

Elder Justice Act Funding

Published: April 3, 2026

Grants to Enhance Adult Protective Services - Frequently Asked Questions

The Administration for Community Living (ACL) has established the “Elder Justice Act—Adult Protective Services funding opportunity in accordance with Section 2042 of subtitle B of title XX of the Social Security Act, otherwise known as the Elder Justice Act (EJA) as authorized and funded through the Consolidated Appropriations Act, 2023, Public Law 117-328. In accordance with these statutes, the purpose of this opportunity is to enhance and improve adult protective services provided by States, the District of Columbia, and the Territories. Funds awarded to States and Territories under this opportunity will provide Adult Protective Services (APS) programs in the States, District of Columbia, and Territories with resources to enhance, improve, and expand the ability of APS to investigate allegations of abuse, neglect, and exploitation.

These frequently asked questions (FAQs) are provided to assist APS programs in better understanding the funding opportunity. These FAQs further elucidate the information contained in the [Federal Register Notice \(FRN\) for this Opportunity](#), published on February 21, 2024. This FAQ pertains only to funds awarded under the Elder Justice Act.

Contents

.....	1
Grants to Enhance Adult Protective Services - Frequently Asked Questions	1
About this Funding	3
Statutory Reference	3
Funding Purpose	3
Who Can Be Served?	3
Covered Maltreatment Types	3
Receiving FUNDING	3
Eligibility	3
Process	4
Letter of Assurance	4
Spend Plan	4
Templates	5
USE OF FUNDING	5
Allowable Use Examples	5
Cost Sharing	7
Guardianship and Aging/Adult Services	7
Shelter	8

Required Operational Plan.....	8
PARTNERING	9
Bi-Furcated APS Programs.....	9
Tribes	9
EQUIPMENT	9
Prior Approvals.....	10
Technology.....	10
Vehicles.....	10
STAFF-RELATED COSTS	11
Conference & Association Fees.....	11
Hazard Pay	11
Services for Clients	11
Other Grants	11
Hiring.....	11
FISCAL MATTERS	12
Administrative Costs	12
CFDA	12
Lobbying.....	12
Cost Sharing	12
Spending Timeframes	12
State and Territory Allotments.....	13
“Supplement, not Supplant”	13
REPORTING REQUIREMENTS	13
Financial Reporting	13
Programmatic Reporting	14
Documentation of Expenses	14
TRAVEL.....	15
TECHNICAL ASSISTANCE.....	15

About this Funding

Statutory Reference

The statutory authority for grants under this program announcement is contained in the Elder Justice Act, section 2042(b) of title XX of the Social Security Act [Pub. L. 74-271] [As Amended Through Pub. L. 115-123, Enacted February 9, 2018] as referenced in the Consolidated Appropriations Act, 2023, Public Law 117-328.

Funding Purpose

Funds expended under this award are to be spent in accordance with EJA Section 2042(b) for Adult Protective Services (APS) programs. Funds awarded under this opportunity will provide APS programs in the states and territories resources to enhance, improve, and expand the ability of APS to investigate allegations of abuse, neglect, and exploitation.

Who Can Be Served?

Because this is funded through the “Elder Justice Act,” are only “elders” eligible to be served?

The funds may be used for any APS client who meets their state’s statutory or regulatory criteria for client eligibility for APS services in the state.

Can funding be used for intervention for adults at risk of abuse, neglect, and exploitation even if they are not a client of APS?

It is well understood that addressing abuse, neglect, and exploitation requires the presence and interaction of primary, secondary, and tertiary prevention strategies. Funding for this opportunity is authorized under EJA Section 2042(b), and this funding may only be used for those APS services and activities authorized by state law or regulations. If the APS program is authorized by state law or regulations to provide prevention services to individuals who are not clients, then this funding may be used to expand that activity.

Is there a citizenship requirement for recipients of goods or services secured with these funds?

