

I. Introduction

The following narrative and supporting schedules represent the public assistance cost allocation plan (PCAP) for the State of Vermont, Agency of Human Services (AHS), Department of Aging and Independent Living (DAIL). DAIL is responsible for administering Title III funded programming, Section 110 programming and developmental disabilities case management services for the State of Vermont.

DAIL Mission Statement

The Department of Aging and Independent Living is the center of the Agency of Human Services' program management and policy development with respect to older persons and persons with disabilities. The Department has the following goals:

- Assist older persons and adults with physical disabilities to live as independently as possible.
- Assist persons with disabilities to find and maintain meaningful employment.
- Assure quality of care and life to individuals receiving health care and/or long term care services from licensed or certified health care providers and protect elderly and disabled adults from abuse, neglect and exploitation.

Within this document, we have included an overview of DAIL's organizational structure and a list of the specific functions performed by DAIL, referred to as plan departments or cost pools, and the allocation method for each function.

II. Organization

The major programs at DAIL are organized under the following divisions:

Division of Advocacy and Independent Living - These activities center around developing, overseeing and enabling access to a system of services which assist older persons and persons with disabilities to live as independently as is possible. Includes overseeing a variety of services, such as nutrition, attendant care, homemaker, adult day, respite, transportation, benefits counseling, advocacy, service coordination, information and referral, and, and legal assistance.

Blind and Visually Impaired - These activities offer a wide range of vocational, independent living, social and advocacy services to individuals who are blind or visually impaired.

Vocational Rehabilitation - These activities are designed to assist persons with disabilities to obtain or maintain employment or independence consistent with their interests and abilities.

Licensing and Protection - These activities include the regulation of a variety of health care and residential facilities, and investigating adult abuse and/or neglect.

Developmental Disabilities - Helps children and adults with developmental disabilities and children with health impairments and/or physical disabilities to live as independently as possible within their family, home and community, acting as the appointed (public) guardian for some persons age 60 and over.

III. Plan Departments and Allocation Methodologies

Plan Department 1:

State Wide Indirect Cost Allocation Plan (SWICAP)

Nature and Extent of Services: The State of Vermont, Agency of Human Services, negotiates the annual State Wide Indirect Cost Allocation Plan (SWICAP) with the Federal Government. The approved statewide indirect costs applicable to DAIL are included in the CAP and allocated to the appropriate benefiting objectives.

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|------------------------------|--|--|
| | SWICAP | DAIL Allocation of State Wide Indirect Costs | Salary Dollar less Attendant Services Salaries (for SWICAP) (Department level indirect costs, Statewide costs (including Single Audit), and Agency costs are allocated to each division based on their share of Department wide salary costs excluding the Attendant Service Program salaries.) |
| | AHS Indirect Cost | DAIL Allocation of State Wide Indirect Costs | Salary Dollar less Attendant Services Salaries (for SWICAP) |
| | Department Administration | DAIL Allocation of State Wide Indirect Costs | Salary Dollar less Attendant Services Salaries (for SWICAP) |
| | Single State Audit (37200) | DAIL Allocation of State Wide Indirect Costs | Salary Dollar less Attendant Services Salaries (for SWICAP) |
| | Human Services Board (37220) | DAIL Allocation of State Wide Indirect Costs | Salary Dollar less Attendant Services Salaries (for SWICAP) |

Plan Department 2:

Division of Advocacy and Independent Living

Nature and Extent of Services: The Division of Advocacy and Independent Living develops, oversees and enables access to a system of services which assist older persons and persons with disabilities to live as independently as is possible. Its responsibilities include overseeing a variety of services, such as nutrition, attendant care, homemaker, adult day, respite, transportation, benefits counseling, advocacy, service coordination, information and referral, and legal assistance.

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|--|--|--|
| | DAIL Managers (43030) | Managers in the Division of Advocacy and Independent Living | Percent of Salary Dollars Directly Charged (DAIL) (Managers' salaries, fringe, and operating expenses will be aggregated and allocated to all direct program charges in the quarter based upon an aggregate percentage of salary dollars directly charged.) |
| | DAIL Division Director and Support Staff | Expenses associated with the Division Director and Administrative Staff who have broad responsibilities for programs operated within the division. | Ratio of Total Direct Program Funds Expended in Quarter (DAIL) (Cost of staff and associated operating that oversee grants programs are allocated on the ratio of total direct program funds expended in the quarter.) |

Plan Department 2:

Division of Advocacy and Independent Living (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|------------------------------------|---|---|
| | Medicaid Administration (37700) | Staff and related expenses for administering Vermont's Home & Community Based Waivers under Section 1915(c) of the Social Security Act and other Medicaid State Plan Services. Includes grant payments to Designated Agencies at local level for Administration of HCB waiver and grant payments to Area Agencies on Aging for Medicaid outreach to elders. | Direct to Medicaid Admin 50% |
| | Attendant Services Program (43050) | Staff and expenses related to administering the Attendant Services Program, a program providing attendants to elderly persons and persons with disabilities who manage their own care. | Persons Served in Quarter By DAIL (Allocated among OAA, General Fund, and Title XIX based upon the persons served in the quarter.) |
| | Case Management (43060) | State staff time and expenses related to training program for case managers. Recipients of training are staff from the Area Agencies on Aging and Home Health Agencies. | Direct to Older Americans Act and Title XIX |

Plan Department 2:

Division of Advocacy and Independent Living (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|---|---|
| | State Health Insurance Program (43570) | Area Agencies on Aging provide outreach and assistance to Medicare beneficiaries. | Direct to State Health Insurance Program |
| | Senior Farmers Market (43980) | Food Coupons to Seniors for use at Farmer's Markets | Direct to Senior Farmers Market |
| | Robert Wood Johnson (43810) | Private Grant for housing related expenses | Direct to Robert Wood Johnson |
| | Commodities Supplemental Food Program (39727) | Delivery of Commodities to primarily Seniors | Direct to Commodities Supplemental Food Program |
| | DDHS Real Choices Grant (43950) | System Change Grant related to services for elders and persons with disabilities | Direct to DDHS Real Choices Grant |
| | Elderly & Disabled Transportation (43992) | Expenses related to a federal transportation grant | Direct to Elderly & Disabled Transportation |
| | CDC Grant (43990) | Federal grant related to improving medical services for persons with disabilities | Direct to CDC Grant |
| | Dementia Grant (43520) | Federal related to services to families with dementia | Direct to Dementia Grant |
| | Senior Community Service Employment Program (43991) | Federal Grant related to employment services for elders | Direct to Senior Community Service Employment Program |
| | Older American's Act Grant (43930) | Grants for elders primarily to Area Agencies on Aging | Direct to Older American's Act Grant |

Plan Department 2:

Division of Advocacy and Independent Living (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|--|--|
| | State Plan Administration & Admin on Aging Congregate Meals III-C-1 (43531) | Activities related to administering OAA programs | Direct to Admin on Aging Congregate Meals III-C-1 |
| | Social Services Block Grant (37800) | Portion of Adult Day Grants charged to SSBG | Direct to Social Services Block Grant |
| | Medicaid Program (37710) | Expenses for Adult Day and ASP Personal Care | Direct to Medicaid Program |
| | Admin on Aging Support Services (III-B) (43530) | | Direct to Admin on Aging Support Services (III-B) |
| | AAA Home Delivered Meals (III-C-2) (43532) | | Direct to AAA Delivered Meals III-C-2 |
| | National Family Care Supplemental (III-E) (43890) | | Direct to Admin on Aging National Family Care Supplemental III-E |
| | Ombudsman Title VII-E (43536) | | Direct to Older American's Act |
| | AAA Abuse Prevention (III-D) (43535) | | Direct to Admin on Aging Abuse Prevention III-D |
| | NSIP (43590) | | Direct to NSIP Grant |
| | Energy (43610) | | Direct to Energy Outreach Grant |
| | Food and Nutrition Services (43600) | Food stamp outreach | Direct to Food and Nutrition Services |
| | DAIL Transportation –Adult Day Centers (43820) | | Direct to State General Fund |

Plan Department 2:

Division of Advocacy and Independent Living (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|---|--|
| | AAA General Fund-Transportation (43550) | | Direct to Older American's Grant |
| | AAA Preventative Health (43534) | | Direct to Admin on Aging Preventative Health (43534) |
| | General Fund (43500) | Programs that are entirely State funded | Direct to State General Fund |

Plan Department 3:

Division for the Blind and Visually Impaired

Nature and Extent of Services: The Division for the Blind and Visually Impaired offers a wide range of vocational, independent living, social and advocacy services to individuals who are blind or visually impaired.

