rules [refer to Appendix, pages A-4 and A-5], 2) adhered to standards of good practice within the industry, and 3) produced outcomes consistent with DOEA's statutory mission and focus.

DOEA's monitoring and review of AAAPP's programs for this reporting period included inquiries of staff, observation of practices, client visits, and an examination of selected records, satisfaction surveys, service providers' documentation, and client case files. The review also focused on several interrelated areas that form the basis for effective internal control systems. The interrelated areas included governance systems, service delivery, subcontractor oversight, resource use, due process/grievance procedures, and data integrity. Additionally, staff examined AAAPP's independent auditor's report and accompanying management letter for compliance with 215.97 F.S., the Florida Single Audit Act, and 2 CFR Part 200, Audits of States, Local Governments, and Non-Profit Organizations.

AAAPP's performance of selected, legislatively mandated outcome measures is reflected for this period. DOEA is accountable for outcome measures at the state level (refer to Appendix, page A-1).

Planning and Service Area Profile

AAAPP's service system includes private and public sector agencies that provide various options to help elders remain independent and in their homes.

A demographic snapshot of PSA 5's population composition and AAAPP's programs under contract with DOEA for serving elders in the region follows:

Population Composition:

<u>Population</u>	<u>Total</u>	<u>Percent of Total</u>
All Ages	1,485,609	100 %
Age 60 and Older	470,557	32 %

Annualized Contract Allocations by Major Programs*:

Older Americans Act (OAA)	\$	7,995,776
Other Federal Programs		718,850
Statewide Community-Based Programs		10,500,732
Medicaid Waiver Programs		1,061,322
Total Funding	\$	20,276,680

**For comparative purposes, programs reflect twelve (12) months of activities; however, contract periods may differ.*

OAA-funded programs

- Title IIIB (Supportive Services)
- Title III-C1 and III-C2 (Congregate and Home-Delivered Meals)
- Title IIID (Health Promotion)
- Title IIIE (National Family Caregiver Support)
- Title VII (Elder Abuse Prevention)

State-funded programs

- Alzheimer's Disease Initiative (ADI)
- Community Care for the Elderly (CCE)
- Home Care for the Elderly (HCE)
- Local Services Program (LSP)

Other federally funded programs

- Nutrition Services Incentive Program (NSIP)
- Emergency Home Energy Assistance for the Elderly Program (EHEAP)
- Serving Health Insurance Needs of Elders (SHINE)
- Medicare Improvements for Patients and Providers Act (MIPPA)

Joint federal- and state-funded programs

- Aging and Disability Resource Center (ADRC)

COMPILATION OF FINDINGS

There were no findings to be reported as a result of desk reviews and staff interviews for this period.

SUGGESTIONS FOR IMPROVEMENT

During the visit, DOEA staff identified opportunities for strengthening AAAPP's procedures and processes as outlined below. These suggestions will not be included in DOEA's report to the Governor and Legislature. The suggestions are a result of instances of noncompliance that are not significant enough to become findings this year but may indicate weaknesses that could become findings if not corrected and require a written response:

1. DOEA suggests AAAPP ensure that meeting minutes of the Board and Advisory Council (AC) are comprehensive, including accurate attendance records (namely excused and unexcused absences, and resignations), and reflect discussion of the input resulting from the community solicitation and discussion of the Area Plan between the two entities.
2. DOEA suggests AAAPP ensure that Information and Referral (I&R) specialists comply with DOEA's contract that states, "Recorded messages on the Helpline's voicemail system must be responded to within the next business day, when possible" and update its Helpline policies (ADRC 101a, II. A. 12. and 102a, II. A.) to be congruent with the contractual requirement.

