# Lehigh County Aging & Adult Services Compliance Checklist

Name of Vendor Organization:
Postal Address:
Email Address:
Persons Interviewed:
Fiscal Year of Review:
Date of Review:
The vendor is fully prepared with all reports, files, and other supporting documentation required to complete the "on-site" portion of the Compliance Monitoring.
Initial and Date:
Vendor's Certification Statement:
I certify the information and supporting documentation provided on the Compliance Checklist questions are true and correct to the best of my knowledge; and, that it fairly presents the activities, systems, policies, and procedures of this organization.
Signature of Authorized Organization/Vendor Official Date
Name Printed Title

Compliance Questions	Compliance ?		Notes
	Yes	No	

GENERAL QUESTIONS	ALL VEND	OORS MUST ANSWER BELOW:
1. The vendor has evidence of any specific licensure that qualifies them to perform contract services for the AAA/AS.		List licensing type and licensing authority: Obtain copy.
Please identify specific licensure(s) indicating professional qualifications:		
2. The vendor has evidence of standard procedures for compiling data regarding units of service and clients served which is then submitted to the AAA/AS as an invoice for reimbursement. (How is the invoice prepared?)		Have vendor outline their invoice processing policy.  Note below:
3. The vendor has evidence that an audit is performed annually in accordance with contract requirements.		Get copy of most recent audit report.
4. Are invoices prepared and submitted by the deadlines for submission?		Verify invoices submitted by 10th day of the month, following services:
Do invoices contain all the required information?  If no to either question above, explain why? (explain in detail)		
5. The vendor complies with Insurance Requirements.		Provide copy of insurance coverage and amounts.
6. Does the vendor use contracted dollars from AAA/AS to leverage other funds?		If yes, please list dollars leveraged.
7. The vendor has performance outcome measures specific to the services and programs funded by their contract with Lehigh County.		Provide a copy of performance outcome measures.
8. The vendor has complied (agrees to comply) with AAA/AS policy which provides for appeals and fair hearings as required by PDA, DPW and other funding sources.		
9. The vendor maintains acceptable written documentation to record all complaints; which documents all steps taken to resolve complaints and the response to the recommended resolution by the parties to the complaint.		Review complain resolution process and note. In addition, review selected files for evidence.
The vendor has written evidence located in the employee file of corrective actions regarding family, consumer, and/or AAA/AS complaints regarding vendor employee.		

Compliance Questions	Compl	iance ?	Notes
	Yes	No	
10. The vendor has evidence that they have, and enforce, a written policy that prohibits their employees from accepting gifts from their consumers of service.			Review policy, secure a copy.
11. Vendor has evidence contained in their personnel records that employees of the vendor agency are citizens of the United States of America, or are legal aliens.			Review personnel records for I-9 form.
12. The vendor has evidence contained in their personnel records that a criminal record check has been done with the proper authorities, and reviewed and determined acceptable as a condition of, and prior to hiring and placed in a capacity of service provision, for any consumer of AAA/AS services.			Review personnel records for criminal record checks.
13. Vendor has written procedures for medical emergencies, weather emergencies/disasters, incident reports, and staff coverage?			
14. The vendor further agrees that staff meet the qualifications for employment established by AAA/AS or funding source regulations.  All positions have clear job descriptions and accountabilities.			Explain.
Job descriptions are updated to reflect current duties and assignments.  Annual evaluations are completed on all employees.			
15. The vendor has provisions for a certified or licensed staff as an employee or consultant.			
16. The vendor orients and trains all employees and follows AAA/AS or it's funding sources training guidelines.			
17. Does the vendor's management staff (supervisors, program directors, fiscal officer) meet?  How frequently?			If response is no, please explain.

