

Iowa Department on Aging
Administrative Monitoring Tool

AAA: Date of Visit:

Reviewed By:

Part I: Policies and Procedures

Section 1: Contracting and Purchasing Procedures

#	Review Question	Yes	No	Comments
				(Identify document used to verify compliance)
1.1	Does the AAA have written procedures for competitive procurement? (45 CFR § 75.327(a))			
1.2	Does the AAA have written procedures for: 1. Procurement by micro-purchase 2. Procurement by small purchase 3. Procurement by sealed bid? (45 CFR § 75.329)			
1.3	Do the procurement procedures include a step for checking the System for Award Management (SAM) database to ensure that contractors are not debarred or suspended? (45 CFR § 75.205 (d))			
1.4	Does the AAA have written standards of conduct covering conflicts of interest? (45 CFR § 75.327(c)(1))			
1.5	Does the AAA maintain a list of current contracts? Are all types of purchases included, even if the AAA does not consider them "contracts?" (45 CFR § 75.327 (i)) (IAC 17-6.11(2))			
1.6	Does the AAA have procedures to maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders that include having a program manager review invoices for accuracy?(45 CFR § 75.327 (b))			

Section 2: Staff Training and Certification Requirements

#	Review Question	Yes	No	Comments
				(Identify document used to verify compliance)
2.1	Does the AAA have procedures for conducting background checks on staff prior to employment? (IAC 17-23.7(1))			
2.2	Does the AAA have procedures/protocol for how to proceed when an applicant is found to have a criminal history or history of abuse? (IAC 17-23.7(1))			
2.3	Does the AAA have procedures to ensure that employees have the required training, background checks, and credentials according to the OAA, Iowa Code, and/or Iowa Administrative Code? (IAC 17-6.3(5))			

Section 3: Coordination and Provision of Services

#	Review Question	Yes	No	Comments
3.1	What does the agency do to coordinate with other local agencies to coordinate services? For example, do they partner with Center for Independent Living, MHDS, and other relevant organizations? This should be a conversation rather than a simple "Yes" or "No." (IC 231.33(17))			
3.2	Does the AAA have an emergency/disaster services plan? (IAC 17-6.9(2))			
3.3	Has the emergency/disaster services plan been used in the past 12 months? If yes, what worked and what needs improved?			
3.4	Does the AAA have a procedures in place for conducting a regular needs assessment? (IC 231.33)			

**Iowa Department on Aging
Administrative Monitoring Tool**

3.5	Does the AAA have procedures in place to get consumer feedback about services the AAA provided? (IAC 17-6.10(10))			
3.6	Does the procedure require active feedback or is it simply a comment box? (Best Practice)			
3.7	Does the AAA have procedures in place to use the consumer feedback it gathers, including issuing a feedback report for each provider within 6 months of the signing of a contract? (IAC 17-6.14(3))			

Section 4: Prioritizing Target Populations

#	Review Question	Yes	No	Comments
4.1	Does the AAA have a policy/procedure for determining who receives services? (IC 231.33) (IAC 17-6.10(9)) If yes, answer the following five questions. If no, skip to 4.2.			
4.1a	Is the policy clear about how determinations are made?			
4.1b	Does the policy prioritize seniors who are socially isolated? (45 CFR §1321.69(a))			
4.1c	Does the policy prioritize seniors with the greatest economic or need? (IC 231.33)			
4.1d	Does the policy prioritize minority seniors? (IC 231.33)			
4.1e	Does the policy prioritize seniors with limited English proficiency? (IC 231.33)			
4.1f	Does the policy prioritize rural seniors? (IC 231.33)			
4.1g	Is the policy published? (IC 231.33)			
4.2	Does the AAA have a policy to ensure that services are sustainable?			
4.3	Does the AAA have policies and/or procedures to ensure that they are covering the entire service area? (IC 231.33 (8))			
4.4	Does the AAA have a policy for collecting voluntary contributions? (OAA Sec. 315 (b))			
4.4a	Are contributions tracked by amount rather than by contributor? (OAA Sec. 315 (b)(1)(C))			
4.4b	Is it clear that contributions are voluntary and noncoercive? (OAA Sec. 315 (b)(1); Sec. 315 (b)(4)(A))			
4.4c	How do AAA staff ensure that contributions are made anonymously? (OAA Sec. 315 (b)(1)(C))			
4.4d	Does the AAA provide the same level of service to consumers regardless of whether or not they voluntarily contribute? (OAA Sec. 315 (b)(1)); (45 CFR §1321.67)			
4.5	Does the AAA have a plan to reach disabled individuals ages 18 to 59? (IC 231.64)			
4.6	Does the AAA have methods for providing multiple modes/points of accessing services to assure that older individuals and their caregivers in the planning and service area have reasonably convenient access to information and assistance services? (IC 231.33 (8))			

Section 5: Board of Directors and Advisory Council

#	Review Question	Yes	No	Comments
5.1	Have there been any major changes to the AAA's bylaws (Board of Directors/Advisory Council) since the last monitoring?			

