MEMORANDUM

To: Municipal Leaders and Senior Center Directors

From: Lara Stauning, Staff Attorney, Department of Aging and Disability Services, SUA

Re: Frequently Asked Questions RE: 2022 State ARPA Funding – Statewide Senior Centers

Date: 04/17/2023

This document provides the Department's responses to frequently asked questions (FAQs) related to American Rescue Plan Act funds that were allocated to Connecticut Senior Centers under Public Act 22-146. These FAQs are intended to aid Senior Centers in the administration and use of these funds in accordance with federal law. This document is intended to be a source of guidance, however, please note that it will be updated occasionally as we have more information.

FAQS:

Q: What Senior Centers are eligible to have projects/needs funded?

A: Municipally based, as well as 501(c)(3) non-profit Senior Centers, are eligible to receive funding through these ARPA funds, so long as they fit the working definition of a "Senior Center."

For the purposes of this funding opportunity, the definition of a Senior Center is: "Senior centers include municipal senior centers and 501(c)(3) senior centers. For the purposes of this funding opportunity, senior centers are defined as those that provide multiple services including the core services of information, referral, and assistance. Additional services could include nutrition, wellness, educational, social, and recreational activities."

Q: The "Senior Center" definition states, "…senior centers are defined as those that provide multiple services, including the core services of information, referral and assistance…"; in this case, what does "Information, referral and assistance" mean?

A: To determine whether your older adult programming fits the definition of senior center, please follow the definition of information and assistance that is used by our primary funder, the Older Americans Act.

> *Information & Assistance is defined under the Older Americans Act (OAA) as: A service for older individuals that— (A) provides the individuals with current information on opportunities and services available to the individuals within their communities, including information relating to assistive technology; (B) assesses the problems and capacities of the individuals; (C) links the individuals to the opportunities and services that are available; (D) to the maximum extent practicable, ensures that the individuals receive the services needed by the individuals, and are aware of the opportunities available to the individuals, by establishing adequate follow-up procedures; and (E) serves the entire community of older individuals, particularly— (i) older individuals with greatest social need; (ii) older individuals with greatest economic need; and (iii) older individuals at risk for institutional placement.*

The following is further clarification about these services:

> *Information & Referral and Assistance (I&R/A) denotes a more in-depth process and more enhanced service than traditional I&R, including individualized access assistance, extensive follow-up and individual advocacy if necessary & requested; it is generally less population-specific, expanding to all people who require assistance with accessing services and their caregivers.*

We encourage potential beneficiaries to explore whether the services that they have meet the funding definition of "Senior Center" which includes the definition of information and assistance; further clarification of this service as outlined above. If the municipal entity does not meet the definition of a "Senior Center," the municipality may re-allocate the funds awarded to your community, to another community that does house a Senior Center that may provide service to your community's older adults.

Q: What if our Senior Center is not a stand-alone Senior Center?

A: Senior Centers and Senior Center programming is hosted in a variety of places and spaces, depending on the town- some are stand-alone, and others are embedded within larger community centers or are housed with other departments or organizations.

The Senior Center definition was made to be broad and as inclusive as possible, though it does illustrate that "Senior centers include municipal senior centers and 501(c)(3) senior centers. For the purposes of this funding opportunity, senior centers are defined as those that provide multiple services including the core services of information, referral, and assistance. Additional services could include nutrition, wellness, educational, social, and recreational activities."

Q: Is the $10 M Statewide Senior Center funding a competitive grant?

A: No. Each Senior Center in Connecticut (municipal and nonprofit) that meets the definition of a "Senior Center" is eligible to receive a portion of the $10M allocated to their respective municipality. The Allocation Chart was completed and sent out to municipalities on February 10, 2023. Municipalities and Senior Centers are required to work cooperatively to determine a reasonably proportional amount to be allocated to each of the senior centers within their municipalities. Municipalities shall also include any <u>nonprofit senior centers located within the municipality that serves the residents of the municipality.</u>

Q: Is this one-time-only or reoccurring funding?

A: ARPA funding is one-time-only.

Q: When is the submission period?

