

Area Agency on Aging Plans Aging Policy Manual

I. Purpose of the Area Agency on Aging Plan

A primary function of the area agencies on aging (AAA's) is to work for the development of comprehensive and coordinated systems for the delivery of social and other needed services. In Wisconsin, the locus of services is typically at the tribal and county level. Unlike many states, regional service organizations and systems are quite rare in Wisconsin. As a consequence, the Wisconsin aging network emphasized a focus on county/tribal-based aging plans about 20 years ago. The role of the area agencies, and their plans, centers on supporting and assisting the efforts of county and tribal aging units in their system development efforts.

II. The Area Agency Plan and the Older Americans Act

The Older Americans Act (OAA) places a great deal of emphasis on the area plan. In large measure, the requirements set for the area plans define the role of the area agencies on aging. Indeed, the OAA sets forth very specific requirements on what must be addressed in area plans.

Section 306 (42 U.S.C. 3026) Area Plans:

"(a) Each area agency on aging designated under section 305(a)(2)(A) shall, in order to be approved by the State agency, prepare and develop an area plan for a planning and service area for a two-, three-, or four-year period determined by the State agency, with such annual adjustments as may be necessary. Each such plan shall be based upon a uniform format for area plans within the State prepared in accordance with section 307(a) (1). Each such plan shall-

- (1) provide, through a comprehensive and coordinated system, for supportive services, nutrition services, and, where appropriate, for the establishment, maintenance, or construction of multipurpose senior centers, within the planning and service area covered by the plan, including determining the extent of need for supportive services, nutrition services, and multipurpose senior centers in such area (taking into consideration, among other things, the number of older individuals with low incomes residing in such area, the number of older individuals who have greatest economic need (with particular attention to low-income minority individuals and older individuals residing in rural areas) residing in such area, the number of older individuals who have greatest social need (with particular attention to low-income minority individuals and older

individuals residing in rural areas) residing in such area, and the number of older individuals who are Indians residing in such area, and the efforts of voluntary organizations in the community), evaluating the effectiveness of the use of resources in meeting such need, and entering into agreements with providers of supportive services, nutrition services, or multipurpose senior centers in such area, for the provision of such services or centers to meet such need;

- (2) provide assurances that an adequate proportion, as required under section 307(a)(2), of the amount allotted for part B to the planning and service area will be expended for the delivery of each of the following categories of services -
 - (A) services associated with access to services (transportation, outreach, information and assistance, and case management services);
 - (B) in-home services, including supportive services for families of older individuals who are victims of Alzheimer's disease and related disorders with neurological and organic brain dysfunction; and
 - (C) legal assistance; and assurances that the area agency on aging will report annually to the State agency in detail the amount of funds expended for each such category during the fiscal year most recently concluded;
- (3) (A) designate, where feasible, a focal point for comprehensive service delivery in each community, giving special consideration to designating multipurpose senior centers (including multipurpose senior centers operated by organizations referred to in paragraph (6) (c) as such focal point; and
 - (B) specify, in grants, contracts, and agreements implementing the plan, the identity of each focal point so designated;
- (4) (A) (i) provide assurances that the area agency on aging will set specific objectives for providing services to older individuals with greatest economic need and older individuals with greatest social need, include specific objectives for providing services to low-income minority individuals and older individuals residing in rural areas, and include proposed methods of carrying out the preference in the area plan;
 - (ii) provide assurances that the area agency on aging will include in each agreement made with a provider of any service under this title, a requirement that such provider will -
 - (I) specify how the provider intends to satisfy the service needs of low-income minority individuals and older individuals residing in rural areas in the area served by the provider;
 - (II) to the maximum extent feasible, provide services to low-income minority individuals and older individuals residing in rural areas in accordance with their need for such services; and
 - (III) meet specific objectives established by the area agency on aging, for providing services to low-income minority individuals and older individuals residing in rural areas within the planning and service area; and
 - (iii) with respect to the fiscal year preceding the fiscal year for which such plan is prepared -