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|---|---|
| | Division Director and Staff | Expenses associated with the Division Director, the Casework Supervisor and Administrative Secretary who have broad responsibilities for programs operated within the division. | Ratio of Total Direct Program Funds Expended in Quarter (Blind and Visually Impaired) (Cost of staff and associated operating that oversee grants programs are allocated on the ratio of total direct program funds expended during the quarter. This treatment allocates a share of indirect cost to all benefiting grant programs, regardless of whether the individual grant actually provides funding for this indirect cost.) |
| | Rehabilitation Training Grant (43640) | Staff Training Grant | Direct to Rehab Training Grant |
| | Mobile Low Vision Grant (43630) | Grant for elders with low vision | Direct to Mobile Low Vision Grant |
| | Title VI-C (43660) | Supported Employment services | Direct to Title VI-C |
| | Independent Living Part B (43620) | | Direct to Independent Living Grant (Blind) |
| | Section 110 (Blind and Visually Impaired) (43650) | | Direct to Section 110 (Blind) |
| | Vending & Other (43680) | | Direct to Vending & Other |
| | General Fund (43500) | State funded programs | Direct to State General Fund |

Plan Department 4:

Division of Vocational Rehabilitation

Nature and Extent of Services: The Division of Vocational Rehabilitation assists persons with disabilities to obtain or maintain employment or independence consistent with their interests and abilities.

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|--|--|--|
| | Division Director and Staff | Expenses associated with the Division Director, the Program Services Chief, Rehabilitation Coordinator, Systems Developer II, Administrative Secretary, and clerical support staff who have broad responsibilities for programs operated within the division. | Ratio of Total Direct Program Funds Expended in Quarter (Voc Rehab) (Cost of staff and associated operating that oversee grants programs are allocated on the ratio of total direct program funds expended. This treatment allocates a share of indirect cost to all benefiting grant programs, regardless of whether the individual grant actually provides funding for this indirect cost.) |
| | Regional Support Staff and General Operating Costs (43290) | Expenses incurred by the regional and district offices that support all activities within the region. This includes regional manager salaries and expenses; support staff salaries and expenses; and operating bills not directly attributable to an activity. | Ratio of Total Direct Program Funds Expended in Quarter by Regional Staff (Voc Rehab) (Statewide VR Regional managers, support staff, and operating expenses will be allocated based upon the percentage of statewide regional office personal services and operating direct charged expenses charged to activities.) |
| | Industrial Homework (43280) | Expenses associated with the industrial homework program. | Persons Served in Quarter by Voc Rehab (Allocated between 110 program and State program by the number of persons served in the quarter in each program.) |

Plan Department 4:

Division of Vocational Rehabilitation (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|--|---|---|
| | Assistive Technology Grant (43690) | Federal Grant to help consumers receive information pertaining to assistive Technology and system changes | Direct to Assistive Technology Grant |
| | Medicaid Administration | Salary and Expenses related to implementation of the TBI HCB Waiver | Direct to Medicaid Admin 50% |
| | Rehabilitation Training Grant (43760) | Staff Training Grant | Direct to Rehab Training Grant |
| | Title VI-C (43700) | Direct expenses related to Supported Employment Grant | Direct to Title VI-C |
| | Medicaid Infrastructure Grant (43900) | Direct expenses related to the Grant | Direct to Medicaid Infrastructure Grant |
| | TBI Planning Grant (43960) | Direct expenses related to the Grant | Direct to TBI Planning Grant |
| | Voc Rehab Independent Living Grant (43750) | Direct expenses related to the Grant | Direct to Independent Living Grant (VR) |
| | RSA System Change Grant (43940) | Direct expenses related to the Grant | Direct to RSA System Change Grant |
| | DET Grant (43910) | Direct expenses related to the Grant | Direct to DET Grant |
| | Medicaid Program (37710) | TBI Waiver expenses | Direct to Medicaid Program |
| | Section 110 (Voc Rehab) (43770) | | Direct to Section 110 (Voc Rehab) |
| | Counseling & Assistance (43720) | | Direct to Counseling & Assistance |
| | Supported Employment Title VI-B (43730) | | Direct to Supported Employment Title VI-B |
| | Welfare to Work (43790) | | Direct to Welfare to Work |
| | DRI Partnership New Paradigm (43994) | | Direct to DRI Partnership New Paradigm |
| | General Fund (43500) | Programs that are entirely State funded | Direct to State General Fund |

Plan Department 5:

Division of Licensing and Protection

Nature and Extent of Services: The Division of Licensing and Protection regulates a variety of health care and residential facilities, and investigates adult abuse and/or neglect.