A: Beneficiary Information Forms (BIF) may be submitted on a rolling basis through 6/28/2024.

Q: Who is the approving/disapproving entity of proposed uses submitted by the senior centers?

A: The State Unit on Aging (SUA) within the Department of Aging and Disability Services will provide a preliminary review of the proposals to ensure that they comply with the acceptable uses under the American Rescue Plan Act (ARPA) and legislative intent. The Office of Policy Management (OPM) will provide final approval of all proposals.

Q: When do awarded funds need to be expended?

A: All awarded funds must be expended by 12/31/2026, however funds must be obligated by contract for projects by 12/31/2024. Any funds not obligated by 12/31/24 and not expended by 12/31/26 must be returned.

Q: Can ARPA funds be expended through 2026?

A: Yes, however, ARPA funds must be **obligated** by 12/31/24. Any ARPA funds not obligated by 12/31/24 must be returned. Funds that are obligated by 12/31/24, must be expended by 12/31/26. Any funds obligated but not expended by 12/31/26 must be returned. *Sec. 31 CFR 35.5, Use of funds.*

Q: What does "obligated" mean?

A: Under ARPA " 'Obligation' means an order placed for property and services and entering into contracts, subawards, and similar transactions that require payment." *Sec. 31 CFR 35.3 Definitions.* In order for funds to be considered obligated, the senior center must commit funds in a written contract or other agreement to a particular eligible use by the end of 2024. Funds may be expended after 2024 so long as the payment occurs before December 31, 2026.

Q: Who is responsible for completing the Beneficiary Information Form (BIF)?

A1: Every municipality who hosts a municipally supported senior center/s and who wishes to receive ARPA funding will identify a representative who will be responsible for completing the BIF. The BIF will include explanations for ALL municipally supported senior centers in that town.

A2: Non-profit senior centers will submit a BIF to identify their proposed plans for ARPA funding. There is a separate and unique BIF that non-profit senior centers will use; upon receipt of the Municipal BIF which identifies the non-profit senior center allocation, the SUA will send the leadership of the non-profit senior center this form to complete. Non-profit senior center leadership may also request this BIF by emailing the SUA at stateunitonaging@ct.gov.

Q: Does my municipality or senior center have to request the full amount of allocated funding?

A: No. Municipalities and senior centers have the choice as to the amount of money they request, so long as the request does exceed the total amount allocated.

Q: How long after I submit the BIF will my municipality/senior center receive the funding?

A: This is dependent administratively on how many BIFs are received and whether the SUA has any additional questions for clarification to approve the plan/s.

Q: What if my municipality's/senior center's proposal does not get approved?

A: The SUA is prepared to work with individual Beneficiaries who may have questions, or who may have challenges identifying eligible projects or in preparing their proposal and completing the BIF. If an entity submits a proposal that does not comply with ARPA or legislative intent, it may re-apply with a new proposal before the deadline.

Q: Can a Senior Center or municipality revise their plan to use the ARPA funding after they have already submitted their Beneficiary Information Form?

A: Yes, but we strongly encourage Senior Centers and municipalities to take ample time to plan proposed uses thoughtfully and thoroughly before submitting their Beneficiary Information Form to avoid the need to make revisions. The SUA understands that unavoidable circumstances may exist that require a resubmission; we request that municipalities and Senior Centers notify the SUA as soon as possible if they believe a revision will be necessary. Depending on the situation, this may require the submission of an entirely new Beneficiary Information Form. Additionally, depending on SUA capacity, this may result in a delay in the review and approval process.

Q: I am a municipality who has more than one senior center within its town limits. How will the funds be allocated?

A: Each municipality is responsible for creating a distribution plan for the ARPA funds that were allocated to them based on the number of Senior Centers within the municipality or that serve their residents. The distribution plan, that municipalities with more than one Senior Center will be required to submit as part of the Beneficiary Information Form, must indicate the portion of their municipality's total allocation that will be awarded to each Senior Center. Municipalities will also be asked to provide a brief explanation of their basis for how the funds were allocated.

