



Policy: 14.02

Title **Social Services Block Grant Fiscal Accountability**

Approved by

Clarence H. Carter

Approval Date: 01/29/2021

Effective Date: 02/15/2021

Authority

2 C.F.R. § 200 [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards]

45 CFR 96.70 et seq. [Social Services Block Grants]

Tennessee Department of Finance and Administration - Policy 03

Application

Social Services Block Grant and Adult Protective Services Staff, Contract Staff

Policy Statement

Tennessee Department of Human Services program staff and contracting agencies must act in a fiscally responsible manner at all times.

Reason for Policy

The purpose of this policy is to provide guidelines for staff and agencies that contract with the Social Services Block Grant to provide uniform compliance parameters for recipients related to fiscal accountability.

Policy

A. Contract and Amendments

Providers must comply with all the terms and conditions of their current contract, and any subsequent amendments. All submitted expenditures will be reviewed in accordance with the provider's current, approved budget. Initial budgets for each contract cycle are determined by SSBG and are included in the contracts as Attachment A.

B. Budget Revisions

1. All [Social Services Block Grant \(SSBG\) Budget Revisions](#) (HS-3463) must be submitted to Tennessee Department of Human Services (TDHS) SSBG program staff for review and approval and are not considered effective or complete until written approval from TDHS has been granted.

2. Revisions should be considered carefully prior to submission and contain the length of time for which they are intended to be effective. Monthly invoices should be submitted in accordance with the established budget.
3. No budget, nor the total of all invoices, shall exceed the funding amount provided in the grant contract.

See [Fiscal Accountability Procedures](#)

C. Cost Allocation Plan and Indirect Cost Rate Letter

Cost Allocation Plan

Each provider submitting invoices requesting reimbursement for indirect (administrative) costs must submit a cost allocation plan to their cognizant agency for approval. Copies of the approved cost allocation plan and the approval letter must be provided to TDHS SSBG program staff.

Indirect Cost Rate Letter

1. If the provider requests reimbursement for indirect costs, it must submit an indirect cost rate letter to its cognizant agency for approval. The approved letter must be provided to TDHS SSBG along with the provider's approved cost allocation plan.
2. Any changes in the approved indirect cost rate must have prior approval from the provider's cognizant agency.

D. Cost Allocation

If any of the costs to be reimbursed by SSBG are joint costs involving allocation to more than one program, the costs shall be allocated in accordance with the provider's approved cost allocation plan. If the cost allocation plan does not address any specific joint cost, the provider must document the allocation method they elect to use that is in compliance with Policy 3.

E. Administrative Costs

Administrative costs are limited to nine percent (9%) of the total amount of the grant, reimbursed at the rate of nine percent (9%) of the total amount of year-to-date reimbursement.

F. Allowable and Unallowable Expenses

SSBG will:

1. only reimburse for allowable expenses as defined in [2 CFR 200](#),
2. not reimburse any unallowable expenses as defined in 2 CFR 200, and
3. not reimburse for late fees.

Questioned costs will not be reimbursed and are subject to recovery from subsequent invoices or by other means.

G. Equipment Purchases

In accordance with the SSBG grant contract, providers may purchase necessary equipment for use in the SSBG program and be reimbursed for the expense. Requests must be submitted to TDHS SSBG program staff and approval must be obtained prior to purchase. Examples of qualified purchases can include but are not limited to:

- computers,
- printers,
- tablets,
- smartphones,

- furniture, and
- unusual supplies such as quantities of board games, outdoor patio game equipment, etc.

See [Fiscal Accountability Procedures](#)

H. Specific Assistance to Individuals

1. Specific Assistance (SA) to individuals may be charged to SSBG in accordance with the SSBG grant contract after all community resources have been exhausted. Requests for assistance must be submitted to TDHS SSBG program staff and prior approval must be obtained. Examples of SA can include but are not limited to:
 - emergency utility assistance,
 - emergency grocery assistance,
 - fans for clients who lack air conditioning,
 - cleaning supplies for clients who assist with their own housekeeping, and
 - minimal household items for evicted or relocated clients in emergency situations.
2. Each request for SA can include more than one type of relief.
3. Citizenship or eligible non-citizen status must be verified prior to submitting an SA request. While full-service personal support and adult day services can be provided to clients based on self-declaration of their citizenship or eligible non-citizen status, it cannot be used when monetary payments or tangible benefits are provided. Because SA provides tangible benefits, eligibility must be documented.
4. SA is to be requested after all other community resources have been exhausted. All applications must document efforts to find relief within the community.
5. SA cannot be used on a repeated basis to provide basic needs.

See [Fiscal Accountability Procedures](#)

I. Cases with SA to Individuals Only

1. The contracted Personal Support Service Agencies (PSSAs) are licensed through the Tennessee Department of Mental Health and Substance Abuse Services (TDMHSAS) and provide personal support services to clients referred to them by APS.
2. In some circumstances, Adult Protective Services (APS) will refer individuals to SSBG for SA only – meaning that the provider does not have an active case for the individual, and the client is not expected to need one in the near future. Specific Assistance to Individuals Only (SATIO) cases will not receive full services from the provider unless a new referral requesting such is generated by APS in the future.
3. SATIO cases will constitute one-time assistance, generally emergency in nature. Assistance will be provided as indicated in Section H above.
 - In such cases, the Tenn. Comp. R. & Regs. 0940-05-38-.02 Application of Rules will not apply, as full services are not being requested.
 - Individuals who receive services as SATIO cases are not enrolled under the PSSA and are not established as clients.