PSA HIGHLIGHTS

1. With a donation from Well Med Foundation, AAAPP developed Senior Community Health program for Pinellas County in January 2018 to link health care providers and address the social determinants of health and improve health outcomes of seniors. The program later expanded to include a local service provider allowing for expansion of the program to Pasco County and partnerships with additional health systems.
2. The production “Defying Gravity” also premiered in January 2018. This play was directed and produced by the Falls Prevention coalition of Better Living for Seniors, an initiative of AAAPP, and has since gone on to win national awards at the N4A conference and was recognized at the National Council on Aging Webinar.
3. AAAPP and Pinellas County co-hosted an event on Food Insecurity Among Older Adults at the Enoch Davis Center in South St. Petersburg that included key stakeholders – nutrition providers, food banks, community organizers, senior centers, and representatives from funding organizations in Tampa Bay. The event provided a forum to discuss the nutrition waitlist and needs of seniors in Pinellas and bring together social service providers with funders to collaborate on addressing these needs. Subsequent meetings have generated collaborations, additional funding, and new resources for seniors who are food insecure.
4. AAAPP awarded 18 mini grants from other sources to non-profit organizations in Pasco and Pinellas counties during August 2018. Six of the grants were awarded to Pinellas County serving seniors through Better Living for Seniors (BLS) and 12 were awarded to Pasco County serving seniors through Pasco Aging Network. The mini-grants provide an array of supportive services and goods that are not necessarily within the normal service network but are to improve the quality of life for seniors within the PSA, such as the following: education and training, supplies such as canes and magnifying glasses, senior activities fees, home modifications, and other goods and activities that benefit seniors.
5. AAAPP received a grant from the Pinellas Community Foundation to develop and implement psychoeducation groups for caregivers using Facebook Live as the platform to host the sessions.
6. AAAPP began work on the Community Assessment Survey of Older Adults (CASOA). In conjunction with AAAPP, this committee is made up of seven funding partners (Pinellas Community Foundation; Pinellas County Board of County Commissioners; Pasco Board of County Commissioners; Cities of Clearwater, St. Petersburg, New Port Richey, and Dade City; and stakeholders from Department of Health for Pasco and Pinellas counties) and is a national evidence-based survey for older adults to identify their needs that will be used in the 2020 Area Plan to address strategic plan goals.

NOTEWORTHY OBSERVATIONS

DOEA staff visited two meal sites during this monitoring cycle.

1. The first visit occurred on Tuesday, November 19, 2018. DOEA staff's first stop was at the Land O' Lakes Senior Services Center, operated by Pasco County Senior Services. Services are provided Monday through Friday, with meal service at 11:30 a.m. daily. DOEA staff toured the building and visited with the participants.

Due to traveling from a distant area, DOEA staff arrived at approximately 12:10 p.m. At the time of the visit, participants were concluding lunch service. Approximately 15 elders remained at the site upon arrival, and many of them were preparing for departure. This senior center received kitchen equipment as a result of Fixed Capital Outlay funds in 2017. Staff observed the new equipment in the kitchen and found that GA Foods staff is using the kitchen to prepare congregate and home delivered meals in the area. The meal was served in accordance with the scheduled meal on the posted menu. Staff interviewed participants who expressed satisfaction and appreciation for the opportunity to have a hot meal.

2. On Wednesday, staff traveled to Ridgecrest Community Center, operated by Neighborly Care Network. Staff met with Maria Siles, Meal Site Coordinator. Services are provided Monday through Friday with meal service at noon daily. DOEA staff toured the building and visited with the residents of the community.

At the time of the visit, participants had just begun meal service and were enjoying their meal. Many of the members expressed appreciation for the hot meal. Participants also stated that prior to our arrival there had been an activity with the dietitian educating them on how to make a salad when lettuce is not available. The group stated they enjoyed this activity immensely.

Meals at this site are also provided by GA Foods and are delivered pre-plated hot daily. Staff observed the temperature log: the temperatures and times were recorded in accordance with the requirements in the Handbook. The kitchen on site appeared well organized, clean, and free of pests.

APPENDIX

Legislatively Mandated Outcome Measures

The legislatively mandated performance measures are listed below with the established standard of achievement. The following performance results indicate AAA achievement below the standard for one performance measure and requires a performance improvement plan.

#	Outcome Measure	Standard 2017-2018	Performance Results*
1	Percentage of customers who are at imminent risk of nursing home placement who are served with community-based services	90	
2	Percent of APS referrals who are in need of immediate services to prevent further harm who are served within 72 hours	97	100
3	Percentage of elders assessed with high or moderate risk environments who improved their environment score	79.3	71.4
4	Percentage of new service recipients with high-risk nutrition scores whose nutritional status improved	66	
5	Percentage of new service recipients whose Activities of Daily Living (ADL) assessment score has been maintained or improved	65	72
6	Percentage of new service recipients whose Instrumental Activities of Daily Living (IADL) assessment score has been maintained or improved	62.3	72.8
7	Percentage of family and family-assisted caregivers who self-report they are very likely to provide care	89	
8	Percent of caregivers whose ability to continue to provide care is maintained or improved after one year of service intervention (as determined by the caregiver and the assessor)	90	
9	Average time in the CCE Program for Medicaid Waiver probable customers decreases	2.8 mos.	

*assessed results reported in DOEA's Long Range Program Plan (LRPP). Measures that do not reflect performance results are reported at the statewide level and not applied to individual AAAs.

PROGRESS REPORT

The following table summarizes the areas reviewed for this monitoring cycle and corresponding achievement, based on compliance with authoritative guidance and the expectations outlined in the Interpretive Guidelines. Areas not achieved require a formal corrective action plan to be submitted to DOEA's contract manager within 30 days of receipt of the monitoring report.

