MNRAAA

SERVICE PROVIDER HANDBOOK

2027

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General Statement

This Handbook is designed to provide additional information. The Grant Contract Agreement shall take precedence. This Handbook will provide guidance on policies set forth by the Minnesota River Area Agency on Aging, Inc. (MNRAAA), the Minnesota Board on Aging (MBA), and other relevant entities. All service providers must comply with all applicable laws and regulations, whether or not they are outlined in the Handbook.

Civil Rights

Service providers must make services available to all eligible individuals without regard to race, color, creed, religion, national origin, disability, or sex. All programs receiving federal funding must include a non-discrimination notice, which includes all the above-protected categories, in all written communications to the public, including brochures, bulletins, and posters.

Participants of meetings, training sessions, programs or other activities must be informed of the availability of reasonable accommodations by including the following language on bulletins, flyers, brochures and letters:

- If a client needs reasonable accommodation for disability (e.g., wheelchair accessibility, interpreter, Braille or large print materials) such accommodation can be made available upon advance request.

Service providers are encouraged to contact Minnesota Relay at 1-800-657-3775 or mn.relay@state.mn.us for more information.

To effectively communicate with individuals with visual impairments, all written communications for distribution to the public must contain the following statement indicating that alternative formats will be provided upon request:

- Upon request, this information will be made available in an alternative format, such as Braille, large print or audiotape.
- Notice of TDD numbers must be added to all written materials whenever a telephone number is listed, including on letterhead and bulletins. If the volume of calls you receive from people using TDDs is not significant, you may use the Minnesota Relay Service and include the following statement in lieu of a TDD number at 1-800-657-3775.

Service providers with fifteen (15) or more employees must designate an individual to coordinate efforts to comply with the rule and must adopt grievance procedures that provide for a prompt and equitable resolution of complaints.

Confidentiality and Disclosure of Information

Service providers should not collect or maintain social security numbers for individuals who receive Title III services. Service providers are expected to comply with the Minnesota Government Data Practice Act. Incidents of possible unauthorized access, use, or disclosure of non-public data must be reported immediately to MNRAAA in writing. Training must be made available to all staff and volunteers on the topic of confidentiality. The training shall take place within the first quarter of the calendar year, and the service provider must keep acknowledgments.

Cost Sharing

MNRAAA requires cost-sharing for the following Title III services:

- All Title III-E Caregiver Support Services
- Assisted Transportation
- Chore
- Counseling (Title III-B)
- Health Promotion Activities (Title III-B)
- Homemaker
- Home Modification
- Respite Care (Title III-B)
- Transportation

MNRAAA prohibits cost-sharing for the following services and populations:

- Information and assistance, outreach, and benefits counseling.
- Ombudsman, elder abuse prevention, legal assistance, or other consumer protection services.
- Congregate and home-delivered meals.
- Any services delivered through tribal organizations.
- People at or below the federal poverty level.
- People receiving services through a Medicaid Waiver Program (CADI, CAC, DD, EW, BI), the Alternative Care Program, or the Essential Community Supports Program.

A service provider must request a waiver from MNRAAA in applying cost-sharing to allowable services. The request must be sent in writing and include a rationale as to why the cost-sharing should be waived.

Data Collection and Reporting Requirement

Service providers operating registered services must obtain a license from PeerPlace®. Registered Service units must be inputted by Title III-B and Title III-E providers within PeerPlace® at least monthly. Service units for Title III-C1 and Title III-2 provider must be updated with the daily data no less than once per week for the prior week’s services. All data for the week (Saturday through Friday) must be entered by the following Friday by 5:00 PM (Central Standard Time), by the Title III-C1 and Title III-C2 Service Provider.

Service providers will, through SmartSimple, submit monthly or quarterly and annual reports. Financial reports are due on the 10th of each month in completed format and signed to request reimbursement. Progress and outcomes reports are due quarterly by the 15th of the month following the end of the quarter. Failure to provide timely reporting may result in withholding funding.

