

Interlink Transportation Program Policies

In an effort to maintain a high level of service and compliance with grant awarding agencies, Interlink has enacted the following policies and definitions.

Included within these transportation program guidelines is Attachment I: Vulnerability criteria, Senior Citizens Services Act - SCSA eligibility requirements, Title III of the Older Americans Act - OAA eligibility requirements, and the contribution policy.

Relevant Statutory Authority

- [Title 480-30 WAC](#) – Utilities and Transportation Commission
- [Title 480-31 WAC](#) - Utilities and Transportation Commission
- [Title 81 RCW](#) – Transportation
- [WAC 388-106-1110](#) - Senior Citizens Services Act – SCSA
- [Title III of the Older Americans Act](#) – OAA
- [Americans with Disabilities Act](#)

For more information regarding the ADA and transportation go to the Department of Justice website: <https://www.ada.gov>

The Administration on Aging (AoA) Senior Transportation Resources, “Seniors Benefit from Transportation Partnerships: Promising Practices from the Aging Network,” is a helpful resource. This is a toolbox of technical assistance materials developed to increase the provision and coordination of transportation services for older Americans. The toolbox contains useful practices in transportation coordination, a handbook for creating door-to-door transportation programs, a template for communities to build their own transportation resource guide, a comprehensive resource list for transportation coordination and a presentation on useful practices that can be tailored for different audiences.

Transportation Guidance

1. PROGRAM DEFINITIONS

- a. **Transportation Services** - Interlink’s Transportation Services are designed to transport older persons and those with disabilities to and from medical and health care services, social services, meal programs, senior centers, shopping and recreational activities so such service will be accessible to eligible individuals who lack traditional support, do not have adequate means of transportation, or are unable to use existing transportation.
- b. **Available Funding** - Title III of the Older Americans Act and/or the Senior Citizens Services Act - SCSA may fund this program. For either funding source, the only eligibility requirement is age 60 or over. Refer to the contribution policy in Attachment I for both funding sources.
- c. **Volunteer Transportation** – The transportation of passengers using privately owned vehicles. Drivers are volunteers, generally reimbursed for expenses incurred. Drivers

are reimbursed at the IRS Commercial Mileage Reimbursement Rate. These services may be used along with or as an alternative to regular specialized transportation.

- d. Target Population - The target population for Interlink's Transportation Services is persons age 60 and older and those with disabilities of any age who:
 - i. Need transportation to medical and health care services, social services, meal programs, senior centers, shopping and recreational activities; and
 - ii. Cannot manage their own transportation because:
 - A. They do not have a car; or
 - B. They cannot drive; or
 - C. They cannot afford to drive; and
 - D. They cannot use public transportation; or
 - E. Public transportation is not available, inaccessible, timely, or does not come within walking distance of their destination.

All persons served should be members of the target population. To the degree feasible, persons served should meet the vulnerability criteria listed in Attachment I.

2. INSURANCE FOR PROFIT, NON-PROFIT AND VOLUNTEERS

- a. Coverage –Private not-for-profit transportation providers must meet the requirements described in WUTC [WAC 480-31](#). A company authorized to write such insurance in the state of Washington must have written the insurance or surety bond. The combined bodily injury and property damage liability insurance or surety bond must not be less than the following:
- b. Private Non-Profit Transportation Providers
 - . Passenger seating capacity of 15 or less (including driver) - \$500,000 combined single limit coverage.
 - 1. To be held by Interlink and provided to grantors at least annually or on demand.
 - i. Volunteers
Individual volunteer drivers are required to carry the state mandatory minimum amounts of insurance for private vehicles.
 - 1. To be photocopied by Interlink staff at the time of driver application prior to beginning volunteer service and annually during driver annual review.

For more information see the Washington State Insurance Commissioners fact sheet on [Mandatory Auto Insurance](#).

3. DRIVERS – PAID AND VOLUNTEER

- a. Transportation providers should assure that vehicle drivers are reliable and able to drive safely. In addition to the general personnel selection procedures of the organization, selection of vehicle drivers should include verification that the applicant:
 - i. Has an appropriate and valid Washington State driver's license.
 1. To be photocopied by Interlink staff at the time of driver application prior to beginning volunteer service and annually during driver annual review.
 - ii. Has had no moving traffic violations and has not been involved in any at-fault accidents within the past two years.
 1. To be verified via signed personal attestation by Interlink staff at the time of driver application prior to beginning volunteer service and annually during driver annual review.
 - iii. Is physically capable of safely driving the program vehicles.
 1. To be collected via signed "Driving Safety Assessment" by Interlink staff at the time of driver application prior to beginning volunteer service and annually during driver annual review. (Ride-Along & Vehicle Inspection)
 - iv. Has no previous record of adult or child abuse through the Washington State Patrol criminal identification section or another approved Federal or National criminal history/background check service.
 1. To be collected by Interlink staff at the time of driver application prior to beginning volunteer service and annually during driver annual review.
 - v. The applicant has had no moving traffic violations and has not been involved in any at-fault accidents within the past two years.
 1. To be collected via signed personal attestation by Interlink staff at the time of driver application prior to beginning volunteer service and annually during driver annual review.
 - vi. The volunteer(s) are willing to maintain records and accept record and deposit client donations in an atmosphere that protects the client's right to confidentiality.
 1. To be collected via signed personal attestation by Interlink staff at the time of driver application prior to beginning volunteer service and annually during driver annual review.