Q: I am a municipality that has a Non-profit Senior Center within its town limits. How are the funds allocated?

A: Municipalities are required to include both municipal and nonprofit senior centers in their distribution plan for the ARPA funds that were allocated to the municipality. The amount allocated to each senior center should be communicated by the municipality to each nonprofit senior center on municipal letterhead, signed by town leadership, to verify the town's decision to make the allocation and the amount of such allocation. The non-profit senior center will submit this within its BIF when requesting their allocation of funds.

Q: I am a municipality that has a non-profit senior center within its town limits. Should I include their plans in our BIF?

A: No. Non-profit Senior Center will be requesting their allocation of funding separately, you as the municipality should NOT include the non-profit's plans, or funding allocation within your municipality's BIF.

Q: I represent a nonprofit Senior Center and wish to request our ARPA funding.

A: Once a municipality has determined the portion of ARPA funding that will be delegated to your nonprofit senior center via the submission of their Beneficiary Information Form (BIF), the SUA will reach out to non-profit senior centers directly. The SUA will provide the nonprofit with a "Beneficiary Information Form" specifically designed for nonprofit senior centers to complete and return to the SUA. **PLEASE NOTE:** Non-profit Senior Centers have a separate BIF to complete to request funds. Leadership within these centers should be completing the "CT Non-Profit Senior Centers ARPA Beneficiary Form".

Q: When you say "mitigate the spread of COVID-19 or respond to the negative impacts of the pandemic" what kinds of connections are you looking for? Can you provide some examples?

A: ARPA Senior Center funds <u>must be used to mitigate the spread of COVID-19 and/or to respond to the negative public health impacts of COVID-19</u>. Submissions must provide an explanation of how the proposed projects achieve one, or both, of these goals. Explicitly state how the proposed project will either mitigate the spread of CODIV-19 or how it will respond to the negative public health impacts. For example: A new HVAC system for better improved air quality for indoor events; Outdoor space to improve ability to provide outdoor programming and to socially distance/include more people; Purchase of registration software: touch-free registration and attendance and exchange-free registration process; renovation of a specific space to make ADA compliant because you've seen an increase in DME (durable medical equipment) of your users/members since coming back after the pandemic.

Q: May a municipality that received a specific line item for their Senior Center in the 2022 state budget (Avon, Dixwell, Eisenhower, Ellington, Orange & Sullivan Senior Centers) wait to submit their Beneficiary Info Form until they are notified of the portion of the $10M statewide senior center funding that they will be receiving?

A: Yes. Municipalities can wait until they know the amount of the $10M that their town will be receiving before sending in the Beneficiary Info Form. They, however, will be asked to submit separate Beneficiary Info Forms for each source, one for their specific award and one for their portion of the state-wide award.

Q: May a municipality that received a specific line item for their Senior Center in the 2022 state budget (Avon, Dixwell, Eisenhower, Ellington, Orange & Sullivan Senior Centers) use their individual allocation, along with their portion of the $10M statewide senior center funding together to support the same project?

A: Yes. ARPA funds may wholly, or partially support projects. Beneficiaries will have the opportunity to identify what other funding streams will be used to support eligible projects within the BIF. ARPA funds can work with ARPA funds (the individual allocation and the portion of the $10M allocation) to wholly or partially support projects that fall within the eligible uses of "facility improvements" or "programming".

Q: **Can funds be used to pay for COVID-19 related costs incurred prior to signing the final beneficiary agreement?**

A: This is currently under review.

Q: What is the definition of "capital expenditure" for purposes of ARPA?

A: "Capital expenditures" means expenditures to acquire capital assets or expenditures to make additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life. *Sec. 2 CFR 200.1 Definitions* .

Q: What kind of reporting will be mandated for taking part in this opportunity?

A: All Beneficiaries of ARPA Senior Center funds will have the opportunity to report to the State of Connecticut regarding this project. Beneficiaries will be asked questions pertaining to ARPA-funded projects throughout the process and once these projects are complete. All Beneficiaries should have on hand, in the case of an audit, bills and invoices and expense reports associated with the use of ARPA funds. The SUA is developing a periodic report form and an end of project report form that will be distributed at a later date that provides due dates and the specific information requested. Guidance regarding program reporting will be shared before senior center funds are distributed.