Definitions of Allowable Title III Services

The MBA prioritizes services to be offered in Minnesota as identified within the State Plan on Aging. MNRAAA prioritizes services to be offered within the twenty-seven-county Planning and Service Area (PSA) as identified with the Area Plan on Aging. Services offered by a service provider must align with the definition of the service provided by the MBA Policy (Provision of Title III Services Policy A Listing and Definition of Allowable Services).

These services are listed under Title III, and sub-categorized by service type.

- Title III-B Supportive Services
- Title III-C Nutrition Services
    - Title III-C_1 Congregate Dining
    - Title III-C_2 Home-Delivered Meals
- Title III-D Evidenced-Based Health Promotion Program
- Title III-E Family Caregiver Services

Emergency Planning

Emergency preparedness and continuity of operations planning are considered good business practices. Part of the fundamental mission of all government and community service agencies is to be prepared to respond to all potential emergencies. MNRAAA has on file an Emergency Preparedness Plan and Continuity of Operations Policy. Each service provider must develop emergency plans. These plans should include:

- Identifying the main contact in case of emergency.
- How communication will occur with staff and clients during an emergency.
- Plan to respond to different types of emergencies.
- Communication plans with MNRAAA.

Service providers are encouraged to conduct an annual risk assessment to identify potential disasters and hazards. This assessment will help providers develop their plans.

Eligibility and Person-Centered Planning

The Older Americans Act (OAA) establishes eligibility requirements to receive OAA-funded services. The OAA requires an individual to be at least 60 years old to be eligible to receive most Title III-funded services. To receive Title III B-funded registered Supportive Services, an individual must be 60 years of age or older.

To receive Title III C-funded Congregate Meals, an individual must meet one of these eligibility categories:

- Client (age 60 or older).
- Spouse of client (regardless of age).
- Staff age 60+ (who work at congregate dining site).
- Volunteer (individual of any age providing volunteer services during meal hours).
- An individual with disability under age 60 (who lives in a housing facility occupied primarily (i.e., more than 50%) by older adults at which congregate nutrition services are provided).

To receive Title III C-funded Home-Delivered Meals, an individual must meet one of these eligibility categories:

- Client (age 60 or older).
- Spouse of client (regardless of age).
- An individual with disability under age 60 (who lives with an eligible client age 60 or older).
- Volunteer (individual of any age providing volunteer services during meal hours).

To receive Title III D-funded Evidenced-Based Health Promotion Services, an individual must be 60 years of age or older.

To receive Title III E-funded Caregiver Support, an individual must meet one of these eligibility categories.

1. Adults caring for older adults (meaning the care receiver is 60 years or older), who are informal providers of in-home and community care. The caregiver and care receiver do not necessarily live together and do not have to be related.

2. Adults providing informal in-home and community care for individuals of any age with Alzheimer's disease or a related disorder with neurological and organic brain dysfunction. The caregiver and care receiver do not necessarily live together and do not have to be related.

3. Caregivers who are 55 years or older and are a grandparent, step-grandparent, or other relative (other than the parent) of a child by blood, marriage or adoption and is an informal provider of in-home and community care. The caregiver:
    a. Lives with the child.

   b. Is the primary caregiver of the child because the biological or adoptive parents are unable or unwilling to serve as the primary caregiver of the child.
   c. Has a legal relationship with the child, such as legal custody or guardianship, or is raising the child informally.

4. Caregivers who are 55 years or older and a parent, grandparent, or other relative by blood, marriage, or adoption of an individual with a disability [as defined in Section 3 of the Americans with Disabilities Act of 1990 (42 USC 12103)], ages 19-59 and is an informal provider of in-home and community care. The caregiver lives with the individual.

5. For respite care and supplemental services only, to family caregivers of adults aged 60 and older or of individuals of any age with Alzheimer's disease or a related disorder, the individual for whom they are caring must be determined to be functionally impaired because the individual:
   a. Is unable to perform at least two activities of daily living without substantial assistance, including verbal reminding, physical queueing, or supervision.
   b. Due to cognitive or other mental impairment, requires substantial supervision because the individual poses a serious health or safety hazard to themself or others.