Compliance Questions	Compl	iance ?	Notes
	Yes	No	
18. A separate file is maintained on each client.  Files consist of a current service plan, intake form (request for service and service needed), documentation of acceptance of client and date of service to begin, documentation of service problems and consumer problems and identifying data (consumer profile).  An individual is determined eligible for a particular service within two working days.			If response is no, please explain.
19. Vendor maintains a signed Release of Information from the client when sharing information with another source.			Review Release of Information and obtain copy.
20. Vendor permit access of files to Federal authorities, the Commonwealth, the Department, the County Commissioners or County Executive or their authorized agents.			
21. Vendor contacts AAA/AS when a client no longer needs a service or level of service or the client's uncooperative behavior or misuse of the service warrants termination.			
22. Vendor maintains records for the required four years for audit/program purposes.			
HUMAN SERVICES DEVELOPMENT FUND			nly if you provide a service funded ervices Development Fund (HSDF)
23. Applicants or clients are not discriminated against on the basis of race, color, religious creed, handicap, ancestry, national origin, age or sex.			
24. Vendor shall maintain documents pertaining to the determination and redetermination of eligibility.			Review redetermination form.
25. Vendor determines each file for eligibility every six months as long as file remains active.			Review redetermination form.
26. Vendors of information and referral service keep a log listing the number of information and referral contacts.			Review log.

Compliance Questions	Compl	iance ?	Notes
	Yes	No	
27. Vendor maintains all files, expenditure reports,			
etc. for five years from the last fiscal year of AAA/AS funding.			
28. All individuals billed under HSDF for AAA/AS are 18 to 59 years of age and a resident of Lehigh County.			Review client files.
29. An individual is determined eligible for a particular service within 15 days.			
30. Family monthly gross income (FMGI) does not exceed 125% of Federal Income Guidelines.			Review client files.
31. Family monthly gross income (FMGI) does not exceed 250% of Federal Income Guidelines for Adult Day Care, Chore, Home Delivered Meals and Homemaker.			Review client files.
32. Information and Referral Services are provided without regard to income.			
33. Vendor has a written waiting list procedure.			Review waiting list procedure.
34. Reductions and terminations by reason of insufficient resources shall be done without discrimination. Clients in life threatening situations will continue to receive services and services considered to be a high priority shall be maintained at the maximum reasonable level.			
35. Vendors meet the requirements listed under Adult Services Service Definitions in which they are being funded.			
36. Vendors listed under "Specialized Services" meet the Adult Services eligibility criteria. Although these criteria may be modified to include different age restrictions, need criteria, or fee scales, they must meet the changes specified in the HSDF Pre-Expenditure Plan.			

Compliance Questions	Compl	iance ?	Notes
	Yes	No	
NUTITION SERVICES	Answ	er below, on	ly if you provide Nutrition Services
37. The vendor has evidence that all hot and cold foods for Congregate or Home Delivered Meals are maintained at temperatures of at least 140 degrees or below 41 degrees from the time the food leaves the preparation site to the time of serving the meal.			
38. The vendor permits the AAA/AS offered nutrition education, socialization, and health promotion programs.			
39. The vendor assures that all eligible meals for USDA Commodity/Cash Support meet RDA requirement established by the Food and Nutrition Board of the National Academy of Science for persons 55 years and older; and are served to eligible individuals.			
40. Vendor has evidence that food commodities used are produced in the USA.			
41. The vendor has evidence that they maintain and report the total cost of raw food products used for the provision of nutrition services to the AAA monthly.			
42. The vendor submits prospective menus for review and approval by the AAA/AS and PDA.			
43. The vendor assures that all food items stored are physically separated from toxic materials in the food preparation area as well as in the senior center locations.  44. The vendor has evidence of maintaining			
accurate records of the USDA reimbursable congregate and home delivered meals served.			
SENIOR CENTER SERVICES			low, only if you provide ter Services
45. The senior center site operated by the vendor is aesthetically pleasing, of acceptable size and configuration, and has the proper facilities, furniture, lighting, ventilation, and atmosphere to promote comfort and attraction for AAA/AS consumers.			Visually scan location and facilities.

Compliance Questions	Compl	iance ?	Notes
	Yes	No	
46. The vendor has evidence that senior community centers are part of a comprehensive and coordinated system of services to support community based services and activities.			
47. The vendor (if a satellite senior center) has evidence that meal programs and the opportunity for socialization are present.			
48. The vendor is aware of the AAA/AS staff person who is responsible for the development, monitoring & coordination of all senior community center services within the planning and service area.			
49. The vendor has evidence that they have an ongoing program of training and staff development.			Review evidence of vendor's training program.
50. The vendor has evidence of an emergency preparedness plan.			Review plan.
51. The vendor has evidence that it has been instructed in their role and responsibilities during emergency situations as they relate to the AAA/AS.			
52. The vendor has evidence that emergency plan arrangements have been made, in consultation with fire departments and other relevant agencies responsible for responding to in-house emergencies.			
53. The vendor has evidence that in it's emergency plan, at a minimum, there is included a designation of trained personnel who will take charge during emergencies; posting of written notices throughout the vendor agency which identifies the telephone numbers of fire, police, ambulance services and evacuation procedures; the scheduling of fire drills twice a year; prearranged accommodations for people with disabilities in the event of a fire or evacuation; a procedure for recording of injuries to consumers and for reporting injuries to AAA/AS and insurance carriers; and, a procedure for reporting property which is stolen, lost, vandalized, damaged, or destroyed.			