Please refer to Volunteers Drivers – A Guide to Best Practices for insurance, risk, driver conduct, background checks, training and other issues related to volunteer transportation issues: <https://www.ctanw.org/volunteer-drivers-manual>

1. TRAINING GUIDELINES

- a. Drivers - Transportation providers should assure that vehicle drivers are trained adequately and are able to safely use all associated equipment through a formal training plan. Providers should maintain records for all drivers to verify that training has been received. The training plan should include at least the following components:
 - i. New drivers should be fully briefed about the transportation program, reporting forms, vehicle operation and the geographic area in which they will operate their vehicles.
 1. To be completed with Interlink staff at the time of driver application prior to beginning volunteer service and annually during annual driver training events.
 - ii. Drivers should complete a defensive driving course.
 1. To be completed with Interlink staff at the time of driver application prior to beginning volunteer service and annually during annual driver training events.
 - iii. Within the first six months of employment, drivers should be provided training that will assist them in better serving the targeted population group within the provider's service area. Passenger assistance training such as ADAPT or PAT could be given directly by the provider or through other training resources available within the community with approval of the AAA.
 1. To be completed with Interlink staff at the time of driver application prior to beginning volunteer service and annually during annual driver training events.
 - iv. Drivers should be made aware of changes in the transportation program, reporting forms and vehicle operation through regular dissemination of such information in a formal verifiable manner (i.e. email, bulletin boards, newsletters, safety meetings, etc.)
 1. Volunteer drivers receive Interlink's monthly newsletter *The Link* which outlines changes as they occur via mail and/or email.

2. DRIVER EVALUATION – PAID AND VOLUNTEER

- a. The provider should evaluate each driver's performance on a semi-annual basis, which would include on-board evaluation of actual practice and general knowledge of the job. The results of these semi-annual evaluations should be documented.
 1. To be completed with Interlink staff at the time of driver application prior to beginning volunteer service and annually during annual driver training events. (Ride-Along & Vehicle Inspection)
- b. At least annually, each driver should have all of their job application information updated so that any changes in their status, which affect their ability to perform as a driver, would be noted. At the same time, their performance and job responsibilities should be reviewed.

1. To be completed with Interlink staff at the time of driver application prior to beginning volunteer service and annually during annual driver training events.
- c. The provider should investigate any accident involving a driver's agency-sponsored activities immediately. A report of the accident should be placed in the driver's personnel file.

3. MAINTENANCE RECOMMENDATIONS

- a. Personally owned vehicles - POV must be maintained under state law minimum requirements. Volunteers are responsible for maintaining their own vehicles.
- v. To be completed with Interlink staff at the time of driver application prior to beginning volunteer service and annually during annual driver training events. (Ride-Along & Vehicle Inspection)

Attachment I

Vulnerability Criteria

A person is considered vulnerable (and therefore eligible for transportation services) if he/she meets the following criteria:

1. Is unable to perform one or more of the activities of daily living listed below without assistance due to physical, cognitive, emotional, psychological or social impairment:
 - Ambulation;
 - Bathing;
 - Cooking;
 - Dressing or undressing;
 - Eating;
 - Housework;
 - Laundry;
 - Managing medical treatments (prescribed exercises, change of dressings, injections, etc.);
 - Managing medications (what to take, when to take, how to store properly, etc.);
 - Managing money (budgeting, check writing, etc.);
 - Personal hygiene and grooming;
 - Shopping;
 - Using the telephone;
 - Toileting;
 - Transferring (getting in and out of bed/wheelchair);

- Transportation; or
- 2. Has behavioral or mental health problems that could result in premature institutionalization or is unable to provide for his/her own health and safety primarily due to cognitive, behavioral, psychological/emotional conditions which inhibit decision-making and threaten the ability to remain independent. AND
- 3. Lacks a traditional support system: Has no family, friends, neighbors or others who are both willing and able to perform the service(s) needed or the informal support system needs to be temporarily or permanently supplemented

SCSA ELIGIBILITY REQUIREMENTS - Age 65 or older; or 60 or older and either unemployed or working 20 hours per week or less. The application form for SCSA funding is [DSHS 14-155](#).

OAA ELIGIBILITY REQUIREMENTS - Age 60 or over.

Contribution Policy

Persons who receive services funded by Title III of the Older Americans Act must be given a free and voluntary opportunity to contribute to the cost of services provided. The same opportunity must be extended to persons who receive an SCSA-funded service, which is not subject to a means test. The service provider must protect each person's privacy with respect to his/her contribution, establish procedures to safeguard and account for all contributions made by users of the service and use all such contributions to expand the service for which the contribution was received.

The service provider may develop a suggested contribution schedule. If a schedule is developed, the provider must consider the income ranges of older persons in the community and the provider's other sources of income. No otherwise eligible person may be denied service because he/she will not or cannot contribute to the cost of the service.

Interlink Policies

2 CFR 200.302 - Financial Management

(a) Interlink's financial management systems, including records documenting compliance with statutes, regulations, and the terms and conditions of grant awards, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award. See also § 200.450.

(b) The financial management system of Interlink must provide for the following (see also §§ 200.334, 200.335, 200.336, and 200.337):

(1) Identification, in its accounts, of all grant awards received and expended and the awarding agencies under which they were received. Funding identification must include, as applicable, the grant program title, grant award identification number and year, name of the awarding entity, and name of the pass-through entity, if any.

(2) Accurate, current, and complete disclosure of the financial results of each grant award or program in accordance with the reporting requirements set forth in §§ 200.328 and 200.329...

(3) Records that identify adequately the source and application of funds. These records must contain information pertaining to grant awards, authorizations, financial obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.

(4) Effective control over, and accountability for, all funds, property, and other assets. Interlink must adequately safeguard all assets and assure that they are used solely for authorized purposes. See § 200.303.

(5) Comparison of expenditures with budget amounts for each grant award.

(6) Written procedures to implement the requirements of § 200.305.

(7) Written procedures for determining the allowability of costs in accordance with subpart E of this part and the terms and conditions of the Federal award.

2 CFR 200.303 - Internal Controls

Interlink must:

(a) Establish and maintain effective internal control over grant awards that provide reasonable assurance that Interlink is managing the grant award in compliance with all applicable statutes, regulations, and the terms and conditions of the grant award. These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

(b) Comply with the U.S. Constitution, all applicable statutes, regulations, and the terms and conditions of the grant awards.

(c) Evaluate and monitor Interlink's compliance with statutes, regulations and the terms and conditions of grant awards.

