

Aging Unit Plans

Aging Policy Manual

I. Purpose of Aging Unit Plans

A primary function of the aging unit is to work for the development of a comprehensive and coordinated system for the delivery of social and other needed services. To carry out this role, the aging unit conducts planning focused on how the system of services looks to the individual older person. For that person, an ideal system of services will exist when in response to their needs, at any particular time and over time, an appropriate set of services can be identified, is available, can be obtained and is effective. The systems development strategy incorporates four main elements as follows:

A. Advocacy

The aging unit is charged with representing the views, concerns, and interest of older people. This process strives to preserve the dignity and security of elders, affording as many choice and opportunities as possible. It collects adequate and accurate background facts and statistics about problems and progress, and makes this information available to appropriate people and organizations at local, state, and national levels.

B. Catalyst for Change

The aging unit is a catalyst for the development of comprehensive and coordinated service systems for older persons by encouraging community leaders, service agencies, and aging units to implement needed changes.

C. Direct Support

The aging unit provides direct financial assistance to support the implementation of needed services. The aging unit works with local organizations in direct service development to best meet the needs of older persons in the area. Building upon the service needs and priorities identified in the aging unit plan, emphasis is placed on strengthening the capability and effectiveness of the existing service delivery system to carry out the programs and services.

D. Indirect Support

The aging unit provides support for needed changes to community leaders and local organizations through technical assistance, planning, and orchestration of coalition linkages in the community.

II. The Aging Unit Plan and the Wisconsin Elders Act

The Wisconsin Elders Act places a great deal of emphasis on the aging unit's planning activities.

III. Role of the State Unit on Aging Related to Aging Unit Plans

The Older Americans Act requires that the state agency on aging, which in Wisconsin is the Bureau of Aging and Disability Resources (BADR), develop a uniform format for the AAA plans. To ensure compliance with this uniformity principal, BADR also prescribes the content, format, procedures and timetables for the aging unit plans.

A key component of the aging network is planning. The Older Americans Act requires agencies within the network to engage in thoughtful planning with older people and the communities in which they live. This ensures that services are relevant to the local community and fit with the needs identified during the planning process. A basic principle of the Older Americans Act is to plan with (not for) the older people in the community.

IV. Role of the Area Agencies on Aging Related to Aging Unit Plans

The area agencies on aging (AAAs) play a key role relative to the plans of aging units. In addition to their major role of approving/disapproving the plans of aging units, the area agencies provide planning assistance, monitoring and evaluation of aging unit plans.

V. Planning Requirements and Techniques

The specific content requirements for the aging unit plan will change. Those content requirements will be addressed in the instructions for the aging unit plans.

All aging unit plans shall address the following general requirements:

- Indicate the participation of older people in the development of the plan.

- Show evidence of participation and approval by the policy-making body and advisory committee (where applicable).
- Address all required content areas.
- Indicate a significant focus on meeting the needs of older people.
- Follow the prescribed format.

A. Participation of Older People

At their most basic level, aging unit plans represent what the aging unit proposes to do for and with older people in order to make their lives better. For these plans to have any legitimacy, the aging unit shall involve older people in the development of the plan. Aging units are reminded that they are responsible to plan for all older people, including those in alternative living arrangements.

There are a number of techniques that aging units might use to involve older people in the development of the aging unit plans. When developing the plan, remember that efforts should reach into the community and beyond the current aging participants to ensure representation of needs for the entire elderly population.

Aging units are encouraged to use multiple approaches to involve older people in the planning process:

- (1) Use the area agencies on aging: The area agencies are an invaluable resource to aging units in the development of aging unit plans. Because of their regional focus, AAA's are in a splendid position to offer suggestions and observations based on the plans of many other aging units. Further, AAA's have the ability to bring aging units together to share ideas and provide training. Finally, because of their monitoring and oversight responsibilities the AAA's are intimately familiar with the circumstances of individual aging units. This familiarity can be extremely beneficial in the formulation of plans.
- (2) Attitude survey approach: Information is gathered from a representative sample of older people about issues pertaining to their well-being. Data can be collected by personal interviews, telephone surveys, hand-delivered questionnaires, or mail questionnaires. It is important that the sample of people surveyed be representative of the entire community.
- (3) Key informant approach: The key informant approach identifies community leaders and decision-makers from throughout the county or tribe who are knowledgeable about older people and service systems and can accurately

identify priority needs and concerns. Key informants complete a questionnaire or are interviewed to obtain their impressions of needs.