Organization Governance, Leadership, and Administration	Technical Assistance Needed
Review of Board and AC rosters and meeting minutes indicated an effective governance and oversight structure and mostly compliance with requirements, by-laws, and Articles of Incorporation. However, meeting minutes did not reflect that the AC and community's input was solicited. It is recommended that the Board and AC clearly document members' resignations in meeting minutes, and ensure that Board meeting minutes reflect the input resulting from the community solicitation and the discussion between the Board and AC.	
Legislatively-Mandated Outcome Measures	Performance Improvement Plan Required
Review of CIRTS data indicated the goal was not achieved for one of four outcomes being measured for this cycle (Environmental Score improved), requiring a performance improvement plan.	
APS Referrals	Achieved
Review of five APS high-risk referrals revealed that a recommended service was provided within 72 hours to four clients reported at high risk of abuse, neglect, or exploitation. There were discrepancies about service dates for the fifth client. However, an email from the vendor indicated the original date on the invoice was an error and confirmed the actual service dates.	
Prioritization of Services	Achieved
Review of CIRTS data revealed that screening and assessment scores were mostly congruent, and that a majority (47 percent) of 97 new enrollees this period were high-rank, high-risk, or AL Waiver (exempt) clients, compared to 20 percent of new enrollees who were low-ranked (1s or 2s: rank 3 clients were not counted).	
Grievance and Discrimination Procedures	Achieved
Review of documentation indicated that the AAA and its subcontractors' grievance and complaint procedures continue to improve.	
Client Satisfaction	Achieved
Review of procedures, a sample of surveys, and summarized results, indicated that the AAA and its subcontractors are monitoring customer satisfaction.	
Information and Referral	Technical Assistance Needed
Review of documentation and observation indicated services are supportive to provide access to and delivery of quality information, assistance, and referrals to elders, their caregivers, and families. A review of 22 calls selected from a sample of voicemail logs indicated that five calls were not returned in a timely manner (more than three days), and four calls were not returned. Information provided by the AAA indicated two of the calls were returned to the elder or caregiver and not to the caller. Interviews indicated that some calls are still not being returned within one business day. It is advised that specialists comply with DOEA's contract by returning calls to the Helpline within the next business day when possible, and that policies are amended to be congruent with the contractual requirement.	
Targeting of OAA Services	Deferred
This area of review has been deferred to contract managers to provide technical assistance for this monitoring cycle.	
ADRC Operations	Achieved
Review of documentation and observation indicated compliance with ADRC requirements. Functions and structure were conducive to ensuring access to services for elders and their caregivers through coordination of resources or referrals, using customer-friendly tools that maximize resources, target service needs, and improve the quality of services.	
EHEAP	Deferred
This area of review has been deferred to the EHEAP program manager for this monitoring cycle.	
Nutrition	Achieved

FLORIDA DEPARTMENT OF ELDER AFFAIRS

Review of documentation for four meal sites revealed substantial compliance with requirements that ensure elders receive tools to make healthy meal choices and receive safe, nutritious meals to improve health and prevent chronic disease.	
Background Screening	
Review of documentation confirmed the AAA and providers complied with Level II background screening requirements for direct service providers to ensure the safety of clients, to satisfy privacy and confidentiality requirements, and to assure subsequent arrest notifications are received by the AAA or its providers.	Achieved
Health & Wellness	Achieved
Review of documentation revealed that program activities and functions complied with requirements that focus on providing disease prevention education and health promotion activities to targeted elders.	
Elder Abuse Prevention	Achieved
Review of documentation confirmed that the AAA effectively collaborated with agencies and leveraged community resources to educate elders, caregivers, and professionals in recognizing and preventing elder abuse, neglect, and exploitation in accordance with requirements.	
Respite for Elders Living in Everyday Families (RELIEF)	N/A
This PSA does not have a RELIEF contract.	
Serving Health Insurance Needs of Elders (SHINE)	Achieved
Review of selected documentation confirmed the AAA is effectively managing the program that provides health insurance counseling to elders, in accordance with requirements.	
General Revenue Programs	Achieved
Review of 10 files selected from general revenue (GR) funded programs (CCE, HCE, and ADI) indicated substantial compliance with eligibility requirements for programs that support clients and their caregivers in allowing frail elders to remain in their homes and communities and avoid costly nursing home placement.	
Subcontractor Monitoring & Oversight	Achieved
Review of service cost reports for three selected subcontractors revealed the AAA has required service cost reports to ensure that unit rates are reasonable for the services and are reasonably consistent with actual costs. Subcontractor monitoring reports were thorough and reflective of similar issues noted by DOEA staff. AAAPP staff did an excellent job of following up with Community Aging and Retirement Services (CARES) when irregularities were discovered, including recovery/offset of billing not supported by documentation, ensuring revision of policies and practices (including correctly calculating care plan costs), and quarterly follow-up to verify CARES' implementation/effectiveness of its corrective action plan (CAP).	
Finance and Administration	Achieved
Review of the Chart of Accounts and financial statements indicates that the AAA classifies and categorizes revenues and expenditures by program. Review of accounting policies and procedures and the agency's single audit, in addition to interviews with fiscal staff, indicated that the AAA complied with generally accepted accounting practices. Review of 30 randomly sampled expenditure transactions revealed that expenses were reasonable and allowable under the programs.	
Procurement	Achieved
Review of procurement procedures and actions indicated there were no procurement actions in this PSA that were above the threshold in 2018. General Revenue programs were last bid in February 2017 for services beginning July 2017, and OAA programs were last bid in July 2014 for services beginning January 2015. Renewals for the five subsequent years are based on satisfactory performance evaluations.	
Property	Achieved
Review of property procedures, the inventory list, and observation of selected property items indicated compliance with requirements. Three items purchased in 2018 were located onsite. Three items randomly selected on site were reconciled to the list.	
CIRTS Data Integrity and Accuracy	Achieved
Review of CIRTS policies and procedures and CIRTS report data, compared to prior year data, revealed that none of the 15 reports contained errors in excess of the standard allowable rates for each report. The allowable rates are based on the case load variances of the PSA.	