(d) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.

(e) Take reasonable measures to safeguard protected personally identifiable information and other information the awarding agency or pass-through entity designates as sensitive or that Interlink considers sensitive consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.

2 CFR 200.305 - Cash Management

(a) [Not Applicable] ...

(b) ... [P]ayments methods must minimize the time elapsing between the transfer of funds from the funding entity and the disbursement by Interlink whether the payment is made by electronic funds transfer, or issuance or redemption of checks, warrants, or payment by other means. See also § 200.302(b)(6). ...

(1) Interlink may be paid in advance, provided it maintains or demonstrates the willingness to maintain both written procedures that minimize the time elapsing between the transfer of funds and disbursement by Interlink, and financial management systems that meet the standards for fund control and accountability as established in this part. Advance payments to Interlink should be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of Interlink in carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by Interlink for direct program or project costs and the proportionate share of any allowable indirect costs. Interlink must make timely payment to contractors in accordance with the contract provisions.

(2) Whenever possible, advance payments must be consolidated to cover anticipated cash needs for all grant awards made by the awarding agency to Interlink.

(i) Advance payment mechanisms include... check and electronic funds transfer and must comply with applicable guidance in 31 CFR part 208.

(ii) Interlink may be authorized to submit requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as they like when electronic transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r).

(3) Reimbursement is the preferred method when the requirements in this paragraph (b) cannot be met, when the awarding agency sets a specific condition per § 200.208, or when Interlink requests payment by reimbursement. This method may be used on any grant. When the reimbursement method is used, the awarding agency or pass-through entity must make payment within 30 calendar days after receipt of the billing, unless the awarding agency or pass-through entity reasonably believes the request to be improper.

(4) [Not Applicable] ...

(5) To the extent available, Interlink will disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments from awarding agencies.

(6) [Not Applicable] ...

(7) Standards governing the use of banks and other institutions as depositories of advance payments under grant awards are as follows.

(i) The awarding agency and pass-through entity must not require separate depository accounts for funds provided to Interlink or establish any eligibility requirements for depositories for funds provided to Interlink. However, Interlink must be able to account for funds received, obligated, and expended.

(ii) Advance payments of grant funds must be deposited and maintained in insured accounts whenever possible.

(8) Interlink must maintain advance payments of grant awards in interest-bearing accounts, unless the following apply:

(i) Interlink receives less than \$250,000 in awards per year from the awarding agency.

(ii) The best reasonably available interest-bearing account would not be expected to earn interest in excess of \$500 per year on cash balances.

(iii) The depository would require an average or minimum balance so high that it would not be feasible within the expected cash resources.

(iv) A foreign government or banking system prohibits or precludes interest-bearing accounts.

(9) Interest earned amounts up to \$500 per year may be retained by Interlink for administrative expense. Any additional interest earned on grant advance payments deposited in interest-bearing accounts must be remitted annually to the grant awarding agency...

(i) For returning interest on grant awards paid through any means, the refund should:

(A) Provide an explanation stating that the refund is for interest;

(B) List the Payee Account Number(s) as applicable;

(C) List the grant award number(s) for which the interest was earned; and

(D) Make returns payable to the appropriate party.

(ii) [Not Applicable] ...

(10) Funds, principal, and excess cash returns must be directed to the original awarding agency payment system. Interlink should review instructions from the original awarding agency payment system. Returns should include the following information:

(i) Payee Account Number or Agency information to indicate whom to credit the funding.

(ii) [Not Applicable] ...

(iii) The reason for the return (e.g., excess cash, funds not spent, interest, part interest part other, etc.)

2 CFR 200.306 - Cost Sharing/Matching

(a) For all grant awards, any shared costs or matching funds and all contributions, including cash and third-party in-kind contributions, must be accepted as part of Interlink's cost sharing or matching when such contributions meet all of the following criteria:

- (1) Are verifiable from Interlink's records;
- (2) Are not included as contributions for any other grant award;
- (3) Are necessary and reasonable for accomplishment of project or program objectives;
- (4) Are allowable under subpart E of this part;
- (5) Are not paid by the grantor under another grant award, except where the grantor authorizing a program specifically provides that grant funds made available for such program can be applied to matching or cost sharing requirements of other grant programs;
- (6) Are provided for in the approved budget when required by the grantor; and
- (7) Conform to other provisions of this part, as applicable.

(b) Unrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the grantor. Unrecovered indirect cost means the difference between the amount charged to the grant award and the amount which could have been charged to the grant award under Interlink's approved negotiated indirect cost rate.

(c) Values for Interlink contributions of services and property must be established in accordance with the cost principles in subpart E of this part. If a grantor authorizes Interlink to donate buildings or land for construction/facilities acquisition projects or long-term use, the value of the donated property for cost sharing or matching must be the lesser of paragraph (d)(1) or (2) of this section.

- (1) The value of the remaining life of the property recorded in Interlink's accounting records at the time of donation.
- (2) The current fair market value. However, when there is sufficient justification, the grantor may approve the use of the current fair market value of the donated property, even if it exceeds the value described in paragraph (d)(1) of this section at the time of donation.

(d) Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services must be consistent with those paid for similar work by Interlink. In those instances in which the required skills are not found in Interlink, rates must be consistent with those paid for similar work in the labor market in which Interlink competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation.

(e) When a third-party organization furnishes the services of an employee, these services must be valued at the employee's regular rate of pay plus an amount of fringe benefits that is reasonable,

necessary, allocable, and otherwise allowable, and indirect costs at either the third-party organization's approved federally-negotiated indirect cost rate or, a rate in accordance with § 200.414(d) provided these services employ the same skill(s) for which the employee is normally paid. Where donated services are treated as indirect costs, indirect cost rates will separate the value of the donated services so that reimbursement for the donated services will not be made.

(f) Donated property from third parties may include such items as equipment, office supplies, laboratory supplies, or workshop and classroom supplies. Value assessed to donated property included in the cost sharing or matching share must not exceed the fair market value of the property at the time of the donation.