- (I) identify the number of low-income minority older individuals and older individuals residing in rural areas in the planning and service area;
 - (II) describe the methods used to satisfy the service needs of such minority older individuals; and
 - (III) provide information on the extent to which the area agency on aging met the objectives described in clause (i);
 - (B) provide assurances that the area agency on aging will use outreach efforts that will -
 - (i) identify individuals eligible for assistance under this Act, with special emphasis on-
 - (I) older individuals residing in rural areas;
 - (II) older individuals with greatest economic need (with particular attention to low-income minority individuals and older individuals residing in rural areas);
 - (III) older individuals with greatest social need (with particular attention to low-income minority individuals and older individuals residing in rural areas);
 - (IV) older individuals with severe disabilities;
 - (V) older individuals with limited English-speaking ability; and
 - (VI) older individuals with Alzheimer's disease or related disorders with neurological and organic brain dysfunction (and the caretakers of such individuals); and
 - (ii) inform the older individuals referred to in subclauses (I) through (VI) of clause (i), and the caretakers of such individuals, of the availability of such assistance; and
 - (C) contain an assurance that the area agency on aging will ensure that each activity undertaken by the agency, including planning, advocacy, and systems development, will include a focus on the needs of low-income minority older individuals and older individuals residing in rural areas;
- (5) provide assurances that the area agency on aging will coordinate planning, identification, assessment of needs, and provision of services for older individuals with disabilities, with particular attention to individuals with severe disabilities, with agencies that develop or provide services for individuals with disabilities;
 - (6) provide that the area agency on aging will-
 - (A) take into account in connection with matters of general policy arising in the development and administration of the area plan, the views of recipients of services under such plan;
 - (B) serve as the advocate and focal point for older individuals within the community by (in cooperation with agencies, organizations, and individuals participating in activities under the plan) monitoring, evaluating, and commenting upon all policies, programs, hearings, levies, and community actions which will affect older individuals;

- (C) (i) where possible, enter into arrangements with organizations providing day care services for children, assistance to older individuals caring for relatives who are children, and respite for families, so as to provide opportunities for older individuals to aid or assist on a voluntary basis in the delivery of such services to children, adults, and families; and
 - (ii) if possible regarding the provision of services under this title, enter into arrangements and coordinate with organizations that have a proven record of providing services to older individuals, that-
 - (I) were officially designated as community action agencies or community action programs under section 210 of the Economic Opportunity Act of 1964 (42 U.S.C. 2790) for fiscal year 1981, and did not lose the designation as a result of failure to comply with such Act; or
 - (II) came into existence during fiscal year 1982 as direct successors in interest to such community action agencies or community action programs; and that meet the requirements under section 675(c)(3) of the Community Services Block Grant Act (42 U.S.C. 9904(c)(3));
 - (D) establish an advisory council consisting of older individuals (including minority individuals and older individuals residing in rural areas) who are participants or who are eligible to participate in programs assisted under this Act, representatives of older individuals, local elected officials, providers of veterans' health care (if appropriate), and the general public, to advise continuously the area agency on aging on all matters relating to the development of the area plan, the administration of the plan and operations conducted under the plan;
 - (E) establish effective and efficient procedures for coordination of-
 - (i) entities conducting programs that receive assistance under this Act within the planning and service area served by the agency; and
 - (ii) entities conducting other Federal programs for older individuals at the local level, with particular emphasis on entities conducting programs described in section 203(b), within the area;
 - (F) coordinate any mental health services provided with funds expended by the area agency on aging for part B with the mental health services provided by community health centers and by other public agencies and non-profit private organizations; and
 - (G) if there is a significant population of older individuals who are Indians in the planning and service area of the area agency on aging, the area agency on aging shall conduct outreach activities to identify such individuals in such area and shall inform such individuals of the availability of assistance under this Act;
- (7) provide that the area agency on aging will facilitate the coordination of community-based, long term care services designed to enable older individuals to remain in their homes, by means including-

- (A) development of case management services as a component of the long term care services, consistent with the requirements of paragraph (8);
 - (B) involvement of long term care providers in the coordination of such services; and,
 - (C) increasing community awareness of and involvement in addressing the needs of residents of long term care facilities;
- (8) provide that case management services provided under this title through the area agency on aging will-
- (A) not duplicate case management services provided through other Federal and State programs;
 - (B) be coordinated with services described in subparagraph (A); and,
 - (C) be provided by a public agency or a non-profit private agency that-
 - (i) gives each older individual seeking services under this title a list of agencies that provide similar services within the jurisdiction of the area agency on aging;
 - (ii) gives each individual described in clause (i) a statement specifying that the individual has a right to make an independent choice of service providers and documents receipt by such individual of such statement;
 - (iii) has case managers acting as agents for the individuals receiving the services and not as promoters for the agency providing such services; or
 - (iv) is located in a rural area and obtains a waiver of the requirements described in clauses (i) through (iii);
- (9) provide assurances that the area agency on aging, in carrying out the State Long Term Care Ombudsman program under section 307(a)(9), will expend not less than the total amount of funds appropriated under this Act and expended by the agency in fiscal year 2000 in carrying out such a program under this title;
- (10) provide a grievance procedure for older individuals who are dissatisfied with or denied services under this title;
- (11) provide information and assurances concerning services to older individuals who are Native Americans (referred to in this paragraph as 'older Native Americans'), including-
- (A) information concerning whether there is a significant population of older Native Americans in the planning and service area and if so, an assurance that the area agency on aging will pursue activities, including outreach, to increase access of those older Native Americans to programs and benefits provided under this title;
 - (B) an assurance that the area agency on aging will, to the maximum extent practicable, coordinate the services the agency provides under this title with services provided under title VI; and,
 - (C) an assurance that the area agency on aging will make services under the area plan available, to the same extent as such services are available to older individuals within the planning and service area, to older Native Americans; and

