Compliance is a never ending and never forgiving responsibility. One mistake out of thousands of transactions can get you an audit finding. It is right or it is wrong. Period.

In this reality, and with our goal of 100% compliance, we can feel like all the control processes, and knowledge base, and oversight in place is not enough; even while our efforts are greater today than they were the day, week, or year before. Our division operates over 30 different grant, housing and social services programs, and oversees dozens of open contracts. We have a myriad of projects with differing and nuanced compliance requirements. Some will make your head spin. Like, in the HOME program, “nominally, all tenants must be at or < 80% AMI; but Program-wide Income Targeting requires that 90% of rental families be at or < 60% AMI; and in projects with 5 or more HOME assisted units, 20% of the units must be occupied by families at or below 50% AMI.” And, if that is not hard enough to follow you have to know that for ESG; all renters’ incomes must be below 30% AMI, but for the SHIP program income can go up to 120% AMI.

If you are still reading, would you like a job?

On behalf of the County, CHS owes compliance to multiple federal and state regulators such as HUD, DOJ, DCF, DOEA, DEO, FHC and FHFC (for acronym translations, please call). And, internally, we need to be compliant with requirements of the Growth Management Plan and LDC, a host of ordinances, the County’s Office of Management Budget Grant Unit and the County’s Clerk of Courts.

You take the money, you operate the program, you accept the compliance responsibility. Here in CHS we take that responsibility very seriously.

As shown to the right, our CHS organization has a nested, systematic oversight model and is designed to help us achieve 100% compliance. Our staff members are continuously trained on the programs and regulations, and we have developed and maintain processes that inherently foster compliance. We developed a monitoring and compliance unit within CHS that is responsible for subrecipient monitorings, preparation for grantor/funder monitorings, compliant agreement development, policies and procedures, and compliance training. We have rigorous internal controls on all financial elements that are established and overseen by the County OMB grant unit. All grant disbursements are audited by the Clerk of Courts with a pre-audit sampling rate of 100%. The procurement division and the...
Growth Management Department also check our compliance, among others. Often, the ultimate report card on compliance is provided by the funder or grantor once our program and financial compliance is reported on and reviewed. We have a track record of receiving good report cards.

This newsletter issue is to give well-deserved exposure to some of the methods and approaches we take to ensure we, and, our partners and subrecipients work together to assure our programs are not only serving those who are eligible, but being achieved with high levels of integrity and compliance.

Yes, compliance is never ending and never forgiving. But, we do what we must do because it matters to the people we serve. And, we give it 100%. Because it is that important. Period.

Serving Compliance

“Hmmm, that looks odd!” is a phrase you often hear in the Grants Compliance Unit (GCU) when a staff member is reviewing files or preparing for a monitoring visit. Next comes the research to determine whether the “weird” item is supported by regulations and documentation. And, usually, the result of the research or the eventual monitoring visit confirms that all is well and within compliance. And, on the occasion when all is not well, well, you will hear “let’s work together to find a solution.”

The GCU team is here to serve, and uses monitoring, group training and individualized technical assistance to aid grant program participants to improve their project performance, develop or increase capacity and augment their grant management and technical skills. Plus, the team is always on the lookout for ways to eliminate fraud, waste and abuse.

We are a team of four seasoned professionals tasked with ensuring that both federally and non-federally funded programs administered by Collier County Community and Human Services Division are carried out in compliance with applicable laws and program regulations. The team is comprised of an Operations Analyst (Program), Senior Accountant (Fiscal), Operations Coordinator (Administration) and Grants Compliance Supervisor (Team Lead).

The GCU is involved in assuring compliance throughout the life cycle of grant and contract administration, beginning with an analysis of the financial status and capacity of prospective grantees, prior to award of grant funds. We make sure the grant agreement templates (contracts) are updated annually to ensure compliance with grantor and local regulations, and we research compliance questions and advise on implications of revised regulations. And, our work does not end when the grants end, instead we monitor the projects until all obligations have been met (usually at least five years, as many as 20 years).

Outside the grant life cycle, the GCU maintains responsibility for policies and procedures for all grant programs, fields questions from external auditors, and coordinates and staffs on site visits when CHS is monitored by a grantor/funding agency.