(g) The method used for determining cost sharing or matching for third-party-donated equipment, buildings and land for which title passes to Interlink may differ according to the purpose of the grant award, if paragraph (h)(1) or (2) of this section applies.

(1) If the purpose of the grant award is to assist Interlink in the acquisition of equipment, buildings or land, the aggregate value of the donated property may be claimed as cost sharing or matching.

(2) If the purpose of the grant award is to support activities that require the use of equipment, buildings or land, normally only depreciation charges for equipment and buildings may be made. However, the fair market value of equipment or other capital assets and fair rental charges for land may be allowed, provided that the grantor has approved the charges. See also § 200.420.

(h) The value of donated property must be determined in accordance with the usual accounting policies of Interlink, with the following qualifications:

(1) The value of donated land and buildings must not exceed its fair market value at the time of donation to Interlink as established by an independent appraiser (e.g., certified real property appraiser or General Services Administration representative) and certified by a responsible official of Interlink as required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) (Uniform Act) except as provided in the implementing regulations at 49 CFR part 24, "Uniform Relocation Assistance And Real Property Acquisition For Federal And Federally-Assisted Programs".

(2) The value of donated equipment must not exceed the fair market value of equipment of the same age and condition at the time of donation.

(3) The value of donated space must not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.

(4) The value of loaned equipment must not exceed its fair rental value.

(i) For third-party in-kind contributions, the fair market value of goods and services must be documented and to the extent feasible supported by the same methods used internally by Interlink.

2 CFR 200.328 - Financial Reporting

Information required by grantors must be collected with the frequency required by the terms and conditions of each grant award, but no less frequently than annually and in coordination with performance reporting.

2 CFR 200.329 - Monitoring and Reporting Performance

(a) Monitoring by Interlink. Interlink is responsible for oversight of the operations of grant supported activities. Interlink must monitor its activities under grant awards to assure compliance with all applicable requirements and that performance expectations are being achieved. Monitoring by Interlink must cover each program, function or activity. See also § 200.332.

(b) Reporting program performance. Interlink must provide cost information to demonstrate cost effective practices (e.g., through unit cost data). In some instances (e.g., discretionary research awards), this will be limited to the requirement to submit technical performance reports (to be evaluated in accordance with awarding agency policy). Reporting requirements must be clearly articulated such that, where appropriate, performance during the execution of the grant award has a standard against which Interlink's performance can be measured.

(c) Non-construction performance reports... information including performance progress reports, Research Performance Progress Reports.

(1) Interlink must submit performance reports at the interval required by the awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. Intervals must be no less frequent than annually nor more frequent than quarterly except in unusual circumstances, for example where more frequent reporting is necessary for the effective monitoring of the award or could significantly affect program outcomes. Reports submitted annually by Interlink and/or pass-through entity must be submitted no later than 90 calendar days after the reporting period. Reports submitted quarterly or semiannually must be submitted no later than 30 calendar days after the reporting period. The final performance report submitted by Interlink and/or pass-through entity must be submitted no later than 120 calendar days after the period of performance end date. A subrecipient must submit to Interlink, no later than 90 calendar days after the period of performance end date, all final performance reports as required by the terms and conditions of the grant award. See also § 200.344. If a justified request is submitted by Interlink, the awarding agency may extend the due date for any performance report.

(2) As appropriate in accordance with above mentioned performance reporting, these reports will contain, for each grant award, brief information on the following unless other data elements are approved by the agency information collection request:

(i) A comparison of actual accomplishments to the objectives of the grant award established for the period. Where the accomplishments of the grant award can be quantified, a computation of the cost (for example, related to units of accomplishment) may be required if that information will be useful. Where performance trend data and analysis would be informative to the awarding agency, the awarding agency should include this as a performance reporting requirement.

(ii) The reasons why established goals were not met, if appropriate.

(iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

(d) Construction performance reports. For the most part, onsite technical inspections and certified percentage of completion data are relied on heavily by awarding agencies and pass-through entities to monitor progress under grant awards and sub-awards for construction. Interlink should include additional performance reports when considered necessary or beneficial.

(e) Significant developments. Events may occur between the scheduled performance reporting dates that have significant impact upon the supported activity. In such cases, Interlink must inform the awarding agency or pass-through entity as soon as the following types of conditions become known:

(1) Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation.

(2) Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more or different beneficial results than originally planned.

(f) Site visits. The awarding agency may make site visits as warranted by program needs.

(g) Performance report requirement waiver. The awarding agency may waive any performance report required by this part if not needed.

2 CFR 200.334 - Retention Requirements for Records

Financial records, supporting documents, statistical records, and all other Interlink records pertinent to a grant award must be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the awarding agency or pass-through entity in the case of a subrecipient. Awarding agencies and pass-through entities must not impose any other record retention requirements upon Interlink. The only exceptions are the following:

(a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

(b) When Interlink is notified in writing by the awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.

(c) Records for real property and equipment acquired with grant funds must be retained for 3 years after final disposition.

(d) When records are transferred to or maintained by the awarding agency or pass-through entity, the 3-year retention requirement is not applicable to Interlink.

(e) Records for program income transactions after the period of performance. In some cases Interlink must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of Interlink's fiscal year in which the program income is earned.

(f) Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: Indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).

(1) If submitted for negotiation. If the proposal, plan, or other computation is required to be submitted to the awarding agency (or to a pass-through entity) to form the basis for negotiation of the rate, then the 3-year retention period for its supporting records starts from the date of such submission.

(2) If not submitted for negotiation. If the proposal, plan, or other computation is not required to be submitted to the awarding agency (or to a pass-through entity) for negotiation purposes, then the 3-year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.

2 CFR 200.405 - Allocable Costs

(a) A cost is allocable to a particular grant award or other cost objective if the goods or services involved are chargeable or assignable to that grant award or cost objective in accordance with relative benefits received. This standard is met if the cost:

(1) Is incurred specifically for the grant award;

(2) Benefits both the grant award and other work of Interlink and can be distributed in proportions that may be approximated using reasonable methods; and

(3) Is necessary to the overall operation of Interlink and is assignable in part to the grant award in accordance with the principles in this subpart.