No, there is no citizenship requirement for APS clients to receive goods or services paid for with this funding.

Covered Maltreatment Types

These funds may be used for clients experiencing any of the maltreatment types for which the state APS program has authorization for investigation and response.

Receiving FUNDING

Eligibility

Who is eligible?

Per EJA Section 2042(b), eligible entities are the government agencies or units in each state or territory having the legal responsibility for providing adult protective services within that state or territory.

Are tribes eligible to apply?

Section 2042(b) of the EJA, under which these funds are appropriated, specifies funding for 56 states, Washington, D.C., and the territories. Under this funding opportunity, tribes are not eligible to apply. ACL encourages recipient agencies to work collaboratively with their protective services partners to implement this funding, including tribes, state units on aging, local and state ombudsmen, and other partners.

Am I required to be in compliance with the APS Federal Regulation to receive funding?

States are not required to be in compliance with the APS Federal Regulation until May 8, 2028.

Process

The required elements for applying, and details about to whom and how to submit, are outlined in the [Federal Register Notice \(FRN\)](#).

Can the spending plan be included in the Letter of Assurance, or should it be a separate document in the email?

The spending plan and the Letter of Assurance may be combined. One document can be sent with both the letter and the spend plan, or two separate documents. Both should be included in the same email upon submission of the application.

Will I receive confirmation receipt of the submission email?

Yes, ACL will confirm receipt of application materials via email.

Letter of Assurance

Who can sign the Letter of Assurance?

The Letter of Assurance should be signed by the APS agency's Authorized Official Representative (AOR). Different states have different policies on who the AOR is; in some cases, the AOR is the Department Secretary or Commissioner, the office director, or a project director. The person signing the Letter of Assurance will be attesting that they are the AOR and have the authority to accept the funds on behalf of the state APS program.

Spend Plan

Is an Spend Plan required?

Yes, an Initial Spend Plan is required with the submission of the Letter of Assurance, and prior to awards for each new budget period through the end of the project period. The Initial Spend Plan should outline how the State/Territory intends to spend their fiscal year allotment in response to the needs and challenges to their APS program. The plan should be consistent with the purpose of the authorizing legislation and the description and examples outlined above.

Will the Initial Spend Plan need to account for every dollar allocated?

Yes, all the money in the award must be accounted for in the Initial Spend Plan. However, it might help to consider this as similar to a budget for a discretionary grant, with attention given to broad categories or activities. The initial spend plan is considered preliminary, and relatively brief at only three to five pages. The

initial spend plan can be viewed as a budget planning tool. ACL expects budget allocations to shift as states move from initial planning to implementation.

Our state has a county-run APS system, and we plan to distribute some of the funds using a formula to the counties who conduct investigations and arrange for services. Should our spending plan describe our distribution to formula for counties?

Yes, if funding will be distributed to counties or local APS programs using a formula, that formula should be included in the spend plan.

If our state wants to use EJA funds for projects initially funded with ARPA funds, what is the process?

The EJA spend plan will need to include the projects to be funded with EJA funds. If a project is funded partially by EJA funding and partially by ARPA, each spend plan should indicate which part of the project will be funded by that grant.

Can states use EJA funding to pay for contracts that were entered into for ARPA funding?

States can use EJA funding to pay for costs that were originally allocated to ARPA funding, and the spend plan should be revised to reflect these changes. However, states should consult with their fiscal, budget, and/or acquisitions offices to confirm such changes are allowable under their state's accounting practices.

Templates

There are no templates that should be used or followed. The "Letter of Assurance" should be on agency letterhead, and include the list of required assurances outlined in the Federal Register Notice ([FRN](#)). By signing the letter, the state is attesting to (or assuring) ACL that it will implement the funds as outlined in the [FRN](#).

The "Initial Spend Plan" and any future "Spend Plan" can consist of a narrative, a table, or both, and should indicate how the state is envisioning using the funds. Formatting requirements are identified in the [FRN](#).