- (12) provide that the area agency on aging will establish procedures for coordination of services with entities conducting other Federal or federally assisted programs for older individuals at the local level, with particular emphasis on entities conducting programs described in section 203(b) within the planning and service area.
- (13) provide assurances that the area agency on aging will-
- (A) maintain the integrity and public purpose of services provided, and service providers, under this title in all contractual and commercial relationships;
 - (B) disclose to the Assistant Secretary and the State agency-
 - (i) the identity of each non-governmental entity with which such agency has a contract or commercial relationship relating to providing any service to older individuals; and
 - (ii) the nature of such contract or such relationship;
 - (C) demonstrate that a loss or diminution in the quantity or quality of the services provided, or to be provided, under this title by such agency has not resulted and will not result from such contract or such relationship;
 - (D) demonstrate that the quantity or quality of the services to be provided under this title by such agency will be enhanced as a result of such contract or such relationship; and
 - (E) on the request of the Assistant Secretary or the State, for the purpose of monitoring compliance with this Act (including conducting an audit), disclose all sources and expenditures of funds such agency receives or expends to provide services to older individuals;
- (14) provide assurances that funds received under this title will not be used to pay any part of a cost (including an administrative cost) incurred by the area agency on aging to carry out a contract or commercial relationship that is not carried out to implement this title;
- (15) provide assurances that preference in receiving services under this title will not be given by the area agency on aging to particular older individuals as a result of a contract or commercial relationship that is not carried out to implement this title."

III. Role of the State Unit on Aging Related to Area Agency on Aging 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 area agency's aging plans. The state agency is further charged with ensuring that area aging plans meet all requirements from the Older Americans Act (see above).

Beyond issues of formatting and regulatory compliance, the Older Americans Act gives the state broad responsibilities for planning and advocacy activities for older persons. The Older Americans Act indicates that the state unit on aging shall:

"be primarily responsible for the planning, policy development, administration, coordination, priority setting, and evaluation of all State activities related to the objectives of this Act; and,

serve as an effective and visible advocate for older individuals by reviewing and commenting upon all State plans, budgets, and policies which affect older individuals and providing technical assistance to any agency, organization, association, or individual representing the needs of older individuals;"

With this broad and encompassing mandate BADR, in partnership with the AAA's and the county and tribal aging units, develops planning requirements and processes to address statewide efforts and priorities on behalf of older persons.

IV. Planning Requirements and Techniques

Specific content areas, formats, and timetables will change over time. Those requirements will be addressed in the instructions for the area plans.

All area agency plans shall address all of the following general requirements:

- Indicate the participation of older people in the development of the plan.
- Show evidence of participation and approval by the board and advisory council.
- Address all required content areas.
- Indicate a significant focus on meeting the needs of aging units.
- Follow the prescribed format.

A. Participation of Older People

At their most basic level, area aging plans represent what the AAA proposes to do for and with older people in order to make life better for older people in the planning and service area (PSA). For these plans to have any legitimacy, the area agency shall involve older people in the development of the plan.

There are a number of techniques area agencies might use to involve older people in the development of the area plans, such as the following:

Use the aging units: The membership of the county and tribal aging oversight bodies and advisory groups represent a wealth of experience on the needs of older people. Further, because of their responsibility for the oversight of the aging units, the citizen members of the aging units are in a wonderful position to advise the area agency on what it needs to do to better serve the aging units, and through them older people.

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 to gather their opinions. Group interaction is used to obtain detailed information about a particular issue.

Area agency plans shall show evidence that older people were involved to a significant degree in the development of the area plan.

B. Participation of Board of Directors and Advisory Council

The area agency advisory council and board of directors have significant responsibilities for the area plan. In the case of the board of directors, there is a significant legal and personal liability attached to the plans and actions of the agency. This responsibility requires that the advisory council and board of directors be intimately involved in the development and oversight of the area aging plan.

Evidence of the involvement and approval of the advisory council and board of directors is indicated by the signatures of their respective chairpersons on the area plan document.