(b) All activities which benefit from Interlink's indirect (F&A) cost, including unallowable activities and donated services Interlink or third parties, will receive an appropriate allocation of indirect costs.

(c) Any cost allocable to a particular grant award under the principles provided for in this part may not be charged to other grant awards to overcome fund deficiencies, to avoid restrictions imposed by Federal or State statutes, regulations, or terms and conditions of the grant awards, or for other reasons. However, this prohibition would not preclude Interlink from shifting costs that are allowable under two or more grant awards in accordance with existing Federal and State statutes, regulations, or the terms and conditions of the grant awards.

(d) Direct cost allocation principles: If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based

on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then, notwithstanding [paragraph \(c\)](#) of this section, the costs may be allocated or transferred to benefitted projects on any reasonable documented basis. Where the purchase of equipment or other capital asset is specifically authorized under a grant award, the costs are assignable to the grant award regardless of the use that may be made of the equipment or other capital asset involved when no longer needed for the purpose for which it was originally required. See also [§§ 200.310](#) through [200.316](#) and [200.439](#).

(e) If the contract is subject to CAS, costs must be allocated to the contract pursuant to the Cost Accounting Standards. To the extent that CAS is applicable, the allocation of costs in accordance with CAS takes precedence over the allocation provisions in this part.

[[78 FR 78608](#), Dec. 26, 2013, as amended at [79 FR 75885](#), Dec. 19, 2014; [85 FR 49562](#), Aug. 13, 2020]

2 CFR 200.413 - Direct Costs

(a) General. Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a grant award, or other funded program, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect (F&A) costs. See also § 200.405.

(b) Application to grant awards. Identification with the grant award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect (F&A) costs of grant awards. Typical costs charged directly to a grant award are the compensation of employees who work on that award, their related fringe benefit costs, the costs of materials and other items of expense incurred for the grant award. If directly related to a specific award, certain costs that otherwise would be treated as indirect costs may also be considered direct costs. Examples include extraordinary utility consumption, the cost of materials supplied from stock or services rendered by specialized facilities, program evaluation costs, or other institutional service operations.

(c) The salaries of administrative and clerical staff should normally be treated as indirect (F&A) costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

- (1) Administrative or clerical services are integral to a project or activity;
- (2) Individuals involved can be specifically identified with the project or activity;
- (3) Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
- (4) The costs are not also recovered as indirect costs.

(d) Minor items. Any direct cost of minor amount may be treated as an indirect (F&A) cost for reasons of practicality where such accounting treatment for that item of cost is consistently applied to all cost objectives.

(e) The costs of certain activities are not allowable as charges to grant awards. However, even though these costs are unallowable for purposes of computing charges to grant awards, they nonetheless must be treated as direct costs for purposes of determining indirect (F&A) cost rates and be allocated their equitable share of Interlink's indirect costs if they represent activities which:

- (1) Include the salaries of personnel,
- (2) Occupy space, and
- (3) Benefit from Interlink's indirect (F&A) costs.

(f) The costs of activities performed by Interlink primarily as a service to members, clients, or the general public when significant and necessary to Interlink's mission must be treated as direct costs whether or not allowable, and be allocated an equitable share of indirect (F&A) costs. Some examples of these types of activities include:

- (1) Maintenance of membership rolls, subscriptions, publications, and related functions. See also § 200.454.
- (2) Providing services and information to members, legislative or administrative bodies, or the public. See also §§ 200.454 and 200.450.
- (3) Promotion, lobbying, and other forms of public relations. See also §§ 200.421 and 200.450.
- (4) Conferences except those held to conduct the general administration of Interlink. See also § 200.432.
- (5) Maintenance, protection, and investment of special funds not used in operation of Interlink. See also § 200.442.
- (6) Administration of group benefits on behalf of members or clients, including life and hospital insurance, annuity or retirement plans, and financial aid. See also § 200.431.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014; 85 FR 49562, Aug. 13, 2020]

2 CFR 200.414 - Indirect Costs

(a) ... [I]ndirect (F&A) costs must be classified within two broad categories: "Facilities" and "Administration." "Facilities" is defined as depreciation on buildings, equipment and capital improvement, interest on debt associated with certain buildings, equipment and capital improvements, and operations and maintenance expenses. "Administration" is defined as general administration and general expenses such as the director's office, accounting, personnel and all other types of expenditures not listed specifically under one of the subcategories of "Facilities" (including cross allocations from other pools, where applicable). ...

(b) Diversity of nonprofit organizations. Because of the diverse characteristics and accounting practices of nonprofit organizations, it is not possible to specify the types of cost which may be classified as indirect (F&A) cost in all situations. Identification with a grant award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect (F&A) costs of grant awards. Typical examples of indirect (F&A) cost for Interlink may include depreciation on buildings and equipment, the costs of operating and maintaining facilities, and general administration and general expenses, such as the salaries and expenses of executive officers, personnel administration, and accounting.

(c) [Not Applicable] Federal Agency Acceptance of Negotiated Indirect Cost Rates. (See also § 200.306.)

(d) Pass-through entities are subject to the requirements in § 200.332(a)(4).

(e) Requirements for development and submission of indirect (F&A) cost rate proposals and cost allocation plans are contained in Appendices III-VII and Appendix IX as follows:

(1) [Not Applicable] Appendix III to Part 200 - Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Institutions of Higher Education (IHEs);

(2) Appendix IV to Part 200 - Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Nonprofit Organizations;

(3) [Not Applicable] Appendix V to Part 200 - State/Local Governmentwide Central Service Cost Allocation Plans;

(4) [Not Applicable] Appendix VI to Part 200 - Public Assistance Cost Allocation Plans;

(5) [Not Applicable] Appendix VII to Part 200 - States and Local Government and Indian Tribe Indirect Cost Proposals; and

(6) [Not Applicable] Appendix IX to Part 200 - Hospital Cost Principles.