- Therefore, neither section 0940-05-38-.09 Service Recipient Record Requirements, nor section 0940-05-38-.10 Service Recipient Rights of the licensing rules apply.
4. Because of the unique relationship between the individual and the PSSAs created by SATIO cases, all individuals who receive SATIO services must sign the [HS-3470 Specific Assistance to Individuals Only](#).
 5. Agencies providing for SATIO cases must do so without negative effects for the customers in their existing caseloads. Agencies are permitted to reschedule existing clients if necessary, as long as the existing clients agree. Agencies may not cancel previously scheduled appointments in order to serve SATIO cases.

J. Pest Control

Pest control in client homes may be charged to SSBG in accordance with the grant contract after all community resources have been exhausted.

If requested, SSBG may also approve the purchase of home goods related to pest control services. See [Fiscal Accountability Procedures](#)

K. Invoices

Each provider will be reimbursed for actual, reasonable, and necessary costs based on its grant budget, not to exceed the maximum liability established in Section C.1 of its contract. Upon progress toward the completion of the contract scope, the provider submits invoices for reimbursement of allowable costs.

L. Travel

Reimbursement for travel, meals, or lodging must follow the [State Comprehensive Travel Regulations](#) and include all required approvals. See [Fiscal Accountability Procedures](#)

M. Fees, Fares, and Contributions

1. The following services may involve the collection of fees, fares, or voluntary contributions.
 - a. Adult day services – Fee
 - b. Transportation – Fare
 - c. Personal Support Services – Contribution
2. All other services are prohibited from collecting fees or contributions.

For adult day services fee collection info, see [14.01 SSBG Eligibility](#).

N. Funding Recognition

All public notices prepared and released by SSBG providers that mention funding sources must reference TDHS. See [Fiscal Accountability Procedures](#)

O. Periodic Fiscal Review

1. TDHS SSBG program staff reviews expenditures reported on the agency's invoices. Invoices are compared with the provider's contract budget to determine liquidation rates and appropriate line-item expenditures. The provider's quarterly expenditure reports are also reviewed to determine that they agree with the monthly invoice amounts and that expenditures appear to be reasonable and properly charged in accordance with the provider's approved cost allocation plan.
2. If the provider's reports indicate problems in overspending, the costs are questioned and then adjusted or otherwise resolved before the end of the contract period's final reimbursement. Providers may request technical assistance with fiscal issues which include bookkeeping systems, cost allocation plans, and fiscal reporting and budgeting.

P. Annual Service Proposal The Annual [HS-3115 SSBG Service Proposal](#) is the first step of both the strategic planning and procurement processes. The proposal is due from providers sixty (60) calendar days prior to the start of each new contract. See [Fiscal Accountability procedures](#)

Supporting Documents [HS-3463 SSBG Budget Revision Form](#)
[Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 C.F.R. § 200](#)
[SSBG Service Goals](#)
[Uniform Definition of Services](#)
[HS-3470 Specific Assistance to Individuals Only](#)
[State Comprehensive Travel Regulations](#)
[14.01 SSBG Eligibility](#)
[HS-3115 SSBG Service Proposal](#)
[Fiscal Accountability procedures](#)

Retention of Records [RDA Summary for Policy 14.02 SSBG Fiscal Accountability](#)

Definitions/Acronyms

Term	Definition/Acronym
Administrative Costs	Costs that benefit the operations of the entire agency, but cannot be identified to specific programs.
Allocation Method	How an organization or agency distributes shared costs between programs.
APS	Adult Protective Services
CFR	Code of Federal Regulations
Cognizant Agency	The government agency responsible for reviewing, negotiating, and approving cost allocation plans or indirect cost proposals.
Indirect Costs	See the definition of Administrative Costs.
PSSA	Personal Support Service Agency
Questioned Costs	Costs that are questioned by the auditor because of an audit finding, as defined by 2 CFR § 200.84 .

SA	Specific Assistance
SATIO	Specific Assistance to Individuals Only
SSBG	Social Services Block Grant
TDHS	Tennessee Department of Human Services
TDMHSAS	Tennessee Department of Mental Health and Substance Abuse Services

SUPERSEDES

Social Services Block Grant (SSBG) Policy and Procedures Manual:

- Customer Self Declaration and Verification Method, Page 6
- Collection of Fees/Fares/Contributions, Page 14, 15 (first (1st two (2) paragraphs)
- Funding Recognition, Page 20
- Fiscal Review, Page 23
- Annual Service Proposal, Page 26
- Unit of Service, Page 32, 37, 42
- Service Delivery Documentation, Page 48 (paragraph two (2))
- Unit Cost Determination, Page 47

APPROVAL HISTORY

Approved by	Approver Title	Approved Date	Effective Date
<i>Clarence H. Carter</i>	<i>Commissioner</i>	<i>01/29/2021</i>	<i>02/15/2021</i>

RECORD OF REVISION

Date	Version	Location of Change	Description/Reason for Change
<i>01/29/2021</i>	<i>02/15/2021</i>	<i>New Document</i>	<i>New Document</i>