It is important that the board of directors and advisory council take ownership of the area plan. The plan is a reflection of what the board and council consider to be the most important things on which the agency should work. Some approaches can increase this sense of involvement.

1. Provide Information but not Decisions

Staff should work with the members of the board and council to identify in advance what type of information is needed to make decisions related to the plan.

There are a number of techniques for involving older people in the planning process. Make this information available to the members of the board and advisory council in a way that allows them to examine the information in the context of the agency's mission.

2. Give a Frank Report on the Previous Plan

For the board and council 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 area 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.

3. Give the Board and Council Assignments

Board and council members are in a perfect position to actively help in the development of area 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 council in particular might be divided into planning committees for specific topic areas (e.g., transportation, nutrition). Assisted by area agency staff, the advisory committees might be charged with outlining issues related to their subject matter and with developing policy options for the board of directors.

C. Meeting the Needs of Aging Units

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.

The importance of aging units to older people must be reflected within the area aging plans. The primary role of the area agencies on aging in Wisconsin is to support the activities and efforts of the county and tribal aging units. While area plans need not be solely a reflection of anticipated activities for and on behalf of aging units, it is vital that area plans reflect a thoughtful and thorough approach to how the agency will work with and on behalf of the aging units within the PSA.

D. Follow the Prescribed Format and Timetable

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

V. Public Hearings

Before submitting the area plan to the Bureau of Aging and Disability Resources, (BADR) the Area Agency on Aging (AAA) 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 AAA to make any modifications or revisions to the plan based on the comments received at the hearing(s).

B. Public Notice

- (1) Public notification about the hearings shall begin at least two weeks prior to the hearing.
- (2) The notification process shall include at least two of the following:
 - newspapers
 - radio announcements
 - television announcements
 - written notice sent to agencies, organizations and individuals known to have an interest in the plan
- (3) Written notices shall be sent to all aging units in the PSA.
- (4) Copy of the notice shall be sent to BADR.
- (5) Where appropriate, both written and spoken announcements shall be made in languages other than English.
- (6) Where possible, multiple notifications should be used.
- (7) 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 vision impairments or non-English speaking people will attend. Where possible, hearings should be held in several locations within the planning and service area and in conjunction with meetings of aging units.

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 BADR. The AAA 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 Board of Directors and Advisory Council

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

The area plan shall demonstrate that the board of directors of the AAA was actively involved in the development of the area plan and that the plan, as submitted, has been approved by the board of directors. Evidence of this required involvement shall include, but not be limited to, all of the following:

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

The advisory council, as its name implies, advises the AAA board and staff. Specific to the development of the area plan, evidence of the involvement of the advisory council shall, at a minimum, include all of the items listed below:

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

VI. Role of the Aging Units

The nature of the relationship between AAA's and aging units is complex. Area agencies are charged with assisting and supporting aging units in the development of local service systems that respond to the needs of older people. Area agencies have the further task of monitoring the plans and activities of aging units to ensure compliance with applicable federal and state laws, policies and procedures. Most importantly however, aging units and area agencies are partners advocating the interests of older people together. For all these reasons it is imperative that aging units be actively involved in the development of the area plans. Minimal evidence of this involvement shall include both of the following:

- minutes of aging units focused on the development of the plan
- review and comments by the aging units on the draft version of the area plan

VII. Procedures for Approval or Disapproval of an Area Plan

Federal regulations authorize the Bureau of Aging and Disability Resources to develop procedures related to the approval or disapproval of an area plan.

A. Approval of an Area Plan

The Bureau of Aging and Disability Resources will grant approval to an area plan which meets all content and procedural requirements. Approval signifies the Bureau of Aging and Disability Resources' intent to grant 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 Area Plan

An area plan which does not meet all content and procedural requirements may be granted conditional approval. Conditional approval signifies the Bureau of Aging and Disability Resources' intent to grant Older Americans Act and state aging funds in the amount indicated and for the purposes set forth in the plan, if the area agency remedies content or procedural deficiencies in the plan.

An area agency whose plan has received conditional approval will receive notification of the conditional approval from BADR. The notification of conditional approval will delineate the deficiencies of the area plan requiring corrective action. Area plans may receive conditional approval for no more than 90 days, after which the plan will be disapproved. BADR may limit the administrative funds available to an area agency operating under a conditionally approved area plan. BADR will approve an area plan after the area agency remedies all content and procedural deficiencies.