USE OF FUNDING

Allowable Use Examples

Funds awarded under this opportunity will provide APS programs in the states and territories with resources to enhance, improve, and expand the ability of APS to investigate allegations of abuse, neglect, and exploitation. These examples are for consideration only, and do not replace existing fiscal requirements:

- Costs and salaries for hiring permanent or temporary staff members, extended hours/over-time for current staff, and associated personnel costs. For more information on these and other indirect costs, see [2 CFR 200.414](#).
- Costs associated with providing goods and services to APS clients.
- Costs associated with community outreach, including public awareness campaigns and other resources designed to increase the public's awareness and understanding of APS' role in the community.
- Training costs, including state-wide training conferences for APS staff.
- Acquiring personal protection equipment and supplies.

- Improving and enhancing technology systems, including supporting remote work, such as the purchase of communications and technology hardware, software, or infrastructure in order to provide adult protective services.
- Improving data collection and reporting at the case worker, local-, and State-levels in a manner that is consistent with the National Adult Maltreatment Reporting System (NAMRS).
- Improving or enhancing existing APS processes for receiving reports, conducting intakes and investigations, planning/providing for services, making case determinations, documenting and closing cases, and continuous quality improvement.
- Working with tribal adult protective services efforts, such as conducting demonstrations on State-Tribal APS partnerships to better serve tribal elders who experience abuse, neglect, and exploitation, partnering with Tribes within the State to include tribal elder abuse data in the State's NAMRS reporting, and undertaking demonstrations to better understand elder abuse experienced by tribal individuals living in non-tribal communities and served by State APS programs.
- Establishing or enhancing the availability for elder shelters and other emergency, short-term housing and accompanying "wrap-around" services for APS clients.
- Establishing, expanding, or enhancing state-wide and local-level elder justice networks for the purpose of removing bureaucratic obstacles and improving coordination across the many State and local agencies interacting with APS clients who have experienced abuse, neglect, or exploitation.
- Costs associated with establishing new or improving existing processes for responding to alleged scams and frauds.
- Costs associated with assisting APS clients secure the least restrictive option for emergency or alternative housing, and with obtaining, providing, or coordinating with care transitions as appropriate.
- Costs associated with transporting APS clients to necessary appointments, such as medical visits.
- Costs associated with establishing grants or contracts to address gaps in the APS program identified in the environmental scan previously completed.

May funds be used for state-level initiatives?

Yes. As the federal grantee of these funds, the state-level APS program has the flexibility to decide how to use or distribute the funds from this grant, provided activities are consistent with the purpose of this opportunity and state law and regulations. Funds may be retained and used at the state level, distributed to local APS programs, contracted out, or any combination of the above.

May funds be used to continue or expand initiatives begun with funds from ARPA?

Yes. Expanding or enhancing activities begun with funds from ARPA is allowable, subject to the other guidance in this FAQ.

Are "swag" and promotional materials allowable expenses with this funding? For example, can I purchase pens, magnets, notepads, buttons, or other items that promote the APS agency or programs?

No, per [2 CFR 200.421](#) costs of promotional items are an unallowable expense. If a grant recipient would like a determination on a specific item, the grant recipient can email their ACL grants/fiscal specialist (please "cc:" the project officer) requesting a determination on whether the cost is allowable.

Are uniforms allowable expenses with this funding?

No, uniforms are not allowable use of this funding because they are not consistent with the purposes of this funding.

Are grantees allowed to purchase gift cards for clients with this funding?

Yes, grantees may purchase gift cards for clients if the grantee's existing, internal fiscal policies allow it. Grantees must refer back to their internal fiscal policies to determine if the purchase of gift cards is allowable for their organization, and if so, how their organizational policies handle the cost of gift card fees, consistent with [2 CFR 200.302](#). If the grantee's internal fiscal policies allow for the purchase of gift cards, the gift cards must be distributed by the end of the project period.