All service providers shall use the most recently available NAPIS registration form, as provided by the MBA. The service provider shall ask all individuals all of the questions that is on the NAPIS form and record the applicable answer on the form.

If clients are reluctant to provide the requested information, the service provider should explain the information needed for eligibility purposes and help build a service plan tailored to their needs. The service provider should also ensure that clients' information will be treated as confidential.

If a client refuses to provide specific data, the service provider must record this on the paper form or select an option from the drop-down list on the electronic form, indicating that the client refuses to respond to the question.

This information must be recorded on the NAPIS form in either electronic or hard copy form. The data will be entered by the service provider into the MBA's preferred platform, PeerPlace® data application.

Evaluation of Performance

MNRAAA shall, upon completion of the grant, evaluate the providers' performance in relation to the services provided within the grant. Included within the evaluation will be the following information:

- Service provider name, grant/contract award amount, and amount of grant/contract paid to service provider.
- The start and end dates of the grant award or contract period.
- Description and purpose of the grant or contract and proposed outcomes.
- Description of actual outcomes.
- If applicable, additional conditions specified in the grant or contract agreement as a result of the pre-award risk assessment process.
- Compliance with reporting requirements.
- Monitoring and financial reconciliation results.
- Any fraud, waste, or abuse concerns.
- If the grant or contract was terminated for cause.
- Any unresolved issues or concerns
- Agency's satisfaction with the grantee's timeliness, quality of work, and overall performance.

The evaluation may be used as a factor in determining if further grants may be awarded to the organization.

Grant and Contract Agreement

MNRAAA shall enter into a formal Grant Contract Agreement (Agreement) with service providers who provide Title III-funded services within the PSA. The Agreement will be awarded following a competitive request for proposal (RFP) process. Agreement amendments shall be made for service providers that are in renewal status, not to exceed five (5) years.

Changes to fully executed agreements will be made through amendments. An amendment is an addition, deletion, or change to a fully executed agreement. MNRAAA shall maintain the original and all subsequent amendments. If a modification to the agreement results in a change to the total obligation, compensation, expiration date, or duties associated with the agreement, those changes will be made through an amendment.

Extensions of an existing agreement from one year of an Area Plan cycle to a subsequent year are informally referred to as "renewals" and will be processed as an amendment.

Agreements may be amended only when the purpose of the amendment is similar to the original purpose and when the service provider's duties are within the scope of the original RFP or grant application.

Agreement attachments, exhibits, and approved grant application materials with corresponding grant award notices may also be revised as part of a contract or grant agreement amendment.

Greatest Economic Need and Greatest Social Need

MNRAAA regularly completes a demographic analysis. The analysis is completed in line with the Area Plan. The most recent iteration is called the MNRAAA Population Profile 2024. This Profile assists in defining, within our twenty-seven-county area, the population with the greatest economic need (GEN) and greatest social need (GSN). Providers are encouraged to review the profile to assist in focusing their attention to the population that meets the definition of GEN and GSN.

Greatest Economic Need (GEN): an individual with an income level at or below the Federal poverty level and, other local and individual factors, including geography and expenses.

Greatest Social Need (GSN) is defined by non-economic factors. This may include, but may not be limited to:

- Rural or Geographical isolation
- Physical or Mental disabilities
- Language barriers
- Racial or ethnic status
- Native American identity
- Sexual orientation
- HIV Status
- Chronic Health Conditions
- Housing Instability
- Food Insecurity
- Lack of reliable clean water supply
- Lack of transportation
- Assistance with utility needs
- Domestic safety concerns

Grievance

Service providers must develop policies and procedures to address grievances from those who access Title III services. Service providers must make an electronic or paper form available to individuals requesting to file a grievance. The grievance form must include fields for an individual’s contact information as well as the nature of the complaint and what, specifically, the individual would like to have resolved. *The MBA will provide a template form that may be used; service providers may choose to use their own form if it includes at least the same information as the MBA template form.* Forms must be made available in alternate languages upon request.

