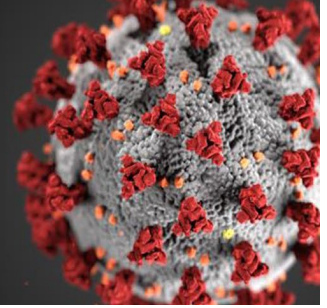




AMERICAN RESCUE PLAN ACT OF 2021 (ARPA): GRANTS TO ENHANCE ADULT PROTECTIVE SERVICES

Frequently Asked Questions

Published: August 22, 2023

The Administration for Community Living (ACL) has established the “American Rescue Plan Act of 2021: Grants to Enhance Adult Protective Services” funding opportunity in accordance with Section 2042(b) 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 American Rescue Plan Act of 2021 (P.L. 117-2). In accordance with these statutes, the purpose of this opportunity is to enhance and improve adult protective services provided by states and local units of government.

These frequently asked questions (FAQs) are provided to assist APS programs in better understanding the new funding opportunity. These FAQs further elucidate the information contained in [the Federal Register Announcement for this Opportunity](#), published on May 28, 2021. This FAQ pertains *only* to funds awarded under the American Rescue Plan Act of 2021, and does not supersede, change, cancel, or nullify guidance provided for awards made under the Coronavirus Response and Relief Supplemental Appropriations Act, 2021.

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ABOUT THIS FUNDING

Statutory Reference

The statutory authority for grants under this program announcement is contained in the Elder Justice Act (EJA), also known as Section 2042(b) of Title XX of the Social Security Act [Public Law 74-271] [As Amended Through P.L. 115-123, Enacted February 9, 2018], as referenced in Section 9301 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Funding Purpose

Funds expended from the American Rescue Plan Act of 2021 (P.L. 117-2) 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.

APPLYING FOR FUNDING

Eligibility

Who is eligible to apply?

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.

Our state APS program does not have its own fiscal infrastructure. Pursuant to state statutes, funding for local APS programs is distributed through a sister agency. The APS program retains administrative oversight of the local APS programs, but fiscal reporting is done through the sister agency's infrastructure. Who would be the applicant in this case?

ACL's legal relationship is with the entity identified on the Notice of Award as receiving the grant funds. Therefore, if fiscal policies within a state require that a financial (or other) office outside of the state APS program receive and distribute the grant funds, then that entity is the one that must submit the Letter of Assurance. In this instance, the Letter of Assurance must clearly state that the funds will be distributed as the state APS program determines and must describe the partnership/relationship so that ACL can be sure that the funds are being used exclusively to support APS and consistently with the purpose of this funding opportunity. The Initial Spend Plan should still be drafted by the APS program office.

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 a 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

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

Yes, all the money in the spend plan 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 two 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 ARPA funds for projects initially funded with CRRSA funds, what is the process?

The ARPA spend plan will need to be revised to include the projects to be funded with ARPA funds. The CRRSA spend plan will also need to be revised to remove these projects, if the project was not funded with any CRRSA funding. If a project is funded partially by CRRSA funding and partially by ARPA, both spend plans should be revised and each plan should indicate which part of the project will be funded by that grant.

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

States can use ARPA funding to pay for costs that were originally allocated to CRRSA 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” can consist of a narrative, a table, or both, and should indicate how the state is envisioning using these 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:

- 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;
- Working with tribal adult protective services, including by 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 members living in non-tribal communities and served by state APS programs;
- 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;
- Improving and supporting remote work in order to provide adult protective services, such as the purchase of communications and technology hardware, software, or infrastructure;
- Improving APS 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);
- Costs incurred by APS associated with establishing new, or improving existing processes for responding to alleged scams and frauds;
- Costs incurred by APS associated with community outreach;
- Costs associated with providing goods and services to APS clients;
- Costs associated with assisting APS clients in securing the least restrictive options for emergency or alternative housing, and with obtaining, providing, or coordinating with care transitions as appropriate. This may include paying for cleaning services or paying back taxes on a property that would otherwise

be condemned or seized, especially in conjunction with financial management and a referral to legal assistance;

- Paying for APS staff extended hours, or hiring of additional, temporary APS staff, and associated APS personnel costs. For more information on these and other indirect costs, see [45CFR75.414](#).
 - Note: this funding is time limited.
- Costs for and related to training (both remote and in-person) for current and new APS employees on conducting investigations, interviews, and documentation, including additional costs associated with advertising, recruiting, certifying, and providing continuing education for APS employees.
- Funds for travel to in-person APS investigations. (For more information on indirect costs, see [45CFR75.414](#).)
- Acquiring personal protection equipment and supplies for APS program use, as appropriate, as well as costs for and associated with COVID-related clean-up/sanitation services for an APS client to return safely to their home environment.

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 the Coronavirus Response and Relief Supplemental Appropriations Act?

Yes. Expanding or enhancing activities begun with funds from the Coronavirus Response and Relief Supplemental Appropriations Act with these funds is allowable, subject to the other guidance in this FAQ.

Federal Funds as Match

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 match for other federal funds unless there is specific statutory authority to do so (45CFR 75.306(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 create a three to five year plan for how they will use these funds to improve and enhance their APS system at the state and local level and submit said plan to ACL within six months of the award date. The intent is for states and territories to plan how best to deploy and invest the funds made available under the American Rescue Plan Act of 2021, 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.