Compliance Questions	Compliance ?		Notes
	Yes	No	
54. The vendor has evidence that it has established budgeting, accounting, and financial reporting requirements for all senior community center and satellite activities.			
55. The vendor has evidence of participation in a marketing strategy for all senior community center and satellite activities.			
56. The vendor has evidence that access to a variety of services; and such services and a activities are responsive to the needs and desires of the consumers and community served.			
57. Vendor has evidence that the senior community center or satellite center has established and maintains appropriate participant records, in accordance with forms approved/provided by AAA/AS.			
58. The Vendor has evidence of a Certificate of Occupancy from the Department of Labor and Industry.			Retain copy.
59. The vendor has evidence that their facility is accessible to the handicapped in accordance with section 504 of the Rehabilitation Act of 1973 and the Pennsylvania Handicapped Code, as amended.			
60. The vendor has evidence that the temperatures in the senior community centers during the winter months are maintained at 70 degrees (Fahrenheit).			
61. The vendor has a sign that identifies it as a senior community center.			
62. The vendor has evidence that any furniture and equipment purchased for use in the senior community center is selected for comfort and safety and compensates for visual and mobility limitations.			

Compliance Questions	Compl	iance ?	Notes
	Yes	No	
TITLE V - EMPLOYMENT SERVICES			elow, only if you provide ent Services
63. The vendor has evidence that a staff person is designated as the Employment Specialist/Coordinator.			
64. The vendor has evidence of a plan to assure appropriate and complete expenditure of Title V (Employment) funds.			
65. The vendor has evidence of posting required notices regarding lobbying and political activities in their office(s); and, include this information in their orientation packages for enrollees.			
66. The vendor has evidence of written coordination agreements with the Social Security Administration Office, Office of Employment Security, County Assistance Office, and other appropriate agencies.			Review written agreements.
67. The vendor has evidence of coordination with agencies and organizations in the community that work and assist handicapped and/or minority persons and agencies to ensure their participation in program activities.			
68. The vendor has evidence that they list both vacant and enrollment positions and names of enrollee/trainees as persons seeking jobs with the Office of Employment Security.			
69. The vendor has evidence of a system for providing information about its employment service to attract applicants and employers, and to inform the public-at-large.			Review system.
70. The vendor has evidence of giving priority to income eligible persons over 60 years of age for enrollment into the Senior Community Services Employment Program (SCSEP), to fill both authorized and temporary position.			
71. The vendor has evidence that a comprehensive employability plan has been developed and implemented.			Review Plan.

Compliance Questions	Compliance ?		Notes
	Yes	No	
72. The vendor has evidence of conducting orientation sessions for the SCSEP enrollees/ trainees and provide them with an orientation package of written material which includes, but is not limited to: enrollee training rights and responsibilities; grievance and complaint procedures; allowable and unallowable political and lobbying activities; and, intent of the SCSEP program.			
73. The vendor has evidence of keeping time sheets to assure enrollee/trainees work no more than 1,300 hours per a 12 month period.			
74. The vendor has evidence that every enrollee/ trainee file contains: the client intake form, client name, social security number, date of birth, age, income, date of enrollment, date of initial physical, date of recertification of income, date of reexamination (physical), date of reassessment, and assessment form.			
75. The vendor has evidence that enrollee/trainees are paid the Federal Minimum Wage, or above.			
76. The vendor has evidence that no enrollee/ trainee is permitted to be engaged in partisan or non-partisan political activities during hours for which the enrollee/trainee is being paid with SCSEP funds.			
77. The vendor has evidence that no enrollee/ trainee at any time is permitted to engage in partisan political activities in which such enrollee/ trainee represents himself as a spokesperson for the SCSEP.			
78. The vendor has evidence that no enrollee/ trainee may be placed in an elected official's office to perform partisan political functions.			
79. The vendor has evidence that they select host agencies for the SCSEP which contribute to the general welfare of the community.			

