

December 5, 2022

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 22-96**

The purpose of this All County Letter is to provide guidance on the disbursement and spending parameters of the \$16,437,221 California Adult Protective Services (APS) has received from the federal Administration for Community Living as part of the second round of funding from the American Rescue Plan Act of 2021: Grants to Enhance APS. The funds are designed to enhance and improve APS by supplementing existing APS programs as well as continuing the efforts bolstered by the earlier grant designed to address COVID-19 demands.



**KIM JOHNSON**  
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



**GAVIN NEWSOM**  
GOVERNOR

December 5, 2022

ALL COUNTY LETTER NO. 22-96

TO: ALL COUNTY WELFARE DIRECTORS  
ALL COUNTY ADULT PROTECTIVE SERVICES MANAGERS

SUBJECT: **GUIDANCE REGARDING THE DISBURSEMENT OF AMERICAN RESCUE PLAN ACT OF 2021: SECOND ROUND OF GRANTS TO ENHANCE ADULT PROTECTIVE SERVICES FUNDS TO COUNTY ADULT PROTECTIVE SERVICES AGENCIES**

REFERENCE: [Federal Register 2022-11175; ACL NO. 21-43; ACL NO. 21-84; ACL NO. 22-07; CFL NO. 21/22-87](#)

The purpose of this All County Letter (ACL) is to provide guidance on the disbursement and spending parameters of the funding opportunity provided by the Administration for Community Living, in accordance with Section 2042(b) of Subtitle B of Title XX of the Social Security Act, otherwise known as the Elder Justice Act, as authorized and funded through the American Rescue Plan Act (ARPA) of 2021. California's Adult Protective Services (APS) program has received a second supplemental grant in the amount of \$16,437,221 (ARPA Round 2). Funds from this second grant will be allocated to counties in a forthcoming County Fiscal Letter (CFL) based on APS reports received and open cases.

### **BACKGROUND**

The American Rescue Plan Act of 2021: Grants to Enhance Adult Protective Services was established under authority of the Elder Justice Act Section 2042(b) of Title XX of the Social Security Act. In accordance with these statutes, the purpose of this appropriation is to enhance, improve, and expand protective services provided by APS in the investigation and remediation of instances of abuse, neglect, and exploitation. This second award, totaling \$163,646,000, is a supplement to the initial ARPA grant of \$86,060,000 released in August 2021, making the total amount of federal ARPA funds available for states to be approximately \$249,706,000. Of that amount, California's total award for the two grants will be \$25,124,535, which equates to a little more than ten percent of the total federal grant.

For the ARPA Round 2 grant, the determined spending breakdown is as follows:

- **\$13,922,221** will be distributed directly to county APS programs. County allocations will be included in a forthcoming CFL and based on APS reports received and open cases.
- **\$1,600,000** to contract with Weill Medical College (WMC) of Cornell University to train APS supervisors and social workers on using the Interview for Decisional Abilities (IDA) tool. The IDA is designed to assist county APS workers to accurately capture their clients' general understanding and personal appreciation of risk as well as the ability to make reasoned decisions about potential service options. The IDA promotes communication and consistency between APS supervisors, social workers, and referring professionals about cases requiring decision-making assessments.
- **\$306,300** to contract with the three state Regional Training Academies (RTAs) to facilitate the scheduling of the IDA training with the counties within their respective regions. While WMC of Cornell University will be responsible for the administration of the training, its oversight and completion accreditation, the RTAs will be serving as the regional organizers, schedulers, and constructors of the IDA training cohorts. They will partner with WMC of Cornell University to roll out the training over a two-year period.
- **\$233,700** to contract with EverSafe to purchase HelpVul, a web-based, secure financial abuse reporting platform built to increase efficiency with case investigations and facilitate collaboration between financial institutions and local county APS offices. Financial institutions will then be able to refer financial abuse cases to APS county offices through HelpVul in a more efficient manner.
- **\$375,000** to contract with Purdue University to conduct an evaluation study on how counties spent their ARPA allocation and the impact it had on effectively intervening and reducing risk for the elder and dependent adult population. This study will provide additional insight into the effectiveness of selected strategies in not only the intervention and reduction of risk for reported abuse cases, but how effective strategies bolster APS's place in the community as well.

The particulars of the application process were outlined in Federal Register 2022-11175 referenced above. The California Department of Social Services (CDSS) has submitted to the federal Administration for Community Living the required Letter of Assurance, which promises that California will adhere to the restrictions and parameters guiding the receipt and use of the funds. The initial spending plan submitted upon the ARPA Round 1 award outlining the categories in which California counties will be asked to utilize the grant money remains in effect.

## **COUNTY APPROPRIATION SPENDING PARAMETERS**

Counties may use these funds to continue activities initiated through the Coronavirus Response and Relief Supplemental Appropriations Act of 2021, as directed in [ACL NO. 21-43](#) and [ACL NO. 21-84](#), and continued, or started, with the ARPA Round 1 funding, as guided in [ACL NO. 22-07](#). As was the case with ARPA Round 1, this round of funding may also be used for any allowable APS activities and claimed consistent with guidance provided in County Fiscal Letter [\(CFL\) NO. 21/22-87](#). The federal administration continues to encourage the establishment and/or enhancement of shelters for elders and dependent adults, as well as short-term housing options along with relevant wraparound services. The administration also encourages the development and expansion of elder justice networks, improved cooperation and partnerships with tribal APS, improving reporting and intake processes, continued remote work development and technology acquisition, and funding for extended case management, and staff hiring.