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 45CFR75.320(a)(2), equipment purchases exceeding \$5,000 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 \$5,000.

Purchases of \$5,000 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
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. Efforts to adhere to "Buy American".

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 application.

Technology

The American Rescue Plan Act of 2021: Grants to Enhance Adult Protective Services funding is 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 \$5,000, 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 [45CFR75.454](#) and [45CFR75.450](#)).

Funds may also be used for travel, lodging, and per diem associated with attending the conference. If the APS program is hosting 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 45CFR75.430).

Services for Clients

These funds may be used to pay costs for, and associated with, providing goods and services to APS clients impacted by the COVID-19 pandemic, 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 match for other federal funds unless there is specific statutory authority to do so (see 45CFR75.306(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 for hiring additional staff?

Yes, these funds can be used to hire additional 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. Because this funding comes through a supplemental funding bill and is not considered a part of the annual federal budget, this funding is considered "one-time" funding. That is, grantees should have no expectation that there will be additional, similar funds available in the future. Grantees should plan their activities and hiring with this information in mind.

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 45CFR75.414.

Bucketing of Funds

Under a Major Disaster Declaration, are funds available for “bucketing” like the Older Americans Act funds?

No, the funds are administered under the authority of the EJA, and do not have the same flexibilities as funding under the Older Americans Act.

CFDA

The CFDA number for this opportunity is 93.747.

Lobbying

Federal funds cannot be used for lobbying (see [45CFR75.454](#) and 45CFR75.450). 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.

Match

ACL is not requiring matching funds for these grants.

“One-Time Funding”

Funding for this opportunity is made available through emergency legislation to support Americans during the COVID-19 crisis. Because this funding comes through a supplemental funding bill and is not considered a part of

the annual federal budget, this funding is considered “one-time” funding. That is, grantees should have no expectation that there will be additional, similar funds available in the future. Grantees should plan their activities with this information in mind.

Spending Timeframes

How long do we have to use the funds?

The project period for these awards is anticipated to be 26 months, with a start date of August 1, 2021, and an estimated end date of September 30, 2023. Grant activities must be completed within the project period timeframe (i.e., funds must be spent, obligated and/or have expenses incurred against them) by September 30, 2023, 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 26-month funding period by which funds need to be "encumbered" or targeted for use?

Allowable costs may be obligated to the grant for activities occurring during the project period of the grant. 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 in the [FRN](#).

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 an SF-425 financial report on a semi-annual basis. Reports are due within 30 days for the periods ending September 30 and March 31 (i.e., due October 30 and April 30, respectively), through September 30, 2024. A final PMS drawdown and a final SF-425 report are due within 120 days after September 30, 2024. If a final SF-425 report will be submitted by January 30, 2025, a semi-annual report is not required to be filed for the period ending September 30, 2024. For this opportunity, there will be six SF-425 reports due:

- **April 30, 2022** (August 1, 2021 – March 31, 2022),
- **October 30, 2022** (April 1, 2022 – September 30, 2022),
- **April 30, 2023** (October 1, 2022 – March 31, 2023),
- **October 30, 2023** (April 1, 2023 – September 30, 2023),
- **April 30, 2024** (October 1, 2023 – March 31, 2024), and a
- Final Financial Report **January 30, 2025** (August 1, 2021 – September 30, 2024).

When the second round of ARPA funds were issued in July 2022, they were made as a supplement to the original ARPA funds, which means the FY21 and FY22 ARPA funds have the same grant number and should be reported on together.

On the SF-425 form, lines 10 a. through c. are reported on a quarterly calendar year basis (for the periods ending December 31, March 31, June 30 and September 30) in the HHS Payment Management System (PMS).

Reconciliation of advances and disbursements is required for each quarter and the report must be completed within 30 days of the end of each quarter (i.e., by January 30, April 30, July 30 and October 30, respectively). This reporting requirement is separate from completing the entire SF-425 form as denoted in the financial reporting term.

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>.

Are fiscal reports still required through 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 semi-annually once the Notice of Award is issued.

Programmatic Reporting

Grantees may use the [Current Guidelines for Preparing Performance Reports for Grants \(PDF, 332KB\)](#). ACL has provided [additional guidance](#) to grantees when awards are made. 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.

When the second round of ARPA funds were issued in July 2022, they were made as a supplement to the original ARPA funds, which means the FY21 and FY22 ARPA funds have the same grant number and should be reported on together. For this opportunity, there will be four programmatic reports due:

- **August 31, 2022** (August 1, 2021 – July 31, 2022)
- **August 31, 2023** (August 1, 2022 – July 31, 2023)
- **August 31, 2024** (August 1, 2023 – July 31, 2024)
- **December 31, 2024** (cumulative, August 1, 2021 – September 30, 2024)

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/>.

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

Unlike discretionary grants, changes to the spend plan will not require an "amendment" or prior approval by the ACL project officer. However, 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 through 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 [45CFR75.400](#), 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 [45CFR75.361](#) and [45CFR75.364](#).

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 [45CFR75.474](#), 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 recognizes that a new opportunity like this could seem a lot for a state or territory’s APS program to undertake. 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.