Compliance Questions	Compl	iance ?	Notes
	Yes	No	
80. The vendor has evidence that the selected host agencies provide adequate orientation to the vendor, instruction for the duties to be performed and supervision during work/training hours in safe and sanitary surroundings.			
81. The vendor has evidence that they monitor host agencies on a regular basis and keep monitoring reports on file, for review.			
82. The vendor has evidence that enrollees/ trainees do not displace currently employed workers or replace furloughed workers in host agencies.			
83. The vendor has evidence that they have developed a system to identify potential employers for SCSEP enrollee/trainees.			
84. The vendor has evidence that they have met the 20% transition rate goal to place enrollees/trainees into unsubsidized employment.			
85. The vendor has evidence of a plan to follow-up enrollee/trainees placed in unsubsidized employment.			
VOLUNTEER SERVICES		Answer be Volunteer	low, only if you provide Services
86. The vendor has evidence that coordination exists with local volunteer programs that include written working agreements with all existing senior volunteer programs.			
87. The vendor has evidence that they have a system of volunteer recruitment.			
88. The vendor has evidence that all volunteers receive an orientation and training.			
89. The vendor has evidence that all volunteers receive supervision, are evaluated, and that a program for recognition exists annually.			
TRANSPORTATION SERVICES			low, only if you provide ition Services
90. The vendor has evidence of written contractual agreements if they fund independently operated, non-coordinated transportation programs or services.			

Compliance Questions	Compliance ?		Notes	
	Yes	No		
91. Vendor has evidence that transportation services financed by AAA/AS include an intake & screening mechanism, effective dispatching mechanism, effective vehicle operation method, and acceptable vehicle shared use.				
92. Vendor has evidence that the provision of exclusive ride services is limited and only available on a supplemental basis, and only when it was demonstrated as the only possible method of providing service to the consumer.				
93. The vendor has evidence that all vehicles ordered or purchased with AAA/AS funds for passenger transportation comply with all safety and accessibility standards set by governmental regulation.				
94. The vendor has evidence that it has access to at least one vehicle for transporting clients confined to wheelchairs or having mobility problems.				
95. The vendor has evidence that all vehicles are equipped with a first aid kit, emergency flags for flares, 5 lb. dry chemical fire extinguisher, and emergency exits.				
96. The vendor has evidence that all vehicles are maintained in a safe operating condition through the use of a systematic preventative maintenance program.				
97. The vendor has evidence that all vehicles in the fleet have current Pennsylvania Motor Vehicle Inspections.				
98. The vendor has evidence that appropriate insurance is provided for vehicles furnishing passenger transportation services.				
99. The vendor has evidence that all drivers providing transportation services purchased or operated with AAA funds meet the following minimum requirements: Drivers must be at least 18 years of age; a medical examination once every two years which includes a vision test; and, a valid Pennsylvania Operators License.				

Compliance Questions	Compliance ?		Notes
	Yes	No	
100. The vendor has evidence that all information about a consumer gathered during the process of service provision is held in confidence and released to other professionals and agencies only with the consumer's written permission.			
IN-HOME SUPPORT SERVICES		Answer be	elow, only if you provide In-Home
		Support Se	ervices (Personal Care, Attendant Care, Assistance, Home Health or other rvices)
101. The vendor has evidence that they notify the AAA/AS in a timely fashion as to whether a referred consumer can be served, and when services can begin.			Review timeframe for vendor to fill referral for service.
102. The vendor has evidence of an individual file which includes a total plan of care, physician's orders, signed release of information forms, reviewed service and progress notes, a record of supervisory home visits, and a record of "follow-up" actions (if required) for each client referred by the AAA/AS.  Is this information reviewed by the vendor's supervisory personnel?  How often is each file reviewed?			
103. In-home monitoring visits are conducted with each consumer annually.			Explain in detail.
What does the vendor look for during these visits?  If a problem is detected, what course of action is taken and what time frame is used or given for corrective action?  Is there a follow up visit after the corrective action is taken and how soon is it scheduled?			
104. Does the vendor provide Personal Care Services? (Applies to Attendant Care & Personal Assistance Services as well)			
105. The vendor has evidence that all personal care consumers funded by the AAA/AS are current customers care managed by the AAA/AS.			
106. The vendor has evidence that personal care service is provided in compliance with the personal care definition by PDA.			