We operate under the philosophy that compliance is not just about the rules, but about people, too. The investment we make in working with our partners early and often is the best way to ensure compliance in the long run. Serving compliance - “Hmmm, that’s about right.”

Cynthia Kemner, Supervisor, Grants Compliance Unit
Annual Homestead Monitoring

We are delighted to be able to provide grants to the community, however, it is not a one-way street. The vast majority of grant recipients are required to follow certain ongoing guidelines. The Community and Human Services GCU provides monitoring of various programs on a post-closeout, annual basis. Programs are monitored to confirm that homeowners who participated in these programs remain the owner and primary occupant. What this means is, anyone who has received funds must remain in their homes for a set period of affordability, which may be for up to 20 years. Currently, there are over 5,000 homes the GCU staff is responsible for monitoring on an annual basis in the following programs:

- CDBG
- Impact Fee
- HOME
- NSP 1 & 3
- SHIP

The Property Appraiser’s office has been a valued partner by assisting with the identification of the units that are no longer homesteaded and providing the GCU with the list of noncompliant properties. GCU staff then notifies those owners who are out of compliance and assists them in applying to homestead their property, or make re-payment arrangements with the County. For homeowners who failed to maintain homestead, they are required to repay the County. The most recent monitoring resulted in recapturing over $136,000 this year alone.

The wonderful thing about recapturing these funds is that not only is the program in compliance, but the funds are then made available to assist other eligible families with their dream of owning a home.

Wendy Klopf, Operations Coordinator

Applying New Regulations

DID YOU KNOW? There is a new uniform guidance developed by the White House, Office of Management and Budget (OMB) to improve outcomes and stewardship of taxpayer money?

When and why did this process begin?

The purpose of 2 CFR part 200 is to streamline the Federal government’s guidance on administrative requirements, cost principles, and audit requirements. This ensures federal resources are focused on improving performance and outcomes, while ensuring the financial integrity of taxpayer dollars and other key stakeholders.

Advantages of this reform

The uniform guidance reduces administrative burden and risk of waste fraud and abuse by eliminating duplicative and conflicting guidance. By combining eight previously separate sets of OMB guidance into one, OMB has eliminated about 80 pages (or about 25%) of overlapping duplicative and conflicting provisions of guidance that were developed separately over many years. Furthermore, beyond dealing with the administrative burden associated with understanding such guidance, non-Federal entities have faced risks of more restrictive oversight and audit findings that stem from inappropriate applications of the guidance caused by overlapping requirements. Overall, this new guidance includes changes to the way CHS does business with our subrecipients when awarding funds and managing grants, to reduce the risk and improve reporting integrity.

CHS has worked closely with Collier County’s OMB to implement and comply with this new federal requirement on time and within the expectations, and we are thankful for our partnership with Therese Stanley and Erica Robinson from Collier County’s OMB office.

Nancy Mesa, GCU Senior Accountant
It Takes Two to Tango

A large majority of grants being managed by CHS are done so by sub-awarding to community partners. CHS needs to know partners are low-risk organizations, with the capacity to carry out the program. **So, how do we make this happen?** We perform a Level II Risk Assessment of all prospective awardees to review the merit and risk associated with a potential partner.

Once a review committee reviews and ranks the merit of applications, the CHS Grants Compliance Unit (GCU) assesses the risk.

To successfully meet the requirements of 2 CFR 200, the GCU staff revised the monitoring work plan and developed risk assessment tools that considered attributes such as:

- Financial Stability
- Quality of Management Systems
- History of Performance
- Reports and Findings from audits.

The GCU Senior Accountant performs a Level II Risk Assessment, which is a deep analysis of the financial ability of a partner to perform grant projects. Data is collected by reviewing financial statements and documentation, policies and procedures are investigated and interviews are conducted during a substantial pre-site review and on-site visit at the selected organizations. This past summer, 14 awardees met CHS’s pre-award conditions and were approved by the Board of County Commissioners, in the fall.