Cost Sharing

Recipients under this funding opportunity must treat this grant as completely separate and distinct from any other federal grant. Funds awarded under one federal grant may not be used to cover expenses or activities under another grant. Federal funds cannot be used to meet cost sharing requirements for other federal awards, unless the program's Federal authorizing statute specifically provides that Federal funds made available for the program can be applied to cost sharing requirements of other Federal programs ([2 CFR 200.306\(b\)\(5\)](#)).

Guardianship and Aging/Adult Services

Can this funding be used to pay for APS to serve as, or arrange for, a guardian?

In Section 2011(2)(D) of the EJA, the definition of APS includes the following: "providing, arranging for, or facilitating the provision of medical, **social service**, economic, **legal**, housing, law enforcement, or **other protective**, emergency, or support services" (emphasis added). ACL urges careful consideration of all supported decision-making options that are less restrictive than guardianship. If every other option that is less restrictive than guardianship has been thoroughly explored and no other option is viable to support the decision-making capability of an APS client, that assessment has been documented, and state law and regulations permit the APS agency to serve as or to pay for a guardian for an APS client, then under those circumstances, it may be permissible to use funds authorized under this funding opportunity.

However, the Older Americans Act, the EJA, and ACL place clear emphasis on the right to autonomy, independence, and self-direction of older adults and adults with disabilities and directs entities to seek less restrictive alternatives than guardianship/conservatorship. ACL also notes the possible conflicts of interest that arise when an APS agency provides guardianship or other fiduciary or surrogate decision-making services for clients, while also being the statutory entity responsible for receiving reports of adult maltreatment, even of guardians. ACL encourages grantees to carefully consider these factors in tandem with state law, regulations, and policy in determining whether it is appropriate to use this funding for APS to serve as a guardian of last resort, or to pay for a guardian for an APS client.

[Can these funds be used to help individuals who are served in other Adult/Aging Services programs? For example, Adult Services is the guardian of an individual, and the APS program wishes to use funds to assist that person with services and supports that maximize independence.](#)

Costs for, and associated with, providing goods and services to APS clients, including assisting APS clients secure the least restrictive option for decision-making and emergency or alternative housing, are permissible provided they are reasonable, allocable, and allowable. The funds may also be used by APS to seek lesser

restrictive alternatives to guardianship or limits on guardianship whenever appropriate. In the scenario presented, if the individual is also a client of APS, the example use of funds would be allowable. However, in all cases, ACL refers grantees back to their state laws, regulations, and written policies to determine if the person is eligible for or meets the threshold criteria for APS services.

[Can these funds be used to provide support to the people that operate family type homes for dependent adults? These are people who apply and receive an operating certificate from our agency to care for up to four adults in their home who require some level of guidance or supervision with ADLs. The residents cannot require a nursing home level of care and must be able to ambulate, feed themselves, etc.](#)

Costs for, and associated with, providing goods and services to APS clients, including assisting APS clients secure the least restrictive option for emergency or alternative housing, are permissible provided they are reasonable, allocable, and allowable. In the scenario presented, if the individual resident is also a client of APS, the example use of funds may be allowable, but only if other sources of funding are not available. Generally, Supplemental Security Income or other funding resources pay for this type of housing setting. Paying owners or operators of these types of housing without an APS connection to clients who may be residents is not allowable. However, in all cases, ACL refers grantees back to their state laws, regulations, and written policies to determine if the person is eligible for or meets the threshold criteria for APS services.

Shelter

[Can these funds be used to pay for emergency shelter or other housing?](#)

Yes, this is covered in the examples of allowable uses in the [FRN](#), as are costs for and associated with assisting APS clients in securing the least restrictive option for emergency or alternative housing.

[Can the funds be used to develop or enhance shelters for victims of abuse and neglect?](#)

Costs for, and associated with, providing goods and services to APS clients impacted by the COVID-19 pandemic, as well as costs for, and associated with, assisting APS clients in securing the least restrictive option for emergency or alternative housing, are permissible provided they are reasonable, allocable, and allowable.

