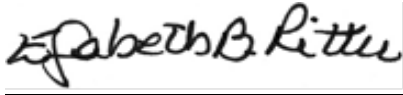


STATE OF CONNECTICUT

STATE DEPARTMENT ON AGING STATE UNIT ON AGING (SUA) PROGRAM INSTRUCTION



Elizabeth B. Ritter, Commissioner

November 26, 2016

Effective Date

PROGRAM INSTRUCTION: SUA-SPI-16-03

1. **SUBJECT:** Instruction for the Completion and Submission of Area Agency on Aging Four-Year Area Plan for the Period of October 1, 2017 through September 30, 2021

The primary purpose of this State Program Instruction is to provide the Area Agencies on Aging (AAAs) with guidelines which must be used in the development and submission of Area plans and amendments including assurances, provisions and information requirements. The Older Americans Act (OAA) requires that Area Agencies on Aging develop and submit an Area Plan to the State Unit on Aging every two, three or four years. Connecticut's State Unit on Aging (SUA) permits the submission of a Plan every four years. Area Plans must describe how the AAAs will provide for a comprehensive and coordinated system of services for older adults and how the AAAs will comply with the other requirements of the OAA. This Program Instruction incorporates highlights of the changes of the Older Americans Act Reauthorization Act of 2016 which became law on April 19, 2016, as well as elements of Program Instruction AoA-PI-14-01.

Section 306 of the Older Americans Act outlines the Area Plan Program Guidance and offers additional instruction.

2016 Older Americans Act (OAA) Reauthorization Act (P.L.114-144): Highlights of changes

National Family Caregiver Support Program (NFCSP)

- Clarifies current law that older adults caring for adult children with disabilities and older adults raising children under 18 are eligible to participate in the National Family Caregiver Support Program. These new definitions allow the NFCSP to be more inclusive in serving older-relative caregivers, including people who are age 55 or older and parents of individuals with disabilities. Section 372(a)
- Clarifies that a state may use not more than 10 percent of the total (federal and non-federal share) dollars available to the state to provide support services to older-relative caregivers. Section 373 (g)(2)(C)

Nutrition Services

- Clarifies that, as appropriate, supplemental foods may be part of a home-delivered meal at the option of a nutrition services provider. Section 336(1)
- Where feasible, encourages the use of locally grown foods in meals programs. Section 339(2)(L)

Senior Centers

- Encourages efforts to modernize multipurpose senior centers and promote intergenerational shared-site models in area agency on aging plans. Section 306(a)(1); Section 321(b)&(c)

Elder Abuse

- Requires Area Plans to include efforts to increase public awareness of elder abuse, neglect, and exploitation. Section 306(a)(6)(H)

PLAN REQUIREMENTS:

Plan Period and Due Date

The Plan shall cover the four-year period of October 1, 2017 through September 30, 2021. The proposed Plan must be received by the State Unit on Aging no later than July 1, 2017.

State Unit on Aging Requirement

Title III-B funds shall be allocated as follows:

A minimum of 25% of funds shall be allocated for in-home services.

A minimum of 21% of funds shall be allocated for access services, including:

- A minimum of 5% of funds shall be allocated for behavioral health services
- A minimum of 10% of funds shall be allocated for transportation services

A minimum of 6% of funds shall be allocated for legal services.

A minimum of 5% of funds shall be allocated for senior centers.

A maximum of 10% of funds may be allocated for MIS (program evaluation) purposes.

Title III-D funds shall be allocated as follows:

- As of October 1, 2016, 100% of Title IIID funds shall be allocated for “highest level” criteria evidence-based prevention and health promotion programs in accordance with the definition found on the Administration for Community Living website (see link below).
http://www.aoa.acl.gov/AoA_Programs/HPW/Title_IIID/index.aspx#current
- At least two different evidence-based programs shall be funded.
- Any one program shall not be funded with more than 60% of the Title III D funds.

Area Plan Content

The Area Agency on Aging shall submit its goals and objectives based on the needs in its Planning and Service Area. The State Unit on Aging is not providing specific plan goals or objectives to the Area Agency on Aging. Area Agencies on Aging are required to include a minimum of one strategy for each state- and federally- funded program, for which the AAA receives funding from the State Unit on Aging. Specific objectives and strategies are guided by the results of needs assessments completed in each Area Agency on Aging region.