This risk assessment process applies to the following formula and competitive grant programs CHS administers: **Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant Program (ESG).**

Nancy Mesa, Senior Accountant

Subrecipient Success is Job 1

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“We are what we repeatedly do. Excellence, therefore, is not an act but a habit.”
Aristotle
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We are committed to our subrecipient’s success. One of the elements of success is providing ongoing training and technical assistance. “The training our staff has received from CHS has been instrumental in giving us the knowledge to successfully navigate ever changing compliance regulations”, said Nick Kouloheras, Habitat For Humanity.

In January 2018, the Grants Compliance Unit (GCU) will begin its annual presentation of subrecipient trainings, designed to assist in their compliance with HUD grants.

The four-part series utilizes a “Cradle to Grave” approach to grant management and compliance. The first two sessions deal with elements common to all entitlement grants, such as setting up files, pay requests, required policies and procedures, documentation of national objectives, and other grant do’s and don’ts. Sessions 3 and 4 delve into more complex requirements for projects that require procurement, address the Davis-Bacon Act requirements, Minority/Women/Disadvantaged Business Enterprise (MWDBE), income eligibility certification, and post close out requirements.

Trainings are interactive to include class discussions. Many times, CHS program staff members will assist the subrecipients by contributing the practices/hints they utilize, to make sure things go right the first time. The goal is to ensure that subrecipients understand, and are accustomed to viewing their grants from a life cycle perspective. By instructing subrecipients on what to expect as they begin their new grant projects, a dialogue is started between CHS and the subrecipient on what type, when and in what form information will be collected and tested. “I would have been lost without the subrecipient training, both on-site and at the County” said Cassandra Beaver, Director of Operations for United Cerebral Palsy of S.W. Florida.
Compliance is a process that starts with an informed subrecipient. The GCU wants subrecipients to understand that compliance is a process that starts with an informed subrecipient who understands the goals and requirements of their grant agreement, and ends with the successful achievement and documentation of those goals and requirements, in a timely manner. By continually training in the proper manner of communicating, doing, documenting, reporting and monitoring, CHS is reinforcing the idea of compliance as a habit of excellence!

Many times, a thorough examination of the requirements of an existing subrecipient’s agreement, will result not only in compliance in an existing grant, but also contributes to a better proposal in subsequent application rounds.

2018 Subrecipient Training Schedule:

Wed., Jan. 10, 2018 from 1-4 pm - Know Your Agreement/Grant Administration Overview

Wed., Jan. 24, 2018 from 1-4 pm - File Maintenance/Time Keeping

Wed., Feb. 7, 2018 from 1-4 pm - Davis Bacon/Fair Housing/Section 3/MWDBE, presented by Eagle Rock, LLC.

Wed., Feb. 21, 2018 from 1-4 pm - Project Closeout/File Retention/Post Closeout Requirements/Continued Use

In addition to compliance training, CHS Program Staff and the GCU Staff are available for technical assistance to organizations who wish to have one on one assistance.

An old phrase talks about the “tail wagging the dog”, meaning, that an item of minor importance can dominate a situation. Too many times, this is true in grant administration. Little everyday actions (or inactions) can potentially become a HUGE compliance issue.

In a one to one setting, CHS staff can assist in advising new subrecipients on how to do things such as set up grant files, review policies for compliance, review segregation of duty requirements and assist non-profit staff on determining what is required for correct quarterly reporting.

Non-profit management teams can also benefit from technical assistance by brain-storming on future potential grant projects, identifying potential areas of conflict of interest, and becoming familiar with how grant requirements will translate into staff functions that work together to complete a compliant project.

If you are a new subrecipient, or a seasoned veteran whose organization has seen high turnover or growth, feel free to call the CHS office at 239-252-2273 and tell us what type of technical assistance you are seeking. We stand READY TO HELP!

Margo Castorena, GCU Operations Analyst

Did you know that Collier County has a compliance website? The website, located at colliercontractors.com, offers compliance guidance for Collier County’s Housing and Urban Development (HUD) funded programs.

Throughout the year, Eagle Rock, LLC., provides Community and Human Services (CHS) with direction and technical assistance for various compliance components of HUD projects. The compliance website, developed by Marcus Goodson, President of Eagle Rock, has proven to be a useful tool for CHS and our partners.