Required Operational Plan

To receive this funding, APS programs must agree and assure that they will provide within 180 days of award an updated operational plan that covers activities through 2028. This plan will outline how they will use these funds to improve and enhance their APS system at the state and local level. The intent is for states and territories to plan how best to deploy and invest the funds made available under the Elder Justice Act, as well as other resources. The plans are intended to be a practical guide to making investments in APS programs and systems, and not simply a vision statement. These plans should use the award amounts under this [FRN](#) for planning the out-years. However, these plans should also prioritize activities and investments in the event the actual funding is different from planned funding. APS programs must set aside a reasonable portion of funds to prepare the operational plan.

[Are county-administered APS programs required to submit an operational plan for each county?](#)

No, the requirement is for a state plan. States have discretion as to how they create and develop their plan. ACL will focus on the operational plan product that includes the three to five years of activities.

When am I required to update the Operational Plan?

All states should have submitted an updated operational plan within 180 days of award that covers activities through 2028 per the [FRN](#). Operational plans outline how states plan to improve and enhance their APS system at the state and local level. Therefore, current operational plans should be updated when new projects are identified and an investment is planned.

PARTNERING

ACL encourages recipient agencies to work collaboratively with their protective services partners to implement this funding, as well as with their State Units on Aging, local and state Long-Term Care Ombudsmen, tribes, and other partners. Award recipients may allocate or distribute a portion of their funding to other state, local, or tribal agencies, provided the activities to be carried out by the partners are reasonable, allocable, and allowable under the authorization and purpose of this opportunity.

Bi-Furcated APS Programs

As the funding allotments are based upon the percentage of older adults in a state (per EJA Section 2042(b)), in a state where elder protective services are separate from adult protective services, ACL will provide the funds to the agency or unit of state government providing protective services to elders. In these states, the elder protective services agency must submit the “Letter of Assurance” and spend plan. ACL encourages recipient agencies in these states to work collaboratively with their adult protective services partners to implement this funding, as well as with their State Units on Aging, local and state Long-Term Care Ombudsmen, tribes, and other partners.

Tribes

In the [FRN](#), ACL specifically identified working with tribal adult protective services efforts as an allowable use of funding. In addition, ACL encourages recipient agencies to work collaboratively with their protective services partners to implement this funding, including tribes, State Units on Aging, and local and state Long-Term Care Ombudsmen. Examples of activities include: conducting demonstrations on state-tribal APS partnerships to better serve tribal elders who experience abuse, neglect, and exploitation; partnering with tribes within the state to include tribal elder abuse data in the state's National Adult Maltreatment Reporting System (NAMRS) reporting; and undertaking demonstrations to better understand elder abuse experienced by tribal individuals living in non-tribal communities and served by state APS programs.

If one agency is awarded this funding, can that agency share or allocate to other agencies for APS needs?

ACL encourages recipient agencies to work collaboratively with their protective services partners to implement this funding, as well as with their State Units on Aging, local and state ombudsmen, tribes, and other partners.

EQUIPMENT

Per [2 CFR 200.439\(b\)\(2\)](#) equipment purchases exceeding \$10,000 must receive prior approval from ACL prior to purchase. Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-federal entity for financial statement purposes, or \$10,000.

Purchases of \$10,000 or more made by sub-grantees also must receive prior approval before the sub-grantee incurs the expense. The sub-grantee must submit the prior-approval request to the grantee APS entity. If

the grantee APS entity approves the prior-approval request, the grantee APS entity must then submit the request to ACL for final review and approval. ACL does not provide prior approval directly to sub-grantees.