(4) Community forums: Public meetings are held, during which time participants discuss some of the needs facing older people and what can be done about these priority needs. A wide variety of people are encouraged to attend and express their concerns.

(5) Focus groups: A group of people selected for their particular skills, experience, views, or position are asked a series of questions about a topic or issue in order to gather their opinions. Group interaction is used to obtain detailed information about a particular issue. This approach requires a trained facilitator and a recorder to elicit and capture the dialogue from the group.

The "common identity" recognizes the need to plan *with* (not *for*) older people. Aging unit plans shall show evidence that older people were involved to a significant degree in the development of the aging unit plan.

B. Participation of Policy-Making Body and Advisory Committee

Show evidence of participation and approval by the policy-making body and advisory committee: The aging unit advisory committee (and multiple advisory committees in the case of multi-county aging units) and policy-making body have significant responsibilities for the aging unit plan. In the case of the policy-making body, there is a significant legal and personal liability attached to the plans and actions of the agency. This responsibility requires that the advisory committee (where applicable) and the policy-making body be intimately involved in the development and oversight of the aging unit plan.

Evidence of the involvement and approval of the advisory committee (where applicable) and policy-making body is indicated by the signatures of their respective chairpersons on the aging unit plan document. In the case of multi-county aging units, each county's advisory committee must sign off on the plan.

It is important that the policy-making body and advisory committee (where applicable) take ownership of the aging unit plan. The plan is a reflection of what the policy-making body and advisory committee consider to be the most important things on which the agency should work. Some approaches can increase this sense of involvement.

a. Provide Information but not Decisions

Staff should work with the members of the policy-making body and advisory committee to identify in advance what types of information they need to make decisions related to the plan.

b. Give a Frank Report on the Previous Plan

For the policy-making body and advisory committee to understand what may be done in the future, it is useful for them to engage in a critical discussion of what went right and wrong with the previous aging unit plan. The development of a good plan demands a thorough understanding of what the agency has been doing in the past. That understanding can help set priorities and assign staff and other resources.

c. Give the Policy-Making Body and Advisory Committee Assignments

Policy-making body and advisory committee members are in a perfect position to actively help in the development of aging unit plans. They can act as leaders at local forums, facilitate focus groups, lead discussions with their local aging units and even write portions of the plan.

Members of the advisory committee, in particular, might be divided into planning committees for specific topic areas (e.g., transportation, nutrition). Assisted by aging unit staff, the advisory committees might be charged with outlining issues related to their subject matter and developing policy options for the policy-making body.

C. Meeting the Needs of Older People

Indicate a significant focus on service system development: Aging units represent the key focal points of advocacy, service system development, and service delivery in the Wisconsin aging network. This organizational emphasis is unique to Wisconsin. It is recognition of the key political and service roles played by county and tribal governments in our state.

D. Follow the Prescribed Format and Timetable

The development and submission of the aging unit plan shall follow the procedures, format, and timetable prescribed by BADR.

VI. Public Hearings

Before submitting the area plan to the AAA, the aging unit shall conduct one or more public hearings on the draft plan.

Public hearings shall conform to the following minimum requirements:

A. Time of Hearing

The public hearing shall be scheduled to allow sufficient time for the aging unit to make any modifications or revisions to the plan based on the comments received at the hearing(s).

B. Public Notice

Public notification about the hearings shall begin at least two weeks prior to the hearing. The notification process shall include at least two of the following:

- Newspapers
- Radio announcements
- Television announcements
- Written notices sent to agencies organizations and individuals known to have an interest in the plan

Copies of the notice shall be sent to the AAA. Where appropriate, both written and spoken announcements shall be made in languages other than English. Where possible, multiple notifications should be used. Notifications shall include the date, time, location, and subject of the hearing. In addition, notification shall indicate the location and hours that the plan is available for examination.