The user-friendly website has a colorful navigation bar at the top of each page that moves
Click for Compliance, Cont’d

the user through various HUD cross cutting compliance topics including:

- Section 3 (economic development)
- Fair Housing
- Minority and Women owned Businesses
- Davis Bacon (wages)
- Job site postings (economic development)
- Construction contracts (compliant language)

Activate any topic button to reveal descriptive information and links on each topic. To the right of each topic is related documents and forms.

Many of Collier County’s HUD/Community Development Block Grant projects are construction related. Before each project begins, CHS conducts a pre-construction conference with grant subrecipients and their contractors. The conference helps to give a better understanding of the methods that Collier County uses to ensure that our projects, contractors, and subrecipients are compliant throughout their projects. The compliance website operates as a demonstrative tool for the conference. The website improves efficiency because we do not have to produce a manual; all forms are downloadable from the website. James Sainvilus, Project Manager at the Immokalee Community Development Agency has used the site and believes that the website is a useful tool to educate both himself and his contractors. "I was able to train myself and the contractor of where to get more information about grant required information. I have downloaded all the documents from the job site posting tab, including the table of contents for posting at the job site. I want to make sure the contractor has them at the site."

One of the most misunderstood HUD regulations is Section 3. As a provision of the HUD Act of 1978, Section 3 serves to help foster economic development, neighborhood improvement and individual self-sufficiency.

The website offers a complete listing of all certified contractors; it is "just a click away". Another click on the same page will display a list of currently certified Section 3 businesses in the area.

Collier’s compliance website also offers Section 3 contractors the opportunity to begin the certification process and offers step by step instructions to achieving this valuable and worthwhile certification.

Community and Human Services continually incorporates processes that increase our efficiency with our programs. Use of the compliance website is another step towards our division’s increased efficiency.

Lisa Oien, Grants Coordinator.

Community Benefits from the Environmental Review

Every Federally Funded project requires some level of Environmental Review. Many of our projects require an Environmental and this process can take as little as 4 weeks to as much as 6-9 months. An Environmental Review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The Environmental Review process is required for all federally assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and, that the property site itself will not have an adverse environmental or health effect on end users.

Not every project is subject to a full Environmental Review (i.e., every project’s environmental impact must be examined, but the extent of this examination varies), but every project must follow the National Environmental Policy Act (NEPA), and other related Federal and state environmental laws.

Compliance with the federal environmental review is important for those HUD funded projects because, HUD, along with the National Environmental Protection Agency, and the NEPA Council on Environmental Quality, maintain that “compliance is critical to obtain the national policy objective of encouraging productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere which in turn will stimulate the health and welfare of the US population; to enrich the un-
Community Benefits from the Environmental Review, Cont’d

Understanding of the ecological systems and natural resources important to the Nation... and attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences” (42 U.S. Code 4331, 2017).

While compliance is critical, one may ask what is the benefit of an Environmental Review on the people of our community, housing, the environment and wildlife? HUD and other environmental protection agencies have established that environmental compliance promotes a number of beneficial outcomes such as: preserving important historic, cultural, and natural aspects of our national heritage, and maintaining, wherever possible, an environment which supports diversity and variety of individual choice; achieving a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities; assurance of safe, healthful, productive, and esthetically and culturally pleasing surroundings for all; achieving a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities (42 U.S. Code 4331, 2017).

Corbett Alday, Executive Officer at Guardian CRM says “there are a number of specific benefits to complying with HUD and other required environmental regulations. Perhaps the most compelling benefits are described in NEPA itself whereby Congress, recognizing the profound impact of man’s activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man” (42 U.S. Code 4331, 2017). In short, environmental compliance promotes a prosperous, safe, and viable America, increasing the quality of life and liberty for all of its human, plant, and animal inhabitants now and for the foreseeable future.”

Article contributed by Guardian CRM

Employment and Housing for Everyone

Many of you may ask how does the federal govt enable communities to ensure employment and fair housing for everyone.

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with Federal, State and local laws, be directed to low and very low-income persons.