**Iowa Department on Aging
Administrative Monitoring Tool**

5.2	Do the bylaws include a process for ensuring appropriate member turnover (for example, term limits, process for selecting new members, etc.)? (IAC 16-6.7(7); IC 504.805)			
5.3	Is there a schedule of meetings and is there evidence that those meetings occurred (at least quarterly for Advisory Council)? IAC 17-6.8; IAC 16-6.7(7); IC 504.821)			

Section 6: Parent, Affiliate, and Subsidiary Organizations

#	Review Question	Yes	No	Comments
6.1	Does the AAA have any parent, affiliate, or subsidiary organizations? If no, skip to Section 7. (45 CFR § 75.327(c)(2))			
6.2	Does the AAA have written standards of conduct covering organizational conflicts of interest? Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. (45 CFR § 75.327 (C)(2))			
6.3	Do the organizations maintain separate Boards of Directors with a minority of overlapping members? (Best Practice)			

Section 7: Additional Policies and Procedures

#	Review Question	Yes	No	Comments
7.1	Does the AAA have a policy regarding protecting personal information? (IAC 17-6.10(6))			
7.2	Does the policy include procedures for resolving breaches of data?			
7.3	Have there been any breaches in the past 12 months?			
7.4	Are all staff covered by the policy?			
7.5	Does the AAA have a process for accepting complaints and grievances, including those from individuals who were denied services? (IAC 17-6.10(5))			
7.7	Does the AAA have a process for tracking and resolving complaints and grievances? (IAC 17-6.10(5))			

Part II: Contracts & Procurement Testing

Review the list of contracts. Select a minimum of 3 contracts from the list and request copies of the contracts, RFPs, and of all invoices for the past twelve months. For this tool, do not select the Legal Services Contract. Using the tool below, along with the contracts and invoices, determine whether each contract complies with the AAA's procedures.

CONTRACT #1										
Vendor	Contract Purpose	Start Date	End Date	Date Awarded	Type of Award					

Section	Review Question	Yes	No	Comments/Notes
1	Procurement Requirements			
1a	<i>Was the contract awarded in compliance with the AAA's procedures for awarding contracts? (For example, if RFP was required, was it used?)</i>			
1b	<i>Did the AAA document that it followed its procedures regarding conflicts of interest?</i>			
1c	<i>Did the AAA ensure that the contractor is not debarred?</i>			
2	General Contract Compliance			
2a	<i>Is the contract current?</i>			
2b	<i>Did work begin after the contract was signed? (Verify with invoices)</i>			
2c	<i>Does the contract contain an assurance that the contractor will comply with all current federal, state, and local health, fire, safety, sanitation, accessibility, and licensure requirements? (IAC 17-6.10(12))</i>			
2d	<i>Does the contract contain an assurance that the contract does not restrict the AAA from contracting with other providers of similar services? (IAC 17-6.11(1))</i>			
2e	<i>Does the contract contain an assurance that the service provider will use funds in compliance with federal guidelines? (IAC 17-6.45(5))</i>			

3	Contract Oversight			
3a	<i>Is there evidence that staff performed monitoring in accordance with the agency's procedures?</i>			
3b	<i>Is there evidence that the AAA follows its procedures for reviewing invoices?</i>			

CONTRACT #2										
Vendor	Contract Purpose	Start Date	End Date	Date Awarded	Type of Award					

Section	Review Question	Yes	No	Comments/Notes
1	Procurement Requirements			
1a	<i>Was the contract awarded in compliance with the AAA's procedures for awarding contracts? (For example, if RFP was required, was it used?)</i>			
1b	<i>Did the AAA document that it followed its procedures regarding conflicts of interest?</i>			
1c	<i>Did the AAA ensure that the contractor is not debarred?</i>			
2	General Contract Compliance			
2a	<i>Is the contract current?</i>			
2b	<i>Did work begin after the contract was signed? (Verify with invoices)</i>			
2c	<i>Does the contract contain an assurance that the contractor will comply with all current federal, state, and local health, fire, safety, sanitation, accessibility, and licensure requirements? (IAC 17-6.10(12))</i>			
2d	<i>Does the contract contain an assurance that the contract does not restrict the AAA from contracting with other providers of similar services? (IAC 17-6.11(1))</i>			
2e	<i>Does the contract contain an assurance that the service provider will use funds in compliance with federal guidelines? (IAC 17-6.45(5))</i>			
3	Contract Oversight			
3a	<i>Is there evidence that staff performed monitoring in accordance with the agency's procedures?</i>			
3b	<i>Is there evidence that the AAA follows its procedures for reviewing invoices?</i>			

CONTRACT #3									
Vendor	Contract Purpose	Start Date	End Date	Date Awarded	Type of Award				

Section	Review Question	Yes	No	Comments/Notes
1	Procurement Requirements			
1a	<i>Was the contract awarded in compliance with the AAA's procedures for awarding contracts? (For example, if RFP was required, was it used?)</i>			
1b	<i>Did the AAA document that it followed its procedures regarding conflicts of interest?</i>			
1c	<i>Did the AAA ensure that the contractor is not debarred?</i>			
2	General Contract Compliance			
2a	<i>Is the contract current?</i>			
2b	<i>Did work begin after the contract was signed? (Verify with invoices)</i>			
2c	<i>Does the contract contain an assurance that the contractor will comply with all current federal, state, and local health, fire, safety, sanitation, accessibility, and licensure requirements? (IAC 17-6.10(12))</i>			
2d	<i>Does the contract contain an assurance that the contract does not restrict the AAA from contracting with other providers of similar services? (IAC 17-6.11(1))</i>			
2e	<i>Does the contract contain an assurance that the service provider will use funds in compliance with federal guidelines? (IAC 17-6.14(5))</i>			
3	Contract Oversight			
3a	<i>Is there evidence that staff performed monitoring in accordance with the agency's procedures?</i>			
3b	<i>Is there evidence that the AAA follows its procedures for reviewing invoices?</i>			