Service providers must also have a form that allows an older Minnesotan to designate a representative to act on their behalf solely for the purpose of filing a complaint. *The MBA will provide a template form that may be used for this purpose; service providers* *may choose to use their own form if it includes at least the same information as the MBA template form.*

If an individual provides documentation of an established Power of Attorney, the service provider must accept that as documentation, the individual designated as having Power of Attorney is the designated representative, with no further documentation required. A designated representative may receive information about the older adult filing the grievance. The completed form designating a representative, or other legal documentation establishing the same, must be maintained on file and shared with MNRAAA.

Service providers must accept verbal or written grievances. Individuals may request assistance in filing a grievance; if such a request is made, the service provider must provide assistance in filing the grievance. If the grievance is verbal, the service provider must document the filing of the grievance in writing, as explained by the individual filing the grievance.

The service provider who has received the grievance must assess the grievance and determine whether the grievance involves immediate health or safety issues for the individual filing the complaint. The service provider must address any health and safety-related grievances promptly, including by referring an individual to other community-based services if they are unable to provide services to the individual. If warranted, the service provider shall make a report to the Minnesota Department of Human Services, Minnesota Adult Abuse Reporting Center (https://mn.gov/dhs/report-abuse/) or at 1-844-880-1574.

A service provider must decide whether the underlying circumstance may be reasonably remedied. Service providers must make reasonable efforts to address the underlying grievance within the limits of available funding and other relevant circumstances.

A service provider must follow up in writing with the individual filing a grievance, providing a response to the issue raised within fourteen (14) calendar days of receiving the grievance. The response must include whether the individual's grievance can be remedied, how it can be remedied, or if the grievance cannot be remedied, an explanation of the reason why this is the case. Service providers should aim to resolve all grievances during that period. However, if the grievance is not resolved in thirty (30) calendar days, the service provider will document the reason for the delay and a plan for resolution.

Service providers receiving documented grievances must report this information in writing to MNRAAA within seven (7) calendar days of receiving the grievance. Service providers must also report the resolution of the grievance within thirty (30) calendar days of receiving the grievance. Information reported to MNRAAA must include the written grievance, the completed form authorizing a representative to act on the older adult's behalf if one was completed, and the service provider's written response to the grievance.

Nothing in this substitutes the service provider’s employees or volunteers in following the Minnesota Statute 626.557 Vulnerable Adult Act.

Home Modifications

Home Modifications are services provided to older adults (60+) that are necessary to ensure their health and safety. If a service provider identifies Home Modifications as a priority, they shall submit to MNRAAA, in writing, how Home Modifications will assist within the PSA. The request will include:

- Service Provider Name.
- OAA Title III Contract number.
- Anticipated total cost of project.
- Describe project being requested.
- What assessments will be made to ensure that the participant’s needs will be met through Home Modifications.
- Project budget
- Credentials of provider/contractor, including contractor license number
- Any other information that would support this request

Monitoring Service Providers

MNRAAA shall monitor and assess all Title III grantees, prior to the conclusion of the grant award, to ensure that funds are expended in keeping with the purpose for which they were awarded. This shall include, but not be limited to:

- Compliance with all applicable laws and regulations.
- Compliance with policies of the OAA, the MBA, and MNRAAA.
- Review the need for technical assistance by the grantee.
- Potential challenges by the grantee in providing Title III Services.
- Review of new requirements, policies, procedures, and updates that may affect the program.
- Review the outcomes of the program. This shall include financial and program outcomes.
- Review of provider policies and procedures relating to the program.
- Identification of potential training opportunities.

The review will include client-specific information through the National Aging Program Information Systems (NAPIS) documentation, at a minimum, twenty (20) individual records.

- Verify that the NAPIS is up to date regarding timeframe (completed upon time of start of services and is updated annually).
- Review the records to verify that the units received are in line with the program.

Note: if there are not twenty individual records available at the time of assessment, MNRAAA will review all records.

The service providers will submit, at a minimum, a half-year narrative report to MNRAAA. This report is the performance report submitted through SmartSimple.