Section 3 is important because it ensures that HUD-funded job training, and contracts are provided to local low-income residents, particularly those that reside in public housing, and businesses that employ them. Communities benefit from viable Section 3 programs when residents are gainfully employed and then can financially provide for their families. Collier County’s subrecipients awarded $712,927 in federal funds to Section 3 contractors during the period of 10/1/16-9/30/17. 33% of the funds awarded to Collier County through CDBG are benefiting low and very low certified contractors. This helps to create equal economic opportunity for vulnerable populations.

To the greatest extent feasible, HUD assisted projects must provide opportunities for low or very low-income residents in the project area. Collier County’s compliance website helps subrecipients and contractors better understand Section 3.

With respect to Fair Housing, communities benefit when all Americans are free to live where they can financially afford to live, and raise their families. That choice makes any neighborhood a much better place to live and work. The Fair Housing Act is a federal act in the United States, intended to protect the buyer or renter of a dwelling from seller or landlord.
Employment and Housing for Everyone, Cont’d

discrimination. Its primary prohibition makes it unlawful to refuse to sell, rent to, or negotiate with any person because of that person's inclusion in a protected class. There are seven protected classes under the Federal Fair Housing Act: race, color, religion, sex, National Origin, disability and familial status.

The Fair Housing Act is important because it promotes equality, principals and protections necessary for a truly equitable society. When asked, Marcus D. Goodson, of Eagle Rock Consulting responded

"Fair Housing is a basic fundamental right of all Americans and the enforcement of Fair Housing laws should be a priority of every community. And equally as important is the need to employ people in low-income communities via the Section 3 program."

Article contributed by Kristi Sonntag, CHS Grant Manager and Marcus Goodson, President, Eagle Rock, LLC.

Paying Fair Wages

Federally funded construction projects come with an onslaught of laws and regulations. For federal contractors, knowing about the Davis-Bacon & Related Acts is crucial to ensure trades workers whom are working on federal construction projects are being paid fair wages. The Department of Labor issues wage determinations for several types of construction classified as: building, heavy, highway, or residential with corresponding minimum hourly rates & fringe benefits for each. Wages are determined based on prevailing wages for similar projects, in the same geographic area. Workers can be paid any combination of base rates, plus receive fringe benefits, if the total is equal to at least the total on the wage decision.

For example: a laborer, common and general is to be paid at least $11.79/hour plus a fringe benefit rate of $2.03/hr for a total of $13.82/hr. If a laborer receives $11.00/hour, but gets employer paid benefits, such as medical coverage, to average out to $3.00/hour then they are receiving a total benefit of $14/hr which is enough to cover the minimum of the $13.82 requirement.

The wage determinations are important as it allows local contractors to be competitive in their bids with contractors from other counties where prevailing wages could be significantly lower, thus giving more local contractors more opportunity, and keeping more income in our local community.

There are several ways the Grant Coordinators monitor Davis-Bacon projects. Employment interview forms are used to take a sampling of workers from each category and each subcontractor. The employees are asked what their daily duties are (and we note any activities that we have witnessed), their rate of pay, how often they are being paid (weekly pay is a Davis-Bacon requirement), and if they are getting paid properly for any overtime work. Asking about daily duties, as well as tools that were used, helps to determine if the worker is properly categorized.

CHS also processes certified payroll reports. Each subcontractor submits a weekly report providing information on each worker such as job classification, hourly rate, number of hours worked, and payroll deductions. The payrolls are compared to the interview forms to determine if there are any discrepancies in pay. Recently, there was a project where a worker was listed as a laborer for an electrical company. The laborer stated that he ran wiring and hooked up electrical conduit, both jobs that laborers did not do. It turned out that he was an electrician’s apprentice, and was supposed to be paid a percentage of the electrician rate, but, instead, was being grossly underpaid as a laborer. The subcontractor had to make restitution to the worker for over $2,000.

To learn more about Davis-Bacon, visit colliercontractors.com and click on the Davis-Bacon link.

Don Luciano, Grant Coordinator
**Employee Corner**

Welcome, Yasmith Yadi. Yasmith joins us as a temporary administrative assistant in our SHIP program. She will be assisting with processing disaster applications. Yasmith comes from the University of Florida Extension office.

We have the pleasure of adding Jason Rummer to our team. Jason will work with the Housing & Grant Development Team on housing initiatives and grant planning functions. Jason has been with the county for a few years as an Operations Analyst, working on a wide variety of projects for the Public Services Department.