At a minimum, plans must address the Focus Areas as listed in the ACL Program Instruction AoA-PI-14-01, as outlined below.

1. Older Americans Act (OAA) Core Programs

2. ACL Discretionary Grants
3. Participant-Directed/Person-Centered Planning
4. Elder Justice

At a minimum, plans must address the Goals as described in the ACL Strategic Plan, 2013-2018, as outlined below.

Goal 1: Advocacy

Goal 2: Protect Rights and Prevent Abuse

Goal 3: Individual Self-Determination & Control

Goal 4: Long-Term Services and Supports

Goal 5: Effective and Responsive Management

Cost Sharing Provisions

Program Instruction SUA-SPI-16-02 provides procedures for soliciting service contributions from recipients of Title III-E services only that are provided under the Older Americans Act. Pursuant to Section 315(a)(2) of the Older Americans Act, cost sharing shall be implemented for all services funded by the Act with the exception of information and assistance, outreach, benefits counseling, case management services, ombudsman, elder abuse prevention, legal assistance, consumer protection services, congregate and home delivered meals, and those services delivered through tribal organizations. Cost sharing shall be implemented for Title III-E, solely for respite and supplemental services under Title III-E.

Additionally, Area Agencies on Aging shall have Title III-E Cost Sharing policies on file with the State Unit on Aging. **Cost sharing policies shall be submitted for approval by Area Agencies on Aging as part of the Area Plan.** Further opportunities for cost sharing through Older Americans Act programs are possible and may occur during the FFY 2018 – FFY 2021 Area Plan period. Any Area Agency on Aging interested in developing a cost sharing policy through an additional Title III program should include this additional program in its cost sharing policies with its Area Plan submission. This addition to the cost sharing policies must be approved prior to its implementation.

An Area Agency on Aging may request a waiver to the State's cost sharing policies, per SUA-SPI-16-02.

Emergency Preparedness Plan

Area Agencies on Aging are required to submit an Emergency Preparedness Plan with the Area Plan. Area Plans will not be considered complete without the inclusion of an Emergency Preparedness Plan that addresses the topic areas outlined in the Exhibit I-9 guidelines.

Request for Direct Service Waivers

AAAs shall award Title III funds by grant or contract to community services provider agencies and organizations. A waiver for the AAA to provide Title III services directly may be granted as an exception to this, per 45CFR 1321.63. As the designated State Unit on Aging under the Older Americans Act, the SDA approves direct service waivers at its discretion, based on a number of factors including the assurances listed below. The SDA shall hold the AAA to a similar standard with its waivers as the AAA holds its community services provider agencies when they seek approval of funding for Title III services.

The AAA provides assurances that:

- Services under the waiver are provided more cost effectively and efficiently by the AAA than by community services provider agencies in the region
- Services under the waiver do not constitute an unnecessary duplication of services already offered in the community
- Services under the waiver may be necessary in the absence of a viable community based provider
- Services under the waiver are deemed necessary under the Area Plan
- Services may be provided under a waiver due to an emergent need on a time-limited basis
- Appropriate data is collected and timely reported for the services under the waiver, as requested by the SDA
- The AAA Board of Directors or Advisory Council, depending on their process, are in concurrence with the request for the waiver and that waiver request represents the maximum allocation for final approval.

Program Instruction SUA-SPI-13-1 provides guidance on the procedure for submitting requests for direct service waivers to the State Unit on Aging. Additional email guidance was provided on March 15, 2016 that updated the deadline for the waivers to April 1st each year to accommodate the AAA allocations process.

LEGAL AND RELATED REFERENCES:

Older Americans Act of 1965, as Amended
 2016 Older Americans Act (OAA) Reauthorization Act (P.L.114-144)
 Code of Federal Regulations; 45 CFR 1321
 U.S. Administration for Community Living Strategic Action Plan 2013-2018
 SUA-SPI-16-02
 SUA-SPI-13-1
 AoA-PI-14-01

Disposition:	Retain for Reference
Distribution:	Area Agencies on Aging
Responsible Unit:	Margaret Gerundo-Murkette Stephanie P. Marino
Previous Issue Dates:	October 2, 2008, November 14, 2012