Prior Approvals

Prior to incurring the expense of an equipment purchase that is subject to prior approval, the following information must be provided to ACL for review:

1. Identification of and cost for purchase
2. Purpose and intended use of the purchase and how the purchase will benefit the program
3. Market research done, to include:
 - at least three options for equipment/acquisition
 - how this information was obtained (ex: solicited bids, other research)
 - assessment of lease versus purchase options
4. Adheres to the “Buy American” requirement

The equipment may not be purchased until written approval is received from ACL. ACL will review and respond to the prior approval request within five business days. Once prior approval is received from ACL, the organization then follows its own procurement policies.

[If we're planning an equipment purchase, do we need to request that before we submit the spending plan?](#)

Prior approval to purchase equipment must be secured before the grantee encumbers the property. Prior approval is not needed to propose an equipment purchase in the initial spend plan.

Technology

The Elder Justice Act Grants to Enhance Adult Protective Services are intended to enhance, improve, and expand the ability of APS to investigate allegations of abuse, neglect, and exploitation and to respond to the needs of adults experiencing such abuse, neglect, and exploitation. Examples of a technology or data system improvement that would be consistent with this purpose include:

- allowing for secure remote work;
- enhancing APS workers' ability to interview and investigate;
- enhancing interoperability and communication of systems across locales, including across states, and reporting to the National Adult Maltreatment Reporting System (NAMRS); or
- establishing new or improving existing processes for receiving and/or responding to reports.

[Can we use these funds to purchase equipment to enable safe remote work?](#)

Purchasing equipment such as standing desks and other ergonomic supports to enable a safe and ergonomic work environment is permissible, given the expenditures are reasonable and allocable.

Vehicles

These funds may be used for vehicles for use by APS investigators if the purchase or lease of the vehicle is consistent with the purpose of this funding, and is reasonable, allocable, and allowable. If the vehicle cost is greater than \$10,000, prior approval from ACL is required.

STAFF-RELATED COSTS

Conference & Association Fees

As administrative costs are permissible, provided they are reasonable, allocable, and allowable, funds may be used to pay for conference attendance, or for membership in professional associations. To be allowable, grantees must demonstrate the information/training obtained at the conference, or the membership, is consistent with the purpose of this funding to enhance or improve APS response. Please note that the cost of membership in organizations whose primary purpose is lobbying is not allowable (see [2 CFR 200.454](#) and [2 CFR 200.450](#)).

Funds may also be used for travel, lodging, and per diem associated with attending the conference. If the APS program hosts a conference where APS programs from other states may attend, the hosting state should pay only for their staff's conference travel and attendance.

Hazard Pay

This funding may be used to pay for bonuses or hazard pay for APS staff, provided the expenditure is reasonable, allocable, and allowable. When implementing hazard pay or bonuses, a written policy and procedures should be followed (see [2 CFR 200.430](#)).

Services for Clients

These funds may be used to pay costs for, and associated with, providing goods and services to APS clients, including homecare.

Other Grants

Recipients under this funding opportunity must treat this grant as completely separate and distinct from any other federal grant. Funds awarded under one federal grant may not be used to cover expenses or activities under another grant. Federal funds cannot be used as to meet the cost sharing requirements for other federal funds unless there is specific statutory authority to do so (see [2 CFR 200.306\(b\)\(5\)](#)). Funding made available through this opportunity may not be used to replace existing state, territory, or local funding already appropriated for APS programs and services. Existing funds for an existing project or activity may not be displaced by federal funds and reallocated for other organizational expenses. The funding through this opportunity must add to the state or territory's current funding levels and not be used to replace existing funding.

Hiring

[Can the funds be used to hire additional staff?](#)

Yes, these funds can be used to hire additional permanent or temporary staff. The funding through this opportunity must add to the state or territory's current funding levels and not be used to replace existing funding.

[For "temporary staff", can APS programs contract with agencies who provide case aid services?](#)

Yes, APS programs can contract with agencies who provide case aid services to hire additional temporary staff.

Can the funds be used to fill essential positions? I have positions that were defunded by the state legislature, but I continue to have the positions as unfilled FTEs.