**Props to the Peeps!**

Dawn Whelan, RSVP Project Director received a nice note regarding RSVP’s response to Hurricane Irma, “I think the RSVP did an excellent job during and after Irma and we were pleased to be able to do our bit.” - FM

A note of thanks was received by Debbi Maxon from a resident who was looking for assistance after Hurricane Irma, “I wanted to let the manager of your department know that today was the first time since hurricane Irma that I have felt like I was treated with complete respect and dignity when seeking assistance. From the moment my husband and I walked into room 211, we finally felt relief. We were assisted by a total of three female employees in the reception area and ALL of them were so professional, knowledgeable, helpful, and also they were kind, caring humanitarians. It was like... Finally! Someone cares AND has answers AND is offering real help!”

Dawn Whelan received an e-mail from Chester Spellman, Director of Americorps State and National thanking her for hosting their team who was in Collier to assess the Hurricane Irma damage, “Thank
Recent Team Accomplishments

Congratulations to Maggie Lopez, our Accounting Supervisor, on earning her Master’s of Science in Management-Accounting!

CHS Grant Coordinators Donald Luciano, Dawn Whelan, Lisa Oien, Tomas Calderon and Rosa Munoz recently completed Project Management Training.

CHS recently completed our annual report card to HUD. Efforts were overseen by Cormac Giblin. Thank you to all the grant coordinators, accountants and OMB for helping to pull it all together.

The Housing Plan, featured in our last newsletter, was accepted by the BCC in October.

CHS Social Services Program was monitored by AAA and achieved 100% compliance.

Props to the Peeps!, Cont’d

you for spending time with us and telling us about your program. We were very impressed with your program. Keep up the good work!”

Kim Grant received a letter from Deborah Cox-Roush, Director of Senior Corps, thanking Collier County for their long standing partnership and commitment to National Service.

Elizabeth Hernandez received a thank you note from a family, expressing their gratitude for helping them get into a home through the SHIP program.

CHS in the News

Throughout October, November and December, the Naples Daily News published several articles referencing, and in support of, the housing plan presented to the Board of County Commissioners at the end of October. Specifically, they reinforced the need, and also printed a few editorials discussing specific elements of the plan. To read the full articles: http://www.naplesnews.com/story/opinion/contributors/2017/10/16/commentary-relief-program-qualifying-hurricane-irma-victims/765475001/

On October 12th, FOX news featured a story on Hurricane Irma disaster mitigation funding. To see the full story: https://www.fox4now.com/news/local-news/collier-county-frees-up-money-to-repair-homes-damaged-by-hurricane-irma

On December 13th, NBC-2, featured a story on Collier’s Drug Court Program. The program uses tax dollars from a federal grant to provide treatment to criminals, instead of placing them in jail. Additionally, David Lawrence Center is using the funds to add case managers and provide training to more mental health professionals. To read the full article: http://www.nbc-2.com/story/37061303/tax-paid-rehab-program-expanding-in-naples

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Recent Team Accomplishments, Cont’d

Louise Pelletier and Zena Sellers provided outreach at the Senior Friendship Center and the Collier Resource Center to discuss eligibility and required documentation needed for prescriptions and medical assistance through the Social Services Program. They covered the referral process to AAA and provided an overview of the services provided, including home services, home delivered meals, and the congregate meal site program.

CHS Values in Practice (VIP) Awards

The Values In Practice (VIP) Award program is a peer to peer recognition initiative designed to be a quick and easy way for employees to recognize someone who exemplifies one of the values/guiding principles the County has adopted.

The Values/Guiding Principles an employee can be recognized for include: Honesty & Integrity, Service, Accountability, Quality, Respect, Knowledge, Stewardship, Collaboration and Self-Initiating, Self-Correcting.

Congratulations to Ana Diaz, Maggie Lopez and Don Luciano for being nominated this quarter!

Ana Diaz was nominated by Dawn Whelan for demonstrating Collaboration

Maggie Lopez was nominated by Louise Pelletier for demonstrating Accountability

Don Luciano was nominated by Louise Pelletier for demonstrating Service