(f) In addition to the procedures outlined in the appendices in paragraph (e) of this section, Interlink does not have a current negotiated (including provisional) rate and has elected to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. As described in § 200.403, costs must be consistently charged as either indirect or direct costs, but may not be double charged or inconsistently charged as both. This methodology once elected must be used consistently for

all applicable grant awards until such time as Interlink chooses to negotiate for a rate, which Interlink may apply to do at any time. No documentation is required to justify the 10% de minimis indirect cost rate.

(g) [Not Applicable] ...

(h) The federally negotiated indirect rate, distribution base, and rate type for a Interlink... must be available publicly on an OMB-designated Federal website.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75886, Dec. 19, 2014; 85 FR 49563, Aug. 13, 2020]

2 CFR 200.416 - Cost Allocation Plans and Indirect Cost Proposals

(a) ... [If] certain services, such as motor pools, computer centers, purchasing, accounting, etc., are provided to operating sub-agencies on a centralized basis... there needs to be a process whereby these central service costs can be identified and assigned to benefitted activities on a reasonable and consistent basis. The central service cost allocation plan provides that process.

(b) Individual operating sub-agencies... normally charge grant awards for indirect costs through an indirect cost rate. A separate indirect cost rate(s) proposal for each operating sub-agency is usually necessary to claim indirect costs under grant awards. Indirect costs include:

(1) The indirect costs originating in each department or sub-agency of the entity carrying out grant awards and

(2) The costs of central services distributed through the central service cost allocation plan and not otherwise treated as direct costs.

(c) The requirements for development and submission of cost allocation plans (for central service costs and public assistance programs) and indirect cost rate proposals are contained in appendices V, VI and VII to this part.

[78 FR 78608, Dec. 26, 2013, as amended at 86 FR 10440, Feb. 22, 2021]

2 CFR 200.430 - Compensation - Personal Services

(a) General. Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the award, including but not necessarily limited to wages and salaries. Compensation for personal services may also include fringe benefits which are addressed in § 200.431. Costs of compensation are allowable to the extent that they satisfy the specific requirements of this part, and that the total compensation for individual employees:

(1) Is reasonable for the services rendered and conforms to the established written policy of Interlink, and consistently applied to all activities;

(2) Follows an appointment made in accordance with Interlink's rules or written policies and meets the requirements of all applicable statutes, where applicable; and

(3) Is determined and supported as provided in paragraph (i) of this section, when applicable.

(b) Reasonableness. Compensation for employees engaged in work on grant awards will be considered reasonable to the extent that it is consistent with that paid for similar work in other activities of Interlink. In cases where the kinds of employees required for awards are not found in the other activities of Interlink, compensation will be considered reasonable to the extent that it is comparable to that paid for similar work in the labor market in which Interlink competes for the kind of employees involved.

(c) Professional activities outside Interlink. Unless an arrangement is specifically authorized by an awarding agency, Interlink must follow its written policies and practices concerning the permissible extent of professional services that can be provided outside Interlink for non-organizational compensation. Where such Interlink-wide written policies do not exist or do not adequately define the permissible extent of consulting or other non-organizational activities undertaken for extra outside pay, the awarding agency may require that the effort of professional staff working on grant awards be allocated between:

(1) Interlink activities, and

(2) Non-organizational professional activities. If the awarding agency considers the extent of non-organizational professional effort excessive or inconsistent with the conflicts-of-interest terms and conditions of the grant award, appropriate arrangements governing compensation will be negotiated on a case-by-case basis.

(d) Unallowable costs.

(1) Costs which are unallowable under other sections of these principles must not be allowable under this section solely on the basis that they constitute personnel compensation.

(2) The allowable compensation for certain employees is subject to a ceiling in accordance with statute. For the amount of the ceiling for cost-reimbursement contracts, the covered compensation subject to the ceiling, the covered employees, and other relevant provisions, see 10 U.S.C. 2324(e)(1)(P), and 41 U.S.C. 1127 and 4304(a)(16).

(e) Special considerations. Special considerations in determining allowability of compensation will be given to any change in Interlink's compensation policy resulting in a substantial increase in its employees' level of compensation (particularly when the change was concurrent with an increase in the ratio of grant awards to other activities) or any change in the treatment of allowability of specific types of compensation due to changes in policy.

(f) Incentive compensation. Incentive compensation to employees based on cost reduction, or efficient performance, suggestion awards, safety awards, etc., is allowable to the extent that the overall compensation is determined to be reasonable and such costs are paid or accrued pursuant to an agreement entered into in good faith between Interlink and the employees before the services were rendered, or pursuant to an established plan followed by Interlink so consistently as to imply, in effect, an agreement to make such payment.

(g) Nonprofit organizations. For compensation to members of nonprofit organizations, trustees, directors, associates, officers, or the immediate families thereof, determination must be made that such compensation is reasonable for the actual personal services rendered rather than a distribution of earnings in excess of costs. This may include director's and executive committee member's fees,

incentive awards, allowances for off-site pay, incentive pay, location allowances, hardship pay, and cost-of-living differentials.

(h) [Not Applicable] Institutions of Higher Education (IHEs)...

(i) Standards for Documentation of Personnel Expenses

(1) Charges to grant awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

(i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;

(ii) Be incorporated into the official records of Interlink;

(iii) Reasonably reflect the total activity for which the employee is compensated by Interlink, not exceeding 100% of compensated activities;

(iv) Encompass all activities compensated by Interlink on an integrated basis, but may include the use of subsidiary records as defined in Interlink's written policy;

(v) Comply with the established accounting policies and practices of Interlink; and

(vi) [Reserved]

(vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one grant award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.