Per the “supplement, not supplant” provision in the authorizing legislation, funding through this opportunity must add to the state or territory’s current funding levels and may not be used to replace other existing funding.

Can the funding be used to hire an APS training coordinator?

Yes, funding can be used to hire an APS training coordinator. However, please note that these funds are time-limited, and the expenditure must be reasonable, allocable, and allowable. Please also note the question directly above this one on essential positions.

Can we use these funds for costs associated with promoting self-care among APS staff to sustain a qualified workforce?

Costs associated with promoting self-care among APS employees, such as programming and materials related to wellness, are allowable, provided they are reasonable and allocable.

FISCAL MATTERS

Administrative Costs

The EJA does not restrict administrative or indirect costs. Funds expended for administrative or indirect costs must be reasonable, allocable, and allowable. For more information on these and other indirect costs, see [2 CFR 200.414](#).

CFDA

The CFDA number for this opportunity is 93.698.

Lobbying

Federal funds cannot be used for lobbying (see [2 CFR 200.454](#) and [2 CFR 200.450](#)). Education and technical assistance, consisting of requests to provide impartial information and assessments, is not lobbying. Drafting legislation and advocating for passage of legislation is lobbying.

Cost Sharing

ACL is not requiring matching funds for these grants.

Spending Timeframes

How long do we have to use the funds?

The project period for these awards is anticipated to be 24 months. Grant activities must be completed within the project period timeframe (i.e., funds must be spent, obligated and/or have expenses incurred against them), unless the recipient applies for a no-cost extension.

Can these funds cover expenses incurred after the date of enactment of the legislation but before the Notice of Award date?

These funds are available to grantees for the timeframe that will be indicated on the Notice of Award.

Are there certain timeframes within the 24-month funding period by which funds need to be "encumbered" or targeted for use?

Per [2 CFR 200.403](#) allowable costs must be incurred and obligated to the grant for activities during the approved budget period. Funds must be liquidated, and a final report must be submitted 120 days after the project period end date. There are no other "draw down" or "commitment" milestones by which states must expend a percentage of their funds.

State and Territory Allotments

ACL will distribute funds to states and territories as required by the population-based formula prescribed in EJA Section 2042(b). That is, each state and territory shall be allocated a proportionate share of the total funding available from the appropriation based on the number of elders (age 60+) in each state or territory. The EJA also establishes a "minimum allotment." No state shall receive less than 0.75% of the total appropriation, and no territory shall receive less than 0.10% of the total appropriation. The amount of funds allocated for each of the 56 state or territory-level APS programs is posted on [ACL.gov](#).

Will American Samoa, the Commonwealth of the Northern Mariana Islands, the District of Columbia, Guam, Puerto Rico, and the US Virgin Islands be treated as States or territories for purposes of the funding formula?

The distribution of these funds is made in accordance with Section 2042(b) of the EJA, which provides for minimum allotments to "50 States and 6 territories." Therefore, American Samoa, the Commonwealth of the Northern Mariana Islands, the District of Columbia, Guam, Puerto Rico, and the US Virgin Islands will be treated as territories for purposes of this funding opportunity.

"Supplement, not Supplant"

The phrase "supplement and not supplant existing funding" means that the funding made available through this opportunity may not be used to replace existing state, territory, or local funding already appropriated for APS programs and services. Funds already allocated to APS for an existing project or activity may not be displaced by federal funds and reallocated for other organizational expenses. The funding received through this opportunity must add to the state or territory's current funding levels and may not be used to replace existing funding.

APS programs may reallocate which funds are spent on which activities, for example, choosing to reallocate more state funds to staffing and using federal funds for services, so long as the overall level of funding for APS provided by the state or territory is not reduced.

REPORTING REQUIREMENTS

Financial Reporting

Grantees are required to submit a SF-425 Federal Financial Report (FFR) on an annual basis within 90 days after each reporting period. A final FFR is due within 120 days after the project period end date. FFR due dates can be found in the Notice of Award (NOA).