Major Federal, State, and Contractual Compliance Guidelines

Federal Rules and Regulations

Approximately 60 percent of DOEA's total budget is funded through federal entitlement and discretionary grant programs. In addition to statutory guidelines associated with the receipt of federal funds, DOEA, the AAAs, and service providers are required to comply with certain program and fiscal guidelines prescribed by the funding source. The most prominent of these regulations are identified below:

- Older Americans Act of 1965, as amended
- Services to be directed to older Americans (age 60 or older)
- No requirement of means or income testing for eligibility
- AAAs must submit formal plan for service area
- Prioritization of services must be given to those with the greatest social/economic need

OMB Circulars and Treasury Regulations prescribe applicable federal grant cost principles:

- Single Audit Act Amendments of 1996, OMB Circular A-133 (Title 2 CFR, Part 200): establishes requirements of single audit act for grantees that spend or receive \$500,000 or more (\$750,000 or more, effective January 1, 2015)
- Code of Federal Regulations: 45 CFR, Parts 74 and 92 (Federal Procurement Guidelines), and Title 2 CFR Part 200 and Appendices (formerly OMB Circulars A-87, Cost Principles for State, Local and Indian Tribal Governments; OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments; OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Nonprofit Organizations; and, OMB Circular A-133, Audits of States, Local Governments, and Nonprofit Organizations)

Social Security Act, Section 1915c - Medicaid Waiver Programs allows states to "waive" requirements of the original Medicaid legislation and create waiver programs that provide care in the home and in the community and are an alternative to institutional care.

- Recipient must meet Medicaid guidelines
- Recipient would require institutionalization in the absence of the waiver
- Waiver cost plus other Medicaid services cannot exceed total cost to Medicaid for serving recipient in an appropriate institutional setting

Federal Grant and Cooperative Agreement Act of 1977 (31 U.S.C. 6301-08) provision establishes criteria for whether a transaction is procurement or financial assistance.

Other Federal Requirements

- OMB Standard Form 424-B Assurances (compliance certification with other federal laws)
- Certifications Regarding Debarment/Suspension, Drug-Free Workplace and Lobbying
- Health Insurance Portability and Accountability Act (HIPAA) of 1996
- Civil Rights Act of 1964, as amended
- Low Income Home Energy Assistance Act of 1981

State Rules/Regulations and Contract Requirements

Several state rules and regulations as provided in Florida Statutes apply to programs funded through federal and state appropriations. As federal funds are received by the state, the state's additional statutory requirements are attached to the use and receipt of the funds. State rules and regulations applicable to AAAs and service providers are listed below. DOEA's contract with AAAs embodies federal and state rules by reference and/or through recital of applicable statutes.

Chapter 287, F.S.

- Procurement of Goods and Services
- Supplier Diversity
- Payment of Vendors (7-Day Rule)
- Exclusion of Public Entity Crime Violators

Chapter 409.508, F.S.

- Low Income Energy Assistance Program (and Ch. 73C-26, F.A.C.)

Chapter 415, F.S.

- Reporting of Elder Abuse (72-Hour Rule)

Chapter 427, F.S.

- Transportation Disadvantaged

Section 430.07, F.S.

- Volunteers

Section 430.08, F.S.

- Rulemaking

Sections 430.201-207, F.S.

- Community Care for the Elderly Program (CCE)

Sections 430.501-504, F.S.

- Alzheimer's Disease Initiative (ADI)

Sections 430.601-608, F.S.

- Home Care for the Elderly (HCE)

Section 215.97(3), F.S.

- Florida Single Audit Act

Department of Financial Services

- State Projects Compliance Supplement
- Reference Guide for State Expenditures

Statewide Map of Planning and Service Areas