(viii) Budget estimates do not qualify as support for charges to grant awards, but may be used for interim accounting purposes, provided that:

(A) The system for establishing the estimates produces reasonable approximations of the activity actually performed;

(B) Significant changes in the corresponding work activity (as defined by Interlink's written policies) are identified and entered into the records in a timely manner. Short term (such as one or two months) fluctuation between workload categories need not be considered as long as the distribution of salaries and wages is reasonable over the longer term; and

(C) Interlink's system of internal controls includes processes to review after-the-fact interim charges made to a grant award based on budget estimates. All necessary adjustment must be made such that the final amount charged to the grant award is accurate, allowable, and properly allocated.

(ix) Because practices vary as to the activity constituting a full workload, records may reflect categories of activities expressed as a percentage distribution of total activities.

(x) It is recognized that teaching, research, service, and administration are often inextricably intermingled in certain settings. When recording salaries and wages charged to grant awards, a

precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.

(2) For records which meet the standards required in paragraph (i)(1) of this section, Interlink will not be required to provide additional support or documentation for the work performed, other than that referenced in paragraph (i)(3) of this section.

(3) In accordance with Department of Labor regulations implementing the Fair Labor Standards Act (FLSA) (29 CFR part 516), charges for the salaries and wages of nonexempt employees, in addition to the supporting documentation described in this section, must also be supported by records indicating the total number of hours worked each day.

(4) Salaries and wages of employees used in meeting cost sharing or matching requirements on grant awards must be supported in the same manner as salaries and wages claimed for reimbursement from grant funding.

(5) [Not Applicable] For states, local governments and Indian tribes, substitute processes...

(6) Cognizant agencies for indirect costs are encouraged to approve alternative proposals based on outcomes and milestones for program performance where these are clearly documented. Where approved by the Federal cognizant agency for indirect costs, these plans are acceptable as an alternative to the requirements of paragraph (i)(1) of this section.

(7) For grant awards of similar purpose activity or instances of approved blended funding, Interlink may submit performance plans that incorporate funds from multiple grant awards and account for their combined use based on performance-oriented metrics, if requested such plans are to be approved in advance by all involved grant awarding agencies. In these instances, Interlink must submit a request for waiver of the requirements based on documentation that describes the method of charging costs, relates the charging of costs to the specific activity that is applicable to all fund sources, and is based on quantifiable measures of the activity in relation to time charged.

(8) For Interlink where the records do not meet the standards described in this section, the grantor may require personnel activity reports, including prescribed certifications, or equivalent documentation that support the records as required in this section.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75886, Dec. 19, 2014; 85 FR 49565, Aug. 13, 2020]

2 CFR 200.431 - Compensation - Fringe Benefits

(a) General. Fringe benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe benefits include, but are not limited to, the costs of leave (vacation, family-related, sick or military), employee insurance, pensions, and unemployment benefit plans. Except as provided elsewhere in these principles, the costs of fringe benefits are allowable provided that the benefits are reasonable and are required by law, Interlink-employee agreement, or an established policy of Interlink.

(b) Leave. The cost of fringe benefits in the form of regular compensation paid to employees during periods of authorized absences from the job, such as for annual leave, family-related leave, sick leave,

holidays, court leave, military leave, administrative leave, and other similar benefits, are allowable if all of the following criteria are met:

- (1) They are provided under established written leave policies;
- (2) The costs are equitably allocated to all related activities, including grant awards; and,
- (3) The accounting basis (cash or accrual) selected for costing each type of leave is consistently followed by Interlink or specified grouping of employees.

(i) When Interlink uses the cash basis of accounting, the cost of leave is recognized in the period that the leave is taken and paid for. Payments for unused leave when an employee retires or terminates employment are allowable in the year of payment.

(ii) The accrual basis may be only used for those types of leave for which a liability as defined by GAAP exists when the leave is earned. When Interlink uses the accrual basis of accounting, allowable leave costs are the lesser of the amount accrued or funded.

(c) Fringe benefits. The cost of fringe benefits in the form of employer contributions or expenses for social security; employee life, health, unemployment, and worker's compensation insurance (except as indicated in § 200.447); pension plan costs (see paragraph (i) of this section); and other similar benefits are allowable, provided such benefits are granted under established written policies. Such benefits, must be allocated to grant awards and all other activities in a manner consistent with the pattern of benefits attributable to the individuals or group(s) of employees whose salaries and wages are chargeable to such grant awards and other activities, and charged as direct or indirect costs in accordance with Interlink's accounting practices.

(d) Cost objectives. Fringe benefits may be assigned to cost objectives by identifying specific benefits to specific individual employees or by allocating on the basis of entity-wide salaries and wages of the employees receiving the benefits. When the allocation method is used, separate allocations must be made to selective groupings of employees, unless Interlink demonstrates that costs in relationship to salaries and wages do not differ significantly for different groups of employees.

(e) Insurance. See also § 200.447(d)(1) and (2).

(1) Provisions for a reserve under a self-insurance program for unemployment compensation or workers' compensation are allowable to the extent that the provisions represent reasonable estimates of the liabilities for such compensation, and the types of coverage, extent of coverage, and rates and premiums would have been allowable had insurance been purchased to cover the risks. However, provisions for self-insured liabilities which do not become payable for more than one year after the provision is made must not exceed the present value of the liability.

(2) Costs of insurance on the lives of trustees, officers, or other employees holding positions of similar responsibility are allowable only to the extent that the insurance represents additional compensation. The costs of such insurance when Interlink is named as beneficiary are unallowable.

(3) Actual claims paid to or on behalf of employees or former employees for workers' compensation, unemployment compensation, severance pay, and similar employee benefits (e.g., post-retirement

health benefits), are allowable in the year of payment provided that Interlink follows a consistent costing policy.

(f) Automobiles. That portion of automobile costs furnished by Interlink that relates to personal use by employees (including transportation to and from work) is unallowable as fringe benefit or indirect (F&A) costs regardless of whether the cost is reported as taxable income to the employees.