All reimbursement requests will be reviewed on a monthly or quarterly basis. This includes any expenditures relating to the program. A financial reconciliation of all providers with a grant exceeding $50,000 (including the initial budget and any subsequent amendments made during the calendar year) will be completed.

On-site monitoring will take place at the provider's site. If an on-site is not practicable, the service provider must inform MNRAAA in a timely manner.

MNRAAA shall determine what providers will receive an on-site assessment and a financial reconciliation within the First Quarter of the calendar year. The plan, which includes the staff member scheduled to complete the assessment, will be provided to the MBA.

Pre-Award Risk Assessment

A Pre-Award Risk Assessment (PARA) is a tool used to assess the risk that the service provider may be unable or unwilling to perform the required duties specified in the agreement. MNRAAA will complete a PARA to all service providers for Title III funding exceeding $50,000.

The PARA will include:

- The potential service provider’s history of performing duties similar to those required by the agreement.
- Whether the agreement requires the potential service provider to perform services on a significantly increased scale and, if so, whether the service provider has the capability and organizational capacity to do so.
- Review the potential service provider’s financial information and internal controls.
- Reports and findings from audits.
- Review compliance with certain other state and federal requirements.

For service providers who may not have a history of performing similar services for which they are applying, MNRAAA reserves the right to require additional information.

Program Income

Program income means gross income received by the grantee that is directly generated in whole or in part by a grant-supported activity or earned because of the grant agreement during the grant period. For example, voluntary contributions, cost-sharing payments, and income from the use of property acquired with grant/contract funds are all considered program income.

Service providers shall use and account for the program income prior to calculating the amount to be billed to the agreement and requesting reimbursement for expenses or services. All program income must be used to expand a service funded under the Title III grant award pursuant to which the income was initially collected.

Purchase of Equipment

Equipment purchases are allowable up to $10,000 in accordance with 2 CFR 200.1. For equipment purchases over $10,000, the service provider must submit a written request to MNRAAA. Within the request, the following information shall be included:

- Evidence of the equipment supporting those with the GEN and GSN.
- How the equipment will assist the service provider to provide services to older adults or caregivers.
- Future impacts of the equipment, or lack thereof.
- Lack of funding from third parties, such as rental agreements.
- How the costs will be allocated to the program.

The service provider shall use the State of Minnesota resources for equipment and supply purchases, including the following:

- Use of Targeted Group, Economically Disadvantaged and Veteran Owned businesses for purchases up to $100,000.
- Use of the State of Minnesota's Cooperative Purchasing Venture process for goods, certain services, and utilities.

Reimbursement

Service provider requests for reimbursement must correspond to the line items in the approved budget and to the number of units provided and individuals served. MNRAAA shall review each request for reimbursement against the number of units provided and individuals served as recorded in PeerPlace® (or, in the case of unregistered services, in Grant Utility), approved budget, grant expenditures-to-date, and the most recent service provider progress report prior to approving payment.

MNRAAA may reimburse a service provider either in the form of a reimbursement or an advance payment. Reimbursement is the preferred method of payment. MNRAAA may make advance payments in certain situations as described below:

- Before making an advance payment, MNRAAA will ensure the service provider will be able to account for the grant funds and abide by the terms of the agreement based on their past performance and the evaluation of the service provider's recent financial statements as required under other state grants management policies.
- Service provider must prepare a written justification that describes the specific need to utilize advance payments. The written justification must be approved

prior to encumbrance. A record of the signed justification must be maintained in the service provider’s file.

