



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

Frequently Asked Questions

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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 better understand 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.

An information call for state-level APS programs was held on June 8, 2021. The information in this FAQ includes questions and answers addressed during that call.

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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 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 with 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 the EJA Section 2042(b), and this funding may only be used for those APS services and activities authorized by state law/regulation. If the APS program is authorized by state law/regulation 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 the EJA Section 2042(b), eligible entities are the agency or unit of State government in each state or territory having the legal responsibility for providing adult protective services within the State.

Are Tribes Eligible to apply?

Section 2042(b) of the EJA, under which these funds are appropriated, specifies funding for 56 states, DC, 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, the State Units on Aging, local and State Ombudsmen, and other partners.

Process

Eligible applicants for the American Rescue Plan Act of 2021: Grants to Enhance Adult Protective Services must submit all required materials by **June 28, 2021**. ACL will process the application and estimates issuing Notices of Award with an August 1, 2021 start date. 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 if that is easiest. You can send one document with both the letter and the spend plan, or two separate documents. Please include both in the same email when you submit your application.

Will I receive a confirmation receipt of the submission email?

Yes; ACL will confirm receipt via email of your application materials.

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, or it could be the office director, and in some it is 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?

You will need to account for all the money in the spend plan. However, it might help to consider this as similar to a budget for a discretionary grant. Pay attention to broad categories or activities. The initial spend plan is considered preliminary, and relatively brief at only 2-5 pages. The initial spend plan can be viewed as a budget planning tool. ACL expects things 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 you will distribute funding to counties or local APS programs using a formula, please include that formula in your spend plan.

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 be 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 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 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;

- 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 secure the least restrictive option for emergency or alternative housing, and with obtaining, providing, or coordinating with care transitions as appropriate.
- Paying for APS staff extended hours, or hiring of additional, temporary APS staff, and associated APS personnel costs. For more information on these are 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 once in-person APS investigations resume. (For more information on indirect costs, see [45CFR75.414](#).)
- Acquiring personal protection equipment and supplies for APS program use, as appropriate, once in-person investigations resume, 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/regulation. Funds may be retained and used at the state level, distributed to local APS programs, contracted out, and 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/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 options to support decision-making 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, and that assessment has been documented, and state law/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 the 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 that 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 allowable 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 4 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 allowable 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.

Required Operational Plan

To receive this funding, the APS program must agree and assure that they will create a 3-5 year plan for how they will use these funds to improve and enhance their APS system at the state and local level, and submit it to ACL within 6-months of the award date. The intent is for states/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/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 3 to 5 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 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, 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 is 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 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 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.

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, provide the following information 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 3 options for equipment/acquisition
 - how information was obtained (solicited bids, other research)
 - assessment of lease vs. purchase options
4. Efforts to adhere to “Buy American”.

Do not purchase the equipment until written approval is received from ACL. ACL will review and respond to the prior approval request within five (5) 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. You do not need prior approval to propose an equipment purchase in your 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 are:

- allows for secure remote work;
- enhances APS workers' ability to interview and investigate;
- enhances interoperability and communication of systems across locales, including across states, and reporting to the National Adult Maltreatment Reporting System (NAMRS); or
- establishes new, or improves 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 allowable, given the expenditures are reasonable and allocable.

Vehicles

These funds may be used for vehicles that are used 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 \$5000, prior approval from ACL is required.

STAFF-RELATED COSTS

Conference & Association Fees

As administrative costs are permitted, 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 gained at the conference, or the membership, is consistent with the purpose of this funding to enhance or improve APS response. Please note, that costs of memberships whose primary purpose is lobbying are unallowable costs, please see [45CFR75.454](#) and [45CFR75.450](#) for more information.

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](#) for more information.

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's/territory's current funding levels and not be used to replace 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.

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's/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, you can use funding 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 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 the Older Americans Act funding.

CFDA

The CFDA number for this opportunity is 93.747.

Lobbying

Federal funds cannot be used for lobbying, please see [45CFR75.454](#) and [45CFR75.450](#) for more information. Education and technical assistance, where you are asked to provide impartial information and assessments is not lobbying. Drafting legislations and advocating for passage is lobbying.

Match

ACL is not requiring matching funds for these grants.

“One-Time Funding”

Funding for this opportunity were 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 an estimated 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., spend it, incur an expense against it, and/or obligate it) 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. At this time, it is anticipated the project period start date will be August 1, 2021.

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 the 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. The EJA also establishes a “minimum allotment. No State (50 entities) shall receive less than 0.75% of the total appropriation, and no territory (6 entities) shall receive less than 0.10% of the total appropriation

The amount of funds allocated for each of the 56 state-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 activities may not be displaced by federal funds and reallocated for other organizational expenses. The funding received through this opportunity must add to the state’s/territory’s current funding levels, not be used to replace funding.

REPORTING REQUIREMENTS

Financial Reporting

Grantees are required to submit a [financial report SF-425](#) on a semi-annual basis. Reports are due within 30 days for the periods ending September 30 and March 31 (i.e., due October 31 and April 30), through September 30, 2023. The first SF-425 report should be submitted for 8 months, covering the period from August 1, 2021 to March 31, 2022. A final PMS drawdown and a final SF-425 are due within 120 days after September 30, 2023. If a final SF-425 report will be submitted January 31, 2024, a semi-annual report is not required to be filed for report ending September 30, 2023. For this opportunity, there will be four (4) SF-425 reports due:

- April 30, 2022,
- October 31, 2022,
- April 30, 2023, and a
- Final Financial Report January 31, 2024.

On the SF-425 form, lines 10 a. through c. are reported on a quarterly calendar year basis (for the periods ending 12/31, 3/31, 6/30, 9/30) at 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 1/30, 4/30, 7/30, 10/30). This reporting requirement is separate from completing the entire SF-425 as denoted in the financial reporting term.

Submitting Financial Reports

The SF-425 shall be submitted using the HHS' Payment Management System (PMS). 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 SF424 and SF 424A with the spend plan?

An SF424 and 424A are not required and you do not need to include them. An SF 425 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 will provide additional guidance to grantees when awards are made. Programmatic reports are due annually beginning with 12 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 you need additional assistance accessing NAMRS to submit your programmatic reports, please contact the APS Technical Assistance Resource Center (<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 your ACL project officer. However, your 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 must 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 is determined needed. 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.

TECHNICAL ASSISTANCE

ACL recognizes that a new opportunity like this could seem a lot for a state/territory 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. ACL will provide more information on how that technical assistance will be provided once the awards are made. In the interim, APS programs can direct programmatic questions to the Office of Elder Justice and Adult Protective Services via email at aps@acl.hhs.gov.

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 meaning costs are charged for a specific person for specific activities under this specific award.

For CRRSA, the costs must be related to personnel and to travel as a direct response to the COVID-19 pandemic to be considered allowable.

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

Yes, travel expenses would be allowable provided they are reasonable and allocable. You are advised to set a time limit on the duration of the temporary assignment so you can be sure you are not spending more money on temporary travel than if you actively recruited replacement staff in the local area.