(g) [Not Applicable] Pension plan costs. Pension plan costs which are incurred in accordance with the established policies of Interlink are allowable, provided that:

(h) [Not Applicable] Post-retirement health. Post-retirement health plans (PRHP) refers to costs of health insurance or health services not included in a pension plan covered by paragraph (g) of this section for retirees and their spouses, dependents, and survivors. PRHP costs may be computed using a pay-as-you-go method or an acceptable actuarial cost method in accordance with established written policies of Interlink.

(i) Severance pay.

(1) Severance pay, also commonly referred to as dismissal wages, is a payment in addition to regular salaries and wages, by non-Federal entities to workers whose employment is being terminated. Costs of severance pay are allowable only to the extent that in each case, it is required by

(i) Law;

(ii) Employer-employee agreement;

(iii) Established policy that constitutes, in effect, an implied agreement on Interlink's part; or

(iv) Circumstances of the particular employment.

(2) Costs of severance payments are divided into two categories as follows:

(i) Actual normal turnover severance payments must be allocated to all activities; or, where Interlink provides for a reserve for normal severances, such method will be acceptable if the charge to current operations is reasonable in light of payments actually made for normal severances over a representative past period, and if amounts charged are allocated to all activities of Interlink.

(ii) Measurement of costs of abnormal or mass severance pay by means of an accrual will not achieve equity to both parties. Thus, accruals for this purpose are not allowable.

(3) Costs incurred in certain severance pay packages which are in an amount in excess of the normal severance pay paid by Interlink to an employee upon termination of employment and are paid to the employee contingent upon a change in management control over, or ownership of, Interlink's assets, are unallowable.

(4) Severance payments to foreign nationals employed by Interlink outside the United States, to the extent that the amount exceeds the customary or prevailing practices for Interlink in the United States, are unallowable, unless they are necessary for the performance of Federal programs and approved by the Federal awarding agency.

(5) Severance payments to foreign nationals employed by Interlink outside the United States due to the termination of the foreign national as a result of the closing of, or curtailment of activities by, Interlink in that country, are unallowable, unless they are necessary for the performance of Federal programs and approved by the Federal awarding agency.

(j) [Not Applicable] For IHEs only.

(k) Fringe benefit programs and other benefit costs. Fringe benefit programs (such as pension costs and FICA) and any other benefits costs specifically incurred on behalf of, and in direct benefit to, Interlink, are allowable costs of Interlink whether or not these costs are recorded in the accounting records subject to the following:

(1) The costs meet the requirements of Basic Considerations in §§ 200.402 through 200.411;

(2) The costs are properly supported by approved cost allocation plans in accordance with applicable Federal cost accounting principles; and

(3) The costs are not otherwise borne directly or indirectly by another entity.

[85 FR 49565, Aug. 13, 2020]

- Procurement Policy

- Subrecipient Policy - [Not Applicable]

Interlink does not have or intend to have any subrecipients.

- RSVP Volunteer Management Requirements -

45 CFR 2553.51 (a)(1) - All RSVP Volunteers must be at least 50 years of age.

45 CFR 2553.12 - Interlink's activities listed in the Volunteer Job Description must be compliant with grantor standards.

45 CFR 2553.12 - Job Description must align with the services Interlink has agreed to perform per its grant award.

45 CFR 2553.62 (b) & (f)(3) - Interlink will maintain a designated supervisor who will provide regular and consistent support for all volunteers. This position will be known as "Volunteer Manager"

45 CFR 2553.62 (b) & (f)(3) - Interlink's Volunteer Manager will be trained by grantors and Interlink to manage volunteers. Training includes on the job and training through grantor materials like *Litmos*.

45 CFR 2553.12 - Interlink will recognize the grantor visually and in print. This includes logos on vests and websites as well as language on forms.

- Station Oversight - [Not Applicable]

Interlink does not have or intend to have stations

- Verification of Terms and Conditions -

45 CFR 1225 - Grievances and Adjudication

1. Time Frame
2. Person who receives and responds to complaints both formal and informal
3. Documentation Required
4. Legal Representation must be allowed
5. Freedom from retaliation/reprisal
6. The process/procedure from initial filing to close-out

- Non-Discrimination Policy -

This must be present on all Interlink documents that are to be distributed to the public, including clients, volunteers, and agencies.

“In accordance with Federal civil rights law and civil rights regulations and policies, Interlink, its agencies, offices, and employees, and institutions participating in or administering Interlink programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs or affiliations, military service, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by Interlink.”

- Reasonable Accommodations -

When an individual with a disability requests accommodation and can be reasonably accommodated without creating an undue hardship or causing a direct threat to workplace safety, he or she will be given the same consideration for employment as any other applicant. Applicants who pose a direct threat to the health, safety and well-being of themselves or others in the workplace when the threat cannot be eliminated by reasonable accommodation will not be hired.

Interlink will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation or if the accommodation creates an undue hardship to Interlink. Contact Interlink’s Executive Director with any questions or requests for accommodation.

Individuals who have a recent history of or are currently using illegal drugs are excluded from coverage under Interlink’s ADA policy.

Interlink’s Executive Director, in conjunction with the Interlink Board of Directors, is responsible for implementing this policy, including the resolution of reasonable accommodation, safety/direct threat and undue hardship issues.

Due to its small size, Interlink does not have any means to assist persons with Limited English Proficiency or vision or hearing impaired individuals. Interlink will work with any other support that the requestor suggests so long as the support does not cause an undue hardship on Interlink.

- Criminal History Checks -

Interlink performs criminal history checks, driving history checks, and FBI Fingerprint checks in accordance with the following standards. All checks must be completed prior to a volunteer or staff member assignment and then at least every two years following assignment.

- 1) Interlink pays for criminal history checks for all staff and volunteers via *Sterling Volunteers*.
- 2) Interlink is required to perform a NSOPW, NSCHC, and Fingerprint check for staff who's wages are included in a grant proposal, either directly or as a matching component. These checks will be performed through the National Sex Offender Public website (www.NSOPW.gov), *FieldPrint* (for FBI Fingerprint checks), and *Sterling Volunteers*.