- The terms of advance grant payments and settlements must be reflected in the grant or contract agreement. All advance payments on agreements over $50,000 must be reconciled prior to requesting another advance payment, within 12 months of issuance, or within 60 days of the end of the grant period.
- Service providers may only request advance payments to meet their immediate cash needs for paying for allowable costs under their agreement. Service providers must minimize the time elapsing between receipt of funds and their disbursement.
- To the extent available, the service provider must disburse funds available from program income before requesting additional cash payments from MNRAAA.
- Service providers must maintain advance payments of Federal awards in interest-bearing accounts, unless the best reasonably available interest-bearing account would not be expected to earn interest in excess of $500 per year on Federal cash balances and the depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.
- Interest earned amounts up to $500 per year may be retained by the service provider for administrative expenses. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the U.S. Department of Health and Human Services.
- MNRAAA shall evaluate the service provider’s cash requirements, including cash on hand, prior to making payments. Advance payments for grant awards shall be limited to the cash requirements for the period and shall not be made in predetermined payments during the grant year.

MNRAAA will pay service providers within ten (10) days of receiving payment from the state for undisputed services provided by subgrantees or contractors.

Renewal Process

Title III awards are approved for funding annually for one year and are subject to renewal for up to four additional years. A renewal occurs when a competitive Request for Proposal (RFP) process does not occur. All current providers are welcome to renew their agreement. MNRAAA will use an amendment process on the original Agreement to renew the award.

An amendment is an addition, deletion, or change to a fully executed agreement. MNRAAA shall maintain the original and all subsequent amendments. Agreements may be amended only when the purpose of the amendment is similar to the original purpose and when the service provider's duties are within the scope of the original RFP or grant application. Agreement attachments, exhibits, and approved grant application materials with corresponding grant award notices may also be revised as part of a contract or grant agreement amendment. Approval of Agreement renewal years is not guaranteed but will be based on performance, availability of funds, emerging needs/gaps in service, and federal, state, and local priorities.

Request for Proposal (Procurement)

MNRAAA will make public a RFP when OAA funding is available. The RFP will be a competitive process to occur at least every five (5) years. Funding awards are to be prioritized for public or private non-profit agencies, units of government and for-profit organizations (for-profit organizations require a waiver) that demonstrate the ability to perform successfully under the terms and conditions of the award. MNRAAA will promote the RFP to all eligible organizations with a footprint within the PSA and to those organizations authorized to work in the State of Minnesota.

The RFP will be promoted across the PSA via email, major newspapers, previous applicants, social media, and the Minnesota State Register, if applicable. This is not an all-inclusive list. MNRAAA, from time to time, may host a respondents’ conference or webinar for RFPs.

All applications that meet the minimum requirements and have provided all necessary information will be reviewed by the MNRAAA Advisory Council. The Advisory Council will review each application using a standardized review system. The Advisory Council will make recommendations on funding to the MNRAAA Board of Directors. Applicants may be called to present their application to the Advisory Council. MNRAAA reserves the right to reject any or all applications.

Senior Nutrition Site

MNRAAA defines a senior nutrition site as either a congregate dining site or a central kitchen that prepares meals for home delivery. A senior nutrition site location shall be situated as close as possible to the most eligible older people and have a location acceptable to the participants who will use it.

A nutrition provider may not relocate or close an existing senior dining site without obtaining the written approval of MNRAAA prior to relocating or closing the senior dining site. The nutrition provider must submit, using the Senior Nutrition Site Location form, the request to relocate or close an existing senior nutrition site. The nutrition provider must place this request at least ninety (90) days prior to relocation or closure.

If MNRAAA approves the site closing, the nutrition provider shall ensure that the participants receive at least one month's notice. The nutrition provider shall make every effort to transfer the participants to another site.

When highly unusual and extenuating circumstances make it impractical to provide participants with a full thirty (30) day notice of site closure, MNRAAA will consult with the MBA on the situation and take the best practical measures to assist participants.

A nutrition provider must consult with and obtain approval from the MNRAAA prior to opening a new senior dining site. Approval of the opening of a new site will be based on, but not limited to, the following:

- Number of older adults in GSN and/or GEN in the area.
- Evidence of community support, including space, staff, etc.
- Availability of volunteers.
- Lack of nutrition services in the area.
- Availability of other services from a community focal point.
- Funding beyond OAA Title III C funding for a specific site or for nutrition services across the PSA.

Supplement

Service providers will utilize OAA funding to supplement, not supplant, existing Federal, State, and local funds expended to support services for older Minnesotans.