The allocation may be used to serve any APS client who meets eligibility requirements. This funding must supplement and not supplant existing funding for APS provided by state and local units of government. In August 2022, Administration for Community Living informed all ARPA grantees that both rounds of ARPA funding are available for use between August 1, 2022 and September 30, 2024.

The CDSS will be required to submit semi-annual federal financial reports and annual program reports related to the activities performed. The CDSS will periodically reach out to counties to collect data and other information about how the funds are being spent in order to meet the federal reporting requirements.

## **SPENDING CATEGORIES**

Each county will receive a calculated amount based on their percentage of the state's APS caseload. While maximum flexibility is afforded the counties in determining how they will spend the funds, counties are advised to exercise judgement consistent with the Elder Justice Act Section 2042(b); Section 9301 of the ARPA of 2021; and guidance provided by the federal Administration for Community Living. Examples of how to spend the allocation noted in the Federal Register Notice include:

- Establishing or enhancing the availability for elder shelters and other emergency, short-term housing and accompanying "wraparound" services
- Establishing, expanding, or enhancing state-wide and local-level elder justice networks
- Working with tribal APS efforts

- Improving or enhancing existing APS processes
- Improving and supporting remote work
- Improving data collection and reporting at the case worker, local, and state levels in a manner that is consistent with the National Adult Maltreatment Reporting System
- Establishing new, or improving existing processes for responding to alleged scams and frauds
- Community outreach
- Providing goods and services to APS clients
- Acquiring personal protection equipment and supplies
- Paying for extended hours/overtime for staff, hiring temporary staff, and associated personnel costs
- Training
- Assisting APS clients secure the least restrictive option for emergency or alternative housing, and with obtaining, providing, or coordinating with care transitions as appropriate.

### **TECHNOLOGY PURCHASES**

If counties choose to use all or part of their funding allocation to purchase computer hardware, software, or other technology for staff or clients, the following procedures must be followed. The State maintains a zero-dollar threshold for requiring prior written approval for all Electronic Data Processing (EDP) expenditures. To comply with state and federal regulations in the [CDSS Manual of Policies and Procedures Division 28](#), the [Code of Federal Regulations \(CFR\) Part 95](#), and [2 CFR 200.1](#), CDSS has an already-established process for state review and approval of county EDP expenditures through the submission of Advance Planning Documents (APDs).

Pursuant to [All County Information Notice No. I-68-07](#), all EDP expenditures, regardless of cost, require an APD approval. To determine if a purchase meets the definition of EDP, please refer to the definitions provided in the [Is An APD Necessary Checklist](#). All APD resource documents developed to assist counties in preparing APDs are available on the [Office of Systems Integration's](#) (OSI) website.

For an EDP expenditure that will solely benefit APS, the county should complete a Statewide Automated Welfare Systems (SAWS)/Generic APD. Counties should identify “APS ARPA” as the benefiting program on all APD documents submitted to OSI for EDP expenditures related to this funding opportunity. Counties should submit all SAWS/Generic APD documents to OSI at [project.approvals@osi.ca.gov](mailto:project.approvals@osi.ca.gov) for approval before making any EDP expenditures, with a copy to Sudakshina Biswas at [Sudakshina.Biswas@osi.ca.gov](mailto:Sudakshina.Biswas@osi.ca.gov).

Under these guidelines, EDP expenditures should not be made until the county has received approval from OSI. Counties should anticipate this process taking approximately 30 days unless revisions or additional information are required. Once approval is received, your county may then follow its own procurement policies for the purchases.

### **PURCHASES OVER \$5,000**

For any ARPA purchases over \$5,000, counties must complete a large purchase request form in order to receive spending approval. Counties shall submit the large purchase request form to the CDSS APS Unit inbox at [aps@dss.ca.gov](mailto:aps@dss.ca.gov). Counties may request a large purchase request form from the same email address.

For counties that plan to make a technology purchase over \$5,000, an APD must first be submitted to OSI, as described above, and a large purchase request form must then be submitted to the CDSS APS Unit.

Under these guidelines, purchases over \$5,000 should not be made until the county has received approval the CDSS APS Unit. Counties should anticipate this process taking approximately 30 days unless revisions or additional information are required. Once approval is received, your county may then follow its own procurement policies for the purchases.

### **SPENDING PLANS**

While maximum flexibility has been afforded the counties in determining how they will spend the funds, counties are encouraged to provide CDSS an overview of how they intend to use the allocation. The spending plans do not need to include the amount committed to the various areas outlined in this ACL, only descriptions of how the funds are being used to bolster APS service areas. Spending plans should be submitted via email to [aps@dss.ca.gov](mailto:aps@dss.ca.gov).

All County Letter No. 22-96  
Page Six

If you have any questions or need additional guidance regarding the information in this letter, the CDSS APS Unit at (916) 651-5931 or at [aps@dss.ca.gov](mailto:aps@dss.ca.gov).

Sincerely,

***Original Document Signed By***

LEORA FILOSENA, P.M.P.  
Deputy Director  
Adult Programs Division