Compliance Questions	Compliance ?		Notes	
	Yes	No		
107. The vendor has evidence that a registered nurse is either administratively responsible for supervision of the personal care workers, or in a non-supervisory or consultative role, has regular contact with the supervisors and workers and has sufficient authority to intervene as needed to promote quality of care.				
108. The vendor has evidence that the records are maintained in a confidential manner for each individual receiving personal care.				
109. The vendor has evidence that each client file contains: data that identifies the client; a copy of the current service plan; the written assignment to the personal care worker; a worker daily log which indicates arrival and departure times and the specific services provided; the worker's comments and observations concerning the consumers conditions and his/her response to service including the reporting of charges and/or problems to the supervisor; a record of supervisory visits; statements of any change in the consumer's condition as observed and reported by the personal care workers and as acknowledged by the supervisor; and, statements of follow-up taken by the supervisor, including reporting of the incident (s) to the AAA/AS.			Review and compare bills and invoices with timesheets and call logs.	
110. The vendor has evidence of all home visits performed by the vendor's Registered Nurse and visits are made to a client's home every 90 days to monitor the personal care worker's performance.			Review log of home visits.	
111. The vendor has evidence that the provision of Home Health Services has been ordered by a primary physician.				
112. The vendor has evidence that the physician's order reflects the consumer's medical condition and/or disability.				
113. The vendor has evidence that the physician's order has been obtained prior to the authorization of Home Health Services.				

Compliance Questions	Compliance ?		Notes
	Yes	No	
114. The vendor has evidence that the physician's order includes specific nursing and/or therapeutic services.			
115. The vendor has evidence that the physician's order is reauthorized by the physician and obtained every 60 days.			
116. The vendor has evidence that nursing care is provided only by an individual(s) currently licensed to practice in Commonwealth of Pennsylvania as a Registered Nurse (RN) or a Licensed Practical Nurse (LPN) under the direction of an RN.			
117. The vendor has evidence that Home Health Aide Services are provided ONLY by supervised aides who have been trained - the training must be at least at the level required for licensed home health agencies.			
118. The vendor has evidence that Occupational Therapy (OT), Physical Therapy (PT), and Speech Therapy (ST) are provided ONLY by therapists currently licensed to practice in the Commonwealth of Pennsylvania.			
119. Does the vendor provide Home Support Services?			
120. The vendor has evidence that if they provide home maintenance activities, that they enable the client to maintain a safe and healthful environment and do not incorporate routine housekeeping.			
ADULT DAY CARE SERVICES			llow, only if you provide Adult Day Care Older Adult Daily Living Services)
121. Does the vendor provide Older Adult Daily Living (Adult Day Care) Services?			
122. The adult day care center site operated by the vendor is aesthetically pleasing, of acceptable size and configuration, and has the proper facilities, furniture, lighting, ventilation, and atmosphere to promote comfort and attraction for AAA/AS consumers.			Visually scan location and facilities; note impressions:
123. The vendor has evidence that it is licensed by the Commonwealth of Pennsylvania to provide Older Adult Daily Living (Adult Day Care) Service.			

Compliance Questions	Compliance ?		Notes	
	Yes	No		
LEGAL SERVICES		Answer be	low, only if you provide Legal Services	
124. The vendor has evidence that as a Legal Service subcontractor, they comply with Older Americans Act and PDA requirements.				
125. The vendor has evidence that they coordinate the provision of service with other legal services, the AAA/AS, and the client's own resources.				
126. The vendor has evidence that the legal services that they provide are legitimately chargeable to the AAA/AS according to the Legal Services definition by the PDA.				
127. The vendor has evidence that appropriate legal services are available to the institutionalized, isolated and homebound consumers of Lehigh County.				

Compliance Questions	Compliance ?		Notes
	Yes	No	

# For County Use Only:

<b>Areas of Non-Com</b>	pliance (corr	ective action r	needed/time i	frame for action):
, cas c c cc	Pilalice (coll		iccaca, mille	i aiiic ioi actioii/t

#### **List of Attachments:**

Monitors' Name(s)	Date of On-Site Visit	Date Reviewed/ Evaluated
1.		
2.		
3.		
4.		