Supplant: means reducing other Federal, state, or local funding sources spent on services for older adults by substituting OAA funding in their place.

Supplement: is defined as increasing the amount of resources spent on services for older adults by adding OAA funding to previously committed Federal, state or local sources paying for services for older adults or providing a new service not previously paid for by another funding source. Local sources include “funds from fundraising activities, reserve funds, bequests, or cash or third-party in-kind contributions from non-client community members or organizations.”

Third-Party (Supplier) Agreements

Service providers who enter third-party (supplier) agreements must submit, within the application period, all agreements to MNRAAA. MNRAAA will not enter into any agreement with the service provider until a review of all supplier agreements has been completed. MNRAAA will use a Decision Tree to define whether the agreement with the supplier creates a contract or a subrecipient (subrecipient is also referred to as a subaward or subgrantee, in this context MNRAAA will use subrecipient) relationship.

If the agreement creates a contract, no further follow-up is necessary from the service provider. The contract shall be maintained by MNRAAA in accordance with the original Grant Contract Agreement with the service provider.

If the agreement creates a subrecipient relationship between the service provider and supplier, MNRAAA will complete the following items with the subrecipient:

- Conduct a pre-award risk assessment for subawards that are $50,000 and greater.
- Conduct site visits.
- Reimburse all invoices relating to the project.

- Manage financial reconciliation processes where applicable.
- Review service providers' data for completion and accuracy.
- Close out grant and contract awards.
- Write provider evaluations.

Service providers may choose to operate in an Intermediary Capacity between MNRAAA and the supplier. If the service provider chooses that role, they may complete the following tasks:

- Cultivate relationships with smaller and culturally specific community-based organizations.
- Respond to AAA requests for proposals and include other service providers in their responses.
- Provide direct service to individuals with GSN and GEN who are not receiving the same service from subcontracted service providers.
- Provide outreach to prioritized populations with GSN and GEN.
- Perform client intake and completion of NAPIS forms on behalf of subcontracted service providers.
- Gather and aggregate data reported by subcontracted service providers for submission to MNRAAA.
- Assist with educating subcontracted suppliers about their responsibilities in the management of federal funds.
- Assist subcontracted service providers by organizing documents for pre-award risk assessments where applicable.
- Assist with strategies and solicitation process for voluntary contributions (and cost-sharing where applicable).
    - All contributions, whether voluntary or cost-sharing, must be made directly to the subcontracted service provider and not to the intermediary service provider.
- Prescreen requests for payment to ensure they include necessary information and align with program income requirements.

Title VI Coordination

Service providers must make efforts to coordinate programs under Title III and Title VI, Grants to Indian Tribes and Native Hawaiian Grantees for Supportive, Nutrition, and Caregiver Services, with Title VI grantees. MNRAAA shall coordinate needs with Title VI grantees within the PSA.

Voluntary Contributions

Voluntary contributions, as defined in the OAA, mean donations of money or other personal resources given freely, without pressure or coercion, by individuals receiving services under the Act. Voluntary contributions must be allowed and can be solicited for all Title III-funded services, with the suggested contribution to be based on the actual total cost of services.

For individuals whose self-declared income is at or above 185 percent of the Federal Poverty Level, voluntary contributions should be encouraged.

In requesting voluntary contributions, one must be made in a non-coercive manner and must adhere to:

- Conducted in such a manner as not to cause a service recipient to feel intimidated or pressured into contributing.
- All recipients of services shall be provided:
    - An opportunity to voluntarily contribute to the cost of the service.
    - Clear information, including information in alternative formats and in languages other than English upon request, explaining that there is no obligation to contribute, and the contribution is voluntary.
    - Protection of privacy and confidentiality of each recipient with respect to the recipient's income and contribution or lack of contribution.

The service provider shall not means test, meaning the use of the income, assets, or other resources of an older person, family caregiver, or the households of these individuals to deny or limit that person's eligibility to receive services.

The service provider will not deny services to an older adult or caregiver if they cannot or will not make a voluntary contribution.