Q: I am having difficulty logging into either one of the Beneficiary Information Forms and am getting an error message:

A: Try opening the BIF in an "incognito" or "in-private" window. You may do this by right clicking on the BIF link, "copying" the URL and pasting it into an in-private or incognito window. Review the recording of the SUA's technical assistance sessions regarding the BIF. If you continue to require additional trouble shooting after engaging your own IT resources, please reach out to the State Unit on Aging at stateunitonaging@ct.gov .

Q: What if I cannot complete the Beneficiary Information Form in one sitting? Do I lose all the information that I have entered?

A: The Beneficiary Information Form (also known as the BIF) was designed to allow users to complete a portion of the form and, if necessary, save the progress they made. After clicking on the "Save" button, you will receive an email with a link to the form so you can complete the form at a later time. Users will also be receiving a list of the information that will be requested on the form so they can gather it prior to completion of the form online. **NOTE:** Downloaded documents cannot be saved until the form is completed. Downloaded documents (W-9, Vendor Profile form, Budget and Municipal Contract/Correspondence if applicable) should be downloaded with the final submission.

Q: The BIF isn't allowing me to upload my documents. I cannot submit the whole form until these documents are uploaded.

A: Please note that all uploaded documents MUST be in a PDF (Portable Document Format). No word, excel, jpeg or other kinds of documents will be accepted. Please refer to instructions provided separately as to how to convert certain kinds of documents into a PDF. If you continue to have difficulty converting documents to a PDF after reading the instructions and engaging your own IT support, please reach out to the SUA at stateunitonaging@ct.gov.

Q: While I'm in the form, when I click on "back" or "next" it's not bringing me to the previous/next page; what can I do to make this work?

A: You may have to click "back" or "next" buttons several times to get to the either previous or next page as you move throughout the BIF. This is OK and will be necessary at times to move forward and to eventually submit the form.

Q: Will there be an opportunity to ask questions regarding the project and/or the form?

A1: There are two virtual information sessions that have been scheduled in April 2023. Future Beneficiaries are encouraged to send a representative to one. Sessions will be recorded so if a representative is not able to attend, Beneficiaries may request a recording be sent to them via email. During the session, SUA staff will not only provide a brief overview of the funding opportunity but will also walk through the Beneficiary Information Form (BIF) and will answer general questions pertaining to the project and process.

A2: Any specific questions pertaining to this ARPA funding project must be directed to stateunitonaging@ct.gov. This email is monitored on business days and answers will either be provided directly, or a virtual technical assistance session can be scheduled if necessary between SUA staff and Beneficiaries. Please do not call or email any individual SUA program staff with questions; only use the stateunitonaging@ct.gov email.

Q: How will we receive updates about the ARPA Senior Center funding project?

A: Once a Beneficiary submits their BIF, SUA staff will communicate solely with the identified individual for that entity. If the SUA needs to send out any general communications regarding the ARPA Senior Center funding project, this will be done via email to both Municipal Leadership and Senior Center Leadership, similarly to communications that have previously been sent out regarding this opportunity.

Q: How does our municipal or senior center Representative register for an Information Session?

A: Registration is not necessary. Dates and respective links for Information Sessions are below:

Friday, April 21, 2023
9:30-11:00AM

Join on your computer, mobile app or room device
Click here to join the meeting
Meeting ID: 244 129 226 315
Passcode: SkhGwg
Download Teams | Join on the web
Or call in (audio only)
+1 860-840-2075,,131451817# United States, Hartford
Phone Conference ID: 131 451 817#

Wednesday, April 26, 2023
2:00-3:30PM

Join on your computer, mobile app or room device
Click here to join the meeting
Meeting ID: 272 700 739 659
Passcode: sZdjDz
Download Teams | Join on the web
Or call in (audio only)
+1 860-840-2075,,652929719# United States, Hartford
Phone Conference ID: 652 929 719#