Submitting Financial Reports

SF-425 forms shall be submitted using the HHS Payment Management System (PMS). The PMS website is located at: <https://pms.psc.gov>. Information regarding FFRs can be obtained at <https://pms.psc.gov/grant-recipients/ffr-updates.html>.

Are fiscal reports still required until the grant end date if we run out of funding?

The reporting requirements are set by the length of the project period. Even if funding is completely expended before the end of the project period, grantees are still required to adhere to the reporting requirements. In this case, the reports would indicate \$0.

Should we include an SF-424 form and an SF-424A form with the spend plan?

An SF-424 form and an SF-424A form are not required and do not need to be included. An SF-425 form is required annually once the Notice of Award is issued.

Programmatic Reporting

Grantees may use the [Current Guidelines for Preparing Performance Reports for Grants \(PDF, 332KB\)](#). Programmatic reports are due annually starting twelve months from the date of the Notice of Award. A final report will be due 90 days after the projected project end date.

Submitting Programmatic Reports

Grantees will upload their annual programmatic report as an attachment under “Resources” in NAMRS. All grantee agencies should already have access to NAMRS. If additional assistance is needed to access NAMRS to submit programmatic reports, please contact the APS Technical Assistance Resource Center at: <https://apstarc.acl.gov/>. If NAMRS is unavailable to submit the annual programmatic report, please email the programmatic report to the Project Officer.

Do we need to update our ACL project officer if our spend plan changes over the course of the grant?

The recipient or subrecipient must report deviations from the approved budget, project or program scope, or objective(s) in accordance with [2 CFR 200.308](#). Therefore, the project officer should be updated when the spend plan or planned activities change to ensure that the use of funds remains consistent with the purpose of this grant. This can be done via email.

Are programmatic reports still required until the grant end date if we run out of funding?

The reporting requirements are set by the length of the project period. Even if funding is completely expended before the end of the project period, grantees are still required to adhere to the reporting requirements. In this case, the reports would indicate there were no activities for the covered period.

Documentation of Expenses

What “proof” of expenses will ACL request/require?

ACL does not require proof (financial records and documentation) of expenditures on a regular basis. However, the grantee accounting practices must be consistent with the cost principles outlined in [2 CFR 200.400](#), support the accumulation of costs as required by the principles, and provide for adequate documentation to support costs charged to the federal award that are allocable, allowable, and

reasonable. Additionally, ACL has the authority to request financial documentation when it determines this is necessary. More information on financial record retention and access to records can be found at [2 CFR 200.334](#) and [2 CFR 200.337](#).

[If used for salaries, do we need to track staff hours that are charged to the grant?](#)

ACL is not requesting detailed reporting by staff for salary. Grantees should report overall expenditures for staffing, and financial records should be kept on staff time allocated to the grant.

TRAVEL

Per [2 CFR 200.475](#), travel costs for grantee personnel are allowable, provided they are reasonable and allocable. Reasonable means the costs are consistent with written state-government travel policies, or, if none are available, then with federal government travel per diem rates for transportation, lodging, and meals & incidental expenses (per diem). Allocable means costs are charged for a specific person for specific activities under this specific award.

[Can we pay for travel expenses to temporarily reassign staff between regions of the state where there is a staffing shortage?](#)

Yes, travel expenses are allowable provided they are reasonable and allocable. It is advisable to set a time limit on the duration of the temporary assignment to ensure more money is not being spent on temporary travel than if replacement staff had actively been recruited in the local area.

TECHNICAL ASSISTANCE

ACL is committed to the success of these projects and is prepared to provide technical assistance to all 56 grantees on programmatic, fiscal, and technology issues and questions. APS programs can direct programmatic questions to the Office of Elder Justice and Adult Protective Services via email at aps@acl.hhs.gov.