C. Location and Number of Hearings

Locations chosen for public hearings shall be convenient and accessible to people with disabilities, and large enough to accommodate all who wish to attend. Provision shall be made when it is known that people with hearing or visual impairments or non-English speaking people will attend.

Where possible, hearings should be held in several locations within the county/tribal area and in conjunction with meetings of local aging organizations. Consider holding hearings at dining centers and senior centers. In the case of multi-county aging units, there must be a minimum of one public hearing in each county served by the aging unit.

D. Opportunity for Comment

Adequate time at the hearing shall be allowed to provide interested parties with an opportunity to comment on the plan. Individuals shall be given an opportunity to submit their comments on the plan in writing.

E. Summary of Comments

Comments received at public hearings shall be recorded in written or taped form. A written summary of the comments received at public hearings shall be attached to the plan when submitted to the AAA. The aging unit shall also indicate changes, if any, which were made to the plan as a result of the comments received at public hearings.

F. Participation of Policy-Making Body and Advisory Committee

Members of the policy-making body and advisory committee shall be notified about all public hearings on the plan. Agencies are encouraged to use members of the policy-making body and advisory committee at the public hearings. A written summary of the comments received at all public hearings shall be given to the members of the policy-making body and advisory committee prior to their review of the final draft of the plan.

VII. Role of Advisory Committee

Where an aging unit has both an advisory committee and a policy-making body, a key role of the advisory committee, as its name implies, is to advise the policy-making body. Specific to the development of the aging unit plan, evidence of the involvement of the advisory committee shall, at a minimum, include all of the following:

- minutes of the advisory committee meetings focused on the development of the plan
- review and comment by the advisory committee on the draft version of the plan prior to its release for public comment and public hearings
- review and approval by the advisory committee of the final aging unit plan, following a review of the comments received from public hearings and community organizations

VIII. Procedures for Approval of Disapproval of an Aging Unit Plan

The Bureau of Aging and Disability Resources will develop procedures and standards related to the approval or disapproval of an aging unit plan. Area agencies on aging shall use these procedures and standards in approving or disapproving aging unit plans.

A. Approval of an Aging Unit Plan

The AAA will grant approval to an aging unit plan that meets content and procedural requirements. Approval signifies the AAA's intent to contract Older Americans Act and state aging funds in the amount indicated and for the purposes set forth in the plan.

B. Conditional Approval of an Aging Unit Plan

An aging unit plan which does not meet all content and procedural requirements may be granted conditional approval. Conditional approval signifies the AAA's intent to contract Older Americans Act and state aging funds in the amount indicated and for the purposes set forth in the plan, if the aging unit remedies content or procedural deficiencies in the plan. An aging unit whose plan has received conditional approval will receive written notification of the conditional approval from the AAA. The notification of conditional approval will delineate the deficiencies of the aging unit plan requiring corrective action. Aging unit plans may receive conditional approval for no more than 90 days, after which the plan will be disapproved. The AAA may limit the administrative funds available to an aging unit operating under a conditionally approved aging unit plan. The AAA will approve an aging unit plan after the aging unit remedies all content and procedural deficiencies.

C. Disapproval of an Aging Unit Plan

An aging unit plan with significant content or procedural deficiencies may be disapproved. Grounds for disapproval include, but are not limited to, any of the following:

- Omission of significant portions of the plan and failure to promptly submit omitted sections.
- Omission of significant procedural elements in the development and submission of the plan.
- Clear indications that requested Older Americans Act and state aging funds will not be used for purposes consistent with the intent of the legislation.
- Significant deviations from or violations of aging unit plan requirements or specifications, and the refusal to take remedial steps.
- Clear evidence of the agency's inability to implement the proposed plan.
- Failure of the aging unit to meet conditions set forth in a notification of conditional approval.

After consultation with BADR, the AAA will notify the aging unit in writing that the plan has been disapproved. The notification will include the reasons for the disapproval and an outline of the procedures to be followed in the aging unit seeks to appeal the disapproval decision.

a. Appeal Process for Plan Disapproval

The AAA will provide an opportunity for an appeal hearing by an aging unit whose plan has been disapproved. The procedures governing the appeal process will follow the standard AAA hearing process.