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|---|---|
| | Director and SEC Support (43070) | Expenses for the Division director and secretarial support that support entire division. | Salary & Expenses in Quarter – Director of Division of Licensing and Protection (Time and expenses of Director and secretarial support for the Division are allocated to all division programs based on salary and expenses in the quarter.) |
| | Long Term Care Licensure Support (43080) | Expenses for Health and Long Term Care Facilities Licensing Chief and administrative time of staff in the long term care health facilities section of the division. | Salary and Expenses in Quarter – Licensure (The cost of supervision and support of licensing and Protection is allocated to all facilities licensing programs based on salary and expenses in the quarter.) |
| | Long Term Care Vacations, Training and Other Time (43090) | Expenses for licensing staff vacations leave time, training time and other administrative time that is not directly charged to a survey. | Salary and Expenses in Quarter – Long Term Care Vacations, Training and Other Time (The cost of LTC administrative time is allocated to all facilities licensing programs based direct staff time in the quarter.) |

Plan Department 5:

Division of Licensing and Protection (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|--|--|
| | Adult Protective Services (43170) | State staff who investigate reports of abuse, neglect and exploitation of elders and persons with disabilities. | Direct to State General Funds |
| | Nurse Aid Training and Competency (NATAC) (43350) | Costs incurred in the administration of competency tests and skills tests to nurse aides as required by federal regulations. | Allocation between Title XIX, and State funds (for NATAC training) |
| | NATAC Registry and Administration | Costs incurred in the administration of federally mandated nurse aide training and competency program and maintenance of registry. | Allocation between XVIII and XIX based on Certified and Participating Facilities (for NATAC Admin) (Expenditures for administration and Nurse Aid Registry are allocated to the Medicare portion of Survey and Certification and Medicaid Administration based on the number of participating facilities certified for Medicare and Medicaid programs.) |
| | Certification of Home Health Agencies (43120) | Cost incurred in the survey of Vermont Home Health Agencies and Hospice programs to ensure compliance with all federal regulations related to HHA and Hospice. | Direct to Medicare (XVIII Funds) |

Plan Department 5:

Division of Licensing and Protection (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|--|---|
| | Non-Certified Health Care Facilities (43130) | Expenses incurred in the surveys, follow-up visits, and complaint investigations occurring in nursing homes that are state licensed, but not federally certified. | Direct to State General Funds |
| | Hospital XVIII Non Licensed HC Facilities (43140) | Expenses incurred in the surveys of Outpatient Rehabilitation Facilities; End State Renal Dialysis Units; Rural Health Centers; Outpatient P.T.; Outpatient S.T., Independent Physical Therapists; and the Medicare-certified portion of Vermont State Hospital. | Direct to Title XVIII Non Licensed HCF |
| | Hospital XVIII Licensed HC Facilities (43150) | Expenses incurred in the performance of validation surveys, and substantial allegation surveys in hospitals as directly by CMS. Includes enforcement of federal regulations in psychiatric hospitals, psychiatric units of hospitals, rehabilitation units of hospitals, and swing beds. | Direct to Title XVIII Licensed HCF |
| | Licensure of Nursing Facilities (43170) | Expenses incurred in the surveys, follow-up visits, and complaint investigations occurring in nursing facilities that are federally certified for participation in the Medicare/Medicaid program. | Allocation between XVIII, XIX, and State based on Homes Certification per Surveys and Certification Policies (for Nursing Homes). |

Plan Department 5:

Division of Licensing and Protection (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---------------------------------------|--|--|
| | ICF/MRs (43190) | Expenses incurred in the enforcement of federal ICF/MR requirements. | Allocation between XIX and State for ICF/MRs |
| | Level III Licensed Facilities (43210) | Expenses incurred in the review and enforcement of state licensure and federal requirements related to facilities providing Assistive Community Care Services. | Number of ACCS Beds Paid by Title XIX Billed by 15 th /Total ACCS Beds on 15 th (Allocated between Title XIX and State using # ACCS beds billed Medicaid for qtr by 15th of month divided by total # ACCS beds on 15th of month beginning quarter.) |
| | State Licensure | Expenses incurred in the enforcement of State licensure requirements in Level III residential care facilities that do not provide Assistive Community Care Services; Level IV residential care facilities; assisted living facilities; and therapeutic community residences. | Direct to State General Funds |
| | Home Health Hotline (43330) | Costs for operating the Home Health Hotline. | Direct to Medicare (XVIII Funds) |
| | Baseline Validation (43220) | Expenses incurred in the site visits to nursing facilities to verify the accuracy of the information provided the Federally mandated MDS+ forms. | Direct to Medicaid Program |

Plan Department 5:

Division of Licensing and Protection (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|--|---|---|
| | Prior Authorization Program (SPMP) | Expenses incurred in the review of the medical necessity of all nursing facility admissions of Medicaid/Medicaid applied individuals. | Direct to Medicaid Adm 75% |
| | Health Care Facilities Train Nurse Fac (43320) | Covers expenses incurred by staff in attending in-services, conferences, and workshops related to the enforcement of federal regulations in certified facilities. | Direct to Title XVIII |
| | Clinical Laboratory Cer. and Insp. (43310) | Costs incurred in the enforcement of federal regulations in federally certified clinical laboratories. | Direct to Clin Lab Cert and Insp |
| | Outcome and Assess. Info Set (OASIS) (43250) | Cost associated with administration of the federally mandated home health agency Outcome and Assessment Information Set. | Direct to Medicare (XVIII Funds) |
| | Minimum Data Set (MDS) (43270) | Cost associated with information technology and reporting associated with the administration of the federally mandated nursing home Minimum Data Set. | Allocation between XVIII, XIX, and State based on Surveys and Certification (for Nursing Homes) (Costs are allocated in accordance with survey and certification procedure based on the licensure of nursing homes.) |

Plan Department 5:

Division of Licensing and Protection (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|---|--|
| | LTC Engineering (43100) | Expenses for staff of the Division of Labor and Industry that work with the Survey and Certification staff on the licensure of facilities. Also, includes costs for architectural, engineering, and other consultants necessary for facilities licensing. | Costs for Buildings/Programs Requiring Inspections |
| | Clinical Lab Improvement Act (CLIA) (43110) | | Direct to State General Fund |
| | Assisted Living (43360) | | Direct to Assisted Living |
| | LTC Multi (43170) | | Direct to LTC Multi |
| | Community Care Homes (CCH) (43200) | | Direct to CCH |
| | Enhanced Residential Care (43240) | | Direct to Enhanced Residential |
| | Nursing Home Complaints | | Direct to Nursing Home Complaints |
| | General Fund (43500) | Programs that are entirely State funded | Direct to State General Fund |

Plan Department 6:

Division of Developmental Disabilities

Nature and Extent of Services: The Division of Developmental Disabilities helps children and adults with developmental disabilities and children with health impairments and/or physical disabilities to live as independently as possible within their family, home and community.

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|---|--|--|
| | Division Director (43070) | Director of the Division of Developmental Services, Administrative Assistant, and Program Development Policy Analyst | Ratio of Total Direct Program Funds Expended in Quarter (Division of Developmental Disabilities) (Cost of staff and associated operating that oversee grants programs are allocated on the ratio of total direct program funds expended in the quarter. This treatment allocates a share of indirect cost to all benefiting grant programs, regardless of whether the individual grant actually provides funding for this indirect cost.) |
| | Guardianship Services Chief (43510) | Chief of Guardianship Services and Administrative Assistant | Allocated by Salary Dollars of Staff Supported by Guardianship Services Chief |
| | Senior Guardianship Specialists | Provide Guardianship services to the eligible senior population | Direct to SSBG |
| | Guardianship Services Specialists (42011) | Provide Guardianship services to the eligible developmentally disabled population | Direct to DS Guardianship |

Plan Department 6:

Division of Developmental Disabilities (Continued)

| Plan Dept. | Plan Dept. Name | Description | Allocation Method |
|-------------------|--|--|---|
| | Clinical and Children's Services Manager (43580) | Manager of the Clinical and Children's Services Unit and Administrative Assistant | Allocated by Percentage of Salary Costs of Independent Living Services Consultant Personal Care and Nurse Case Manager High-Tech Services |
| | Independent Living Services Consultant Personal Care | Independent Living Services Consultant Personal Care under the Manager of Clinical and Children's Services | Direct to Medicaid Program |
| | Nurse Case Manager High-Tech Services | Independent Living Services Consultant Personal Care under the Manager of Clinical and Children's Services under the Manager of Clinical and Children's Services | Direct to Medicaid Admin 75% |
| | Developmental Services Operations Director (43710) | Developmental Services Operations Director and Administrative Assistant | Allocated by Salary Dollars of Staff Supported by DD Operations Director |
| | Developmental Services | Developmental Services Team Leader and supported CAS | Direct to Medicaid Admin 50% |
| | Consumer Development Coordinator | Costs associated with coordination of consumer development activities | Direct to State General Fund |
| | Sex Offender Management Grant (42026) | Costs associated with Sex Offender Grant | Direct to Sex Offender Management Grant |
| | General Fund (43500) | Programs that are entirely State funded | Direct to State General Fund |