C. Disapproval of an Area Plan

An area plan with significant content or procedural deficiencies may be disapproved. Grounds for disapproval include, but are not limited to, 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 area 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 AAA to meet conditions set forth in a notification of conditional approval

The Bureau of Aging and Disability Resources will notify the area agency that the area plan has been disapproved. The written notification will include the reasons for the disapproval and an outline of the procedures to be followed if the area agency seeks to appeal the disapproval decision.

1. Appeal Process for Plan Disapproval

The Bureau of Aging and Disability Resources will provide an opportunity for an appeal hearing by an area agency whose area plan has been disapproved. The procedures governing the appeal process will follow the standard BADR hearing process.

VIII. Suspension of an Area Plan

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

- failure to implement the area plan as approved
- non-compliance with area 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 area agency on aging operating with a suspended area plan may include, but is not limited to, any of the following:

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

B. Reinstatement of a Suspended Plan

BADR may reinstate suspended area plan activities if it determines that the conditions prompting the suspension have been remedied. The AAA will be notified about reinstatement through the issuance of a notification of a new grant award. The new grant award 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 grant funds available on the effective date of reinstatement
- any special conditions governing the plan

C. Appeal Process for a Suspended Plan

The Bureau of Aging and Disability Resources will provide an opportunity for an appeal hearing by an area agency whose area plan has been suspended. The procedures governing the appeal process will follow the standard BADR hearing process.

IX. Termination of an Area Plan

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

- continuation of a non-remedied suspension for more than 90 days
- violations of area plan assurances or requirements
- evidence pointing to a real or possible failure to comply with federal or state laws, regulations, or policies
- unavailability of state or federal support
- severely inadequate and non-remedied program performance

A. Consequences of a Terminated Plan

The consequence to an area agency on aging operating with a terminated area plan may include, but is not limited to, any of the following:

- The AAA will be required to return any unearned federal and state funds to BADR.
- BADR will assume the responsibility for the area agency's aging plan and support for the aging units in the planning and service area.
- BADR may move to remove the agency's designation as an AAA.

B. Reinstatement of a Terminated Plan

BADR may reinstate a terminated area plan if it determines that the conditions prompting the suspension have been remedied. The AAA will be notified about reinstatement through the issuance of a notification of a new grant award. The new grant award 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 grant funds available on the effective date of reinstatement
- any special conditions governing the plan

C. Final Report on a Terminated Plan

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

All equipment and supplies purchased with federal and state funds shall be disposed 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 Bureau of Aging and Disability Resources will provide an opportunity for an appeal hearing by an area agency whose area plan has been terminated. The procedures governing the appeal process will follow the standard BADR hearing process.

X. Mid-Year Plan Amendments

AAA's are required to submit amendments to their area plans whenever significant changes of a financial or programmatic nature are necessary so that the plan accurately reflects the status or activities of the AAA. The prescribed content, procedures and timetable for amended area plans are determined by BADR.

A. Circumstances Requiring a Mid-Year Plan Amendment

A mid-year area 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 area plan
- immediate and significant changes in the administrative capacity of the area agency

XI. Annual Plan Amendments

AAA's 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 area plans are determined by BADR.

A. Role of the Advisory Council and the Board of Directors

The AAA's advisory council shall review annual amendments to the area plan prior to the review and approval by the board of directors.

The AAA's board of directors shall review and approve annual amendments to the area plan prior to the submission of the plan amendments to BADR.

B. Approval by BADR

BADR will grant approval to an area plan which meets all area-plan content and procedural requirements. Approval signifies the Bureau of Aging and Disability Resources' intent to grant 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 area plan amendment will be the annual plan status report. The purpose of this report will be to give the advisory council, board of directors 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 area agency develops its area plan, it sets annual performance targets (outcomes). At the time of the annual review of the plan, the agency and citizen advisors/board 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 aging units: As the key constituent group of the AAA's, the aging units are in a perfect position to advise the AAA's about "mid-course corrections" they feel might be useful in the area plans.

XII. The Aging Difference

The "aging difference" focuses on changing those systems that affect the lives of older people. Given the complicated nature of these systems, aging agencies shall engage in well-planned efforts to accomplish the necessary changes needed to help older people.

Area agencies play a key role in making the aging difference work. The area plans outline how the AAA's plan to work with the aging units in their planning and service areas to make the aging difference a reality.

The evolution of a system of aging and disability resource centers, many of which include formerly free-standing aging units, presents opportunities and challenges for the area agencies on aging. The relationship has moved beyond Older Americans Act activities to planning and coordinating a broader array of home- and community-based services for older people.

It is impossible to overstate the necessity for partnership between the AAA's and their aging units. By working together through interlocking plans and activities, the aging units can most efficiently focus their advocacy and system development activities while buttressed by support and technical assistance from the AAA's.