If the aging unit is dissatisfied with the decision resulting from the AAA hearing, the aging unit may appeal the decision to BADR using the standard BADR hearing process.

IX. Standard Area Agency on Aging Hearing Process

The organization shall file a written request for a hearing with the AAA within 30 days following the applicant's receipt of notice of the initial decision. The AAA shall schedule a hearing within 30 days following the receipt of a request for a hearing and shall issue the hearing decision within 60 days of the date of the hearing. The organization shall receive timely written notice of the reasons for the initial decision by the AAA and information on which the initial decision was based. The organization shall have an opportunity to review any pertinent information on which the initial decision was based. The organization shall have an opportunity to appear in person before an impartial decision-maker in order to refute the basis for the initial decision. The decision-maker must be agreed upon by both parties. The organization shall have the opportunity to be represented by counsel or other representative. As part of the hearing process, the organization shall have the opportunity to present witnesses and evidence and to cross-examine witnesses. The organization will receive a written decision by the impartial decision-maker setting forth the basis for the decision. The AAA and the organization may terminate the formal hearing process at any time if the AAA and the organization negotiate a written agreement which resolves the issue(s) that led to the hearing.

X. Suspension of an Aging Unit Plan

The AAA may suspend all or parts of an approved aging unit plan whenever it considers such action to be essential. The circumstances leading to the suspension of an aging unit plan include, but are not limited to, the following:

- failure to implement the aging unit plan as approved
- non-compliance with aging unit plan assurances or requirements
- evidence pointing to a real or possible failure to comply with federal or state laws, regulations or policies

A. Consequences of a Suspended Plan

The consequence to an aging unit operating with a suspended aging unit plan may include, but is not limited, any of the following:

- During the period of suspension, the AAA will not fund those parts of the aging unit plan activities that have been suspended.
- The aging unit will be required to return federal and state funds where they AAA determines that the suspension will result in substantial unearned balances accruing to those funds on hand with the aging unit.
- The AAA may assume the responsibility for directly operating services.

B. Reinstatement of a Suspended Plan

The AAA may reinstate suspended aging unit plan activities if it determines that the conditions prompting the suspension have been remedied. The aging unit will be notified about reinstatement through the issuance of a notification of a new contract. The new contract will contain all of the following:

- The budget period for which the reinstatement will apply
- A reinstatement of funding not to include costs incurred during the period of suspension
- Unearned contract funds available on the effective date of reinstatement
- Any special conditions governing the plan

C. Appeal Process for a Suspended Plan

The AAA will provide an opportunity for an appeal hearing by an aging unit whose aging unit plan has been suspended. The procedures governing the appeal process will follow the standard AAA hearing process. If the aging unit is dissatisfied with the decision resulting from the AAA hearing, the aging unit may appeal the decision to BADR using the standard BADR hearing process.

XI. Termination of an Aging Unit Plan

The AAA may terminate all or parts of an approved aging unit plan whenever it considers such action to be essential. The circumstances leading to the termination of an aging unit plan include, but are not limited to, the following:

- Continuation of non-remedied suspension for more than 90 days
- Violations of aging unit plan assurances or requirements
- Evidence pointing to a real or possible failure to comply with federal or state law, regulations or policies
- Unavailability of state or federal support

- Severely inadequate and non-remedied program performance

A. Consequences of a Terminated Plan

The consequences to an aging unit operating with a terminated aging unit plan may include, but is not limited to, the following:

- The aging unit will be required to return any unearned federal and state funds to the AAA.
- The AAA will assume the responsibility for the aging unit's aging plan.

B. Reinstatement of a Terminated Plan

The AAA may reinstate a terminated aging unit plan if it determines that the conditions prompting the termination have been remedied. The aging unit will be notified about reinstatement through the issuance of a notification of a new contract.

The new contract will contain all of the following:

- The budget period for which the reinstatement will apply
- A reinstatement of funding, not to include costs incurred during the period of termination
- Unearned contract funds available on the effective date of reinstatement
- Any special conditions governing the plan

C. Final Report on a Terminated Plan

The aging unit shall submit final financial and programmatic reports upon the termination of the aging unit plan covering all projects affected by the termination. All final reports shall be submitted to the AAA within 30 days following the effective date of termination.

All equipment and supplies purchased with federal and state funds shall be disposed of in accordance with procedures outlined by BADR. Any funds realized from the sale of such equipment and supplies will result in the adjustment of project costs.

D. Appeal Process for a Terminated Plan

The AAA will provide an opportunity for an appeal hearing by an aging unit whose plan has been suspended. The procedures governing the appeal process will follow the standard AAA hearing process. If the aging unit is dissatisfied with the decision resulting from the AAA hearing, the aging unit may appeal the decision to BADR using the standard BARD hearing process.

XII. Mid-Year Plan Amendments

Aging units are required to submit amendments to their aging unit plans whenever significant changes of a programmatic or financial nature are necessary so that the plan accurately reflects the status or activities of the aging unit. The prescribed content, procedures, and timetable for amending aging unit plans are determined by BADR.

A. Circumstances Requiring a Mid-Year Plan Amendment

A mid-year aging unit plan amendment is required for circumstances including, but not limited to, the following:

- Receipt of new program funds
- Proposals to incur any cost which requires prior approval that had not been previously approved
- Immediate and significant changes in the programmatic activities of an approved aging unit plan
- Immediate and significant changes in the administrative capacity of the aging unit
- Significant changes to the organizational structure of the aging unit

XIII. Annual Plan Amendments

Aging units are required to submit plan amendments for the second and third years of the three-year aging plan. The prescribed content, procedures, and timetable for amended aging unit plans are determined by BADR.

A. Role of the Advisory Committee and the Policy-Making Body

Where an aging unit has both a policy-making body and an advisory committee, the advisory committee shall review annual amendments to the aging unit plan prior to the review and approval by the policy-making body.

The aging unit's policy-making body shall review and approve annual amendments to the aging unit plan prior to the submission of the plan amendments to AAA. A draft plan may be submitted prior to approval. In the case of multi-county aging units, the advisory committee for each county served by the aging unit must review the annual plan amendments.

B. Approval by the Area Agency on Aging

The AAA will grant approval to an aging unit plan that meets all aging unit-plan content and procedural requirements. Approval signifies the AAA's intent to contract Older Americans Act and state aging funds in the amount indicated and for the purposes set forth in the plan.

C. Annual Plan Status Report

A major element in the annual aging unit plan amendment will be the annual plan status report. The purpose of this report will be to give the advisory committee, policy-making body and the agency staff an opportunity to review progress toward the completion of the major planned activities. The format, content, and procedures for the development of the status report will be determined by BADR.

There are many ways to engage citizen advisors in reviewing the progress on plans:

- Scorecards: When an aging unit develops its aging unit plan it sets annual performance targets (outcomes). At the time for the annual review of the plan the agency and citizen advisors/policy-making body members compare actual to planned performance. Aging unit staff can also be invited to assist in this analysis. This helps the agency keep on track. More importantly, it serves as the opportunity to analyze *why* targets were or were not met, and to adjust future actions accordingly.
- Ask the area agency on aging: One of the major jobs of AAA's is to assess the progress of aging units on their plans. This information should be made available to the members of the policy-making body and advisory committee as they review the progress on the aging unit's plan.

XIV. The Aging Difference

The “aging difference”, also known as the “common identity”, focuses on changing those systems that affect the lives of older people. To accomplish this aim, aging agencies shall engage in well-planned efforts to accomplish the necessary changes needed to help older people.

The evolution of a system of aging and disability resource centers (ADRCs), many of which include formerly free-standing aging units, presents opportunities and challenges for the aging network. The task has moved beyond Older Americans Act activities to planning and coordinating a broader array of home and community-based services for older people. The basic principles of the “common identity” translate well to the mission and vision of the ADRC.

The plans of aging units should not be merely applications for funding. At their very best, the plans of aging units embody the values of the aging difference, with strong emphasis on participatory planning and advocacy. It remains the task of citizen decision-makers, advisors, and aging unit staff to develop plans that incorporate these values.