

Area Plan Year 4 Updates

Full Area Plans – Reminders from Last Year

As a reminder, after DARS approved Final Area Plans for Year 3 (October 1, 2025 through September 30, 2026), the agency expected that Area Agencies on Aging (AAAs) would add information to their websites that indicated that Final Area Plans are accessible in a public location as well as available in print by request. As outlined on page 14 of the [Area Plan Program Companion Manual](#), AAAs have the following two options for adding this content to their websites:

1. AAAs can post the Area Plan Core Documents directly on the website OR
2. AAAs can instruct the public how they can obtain a copy of the Area Plan Core Documents on the website.

This directive becomes important as AAAs prepare for Year 4 of the Area Plan.

General Timeline

Please review the [Area Plan Rollout Timeline for FY 2027 – Year 4](#) more information on the process and deadlines.

General Information

AAAs are not required to complete a full new Area Plan for Year 4. AAAs will only be required to make updates to their previously approved Area Plan (in place for October 1, 2025 through September 30, 2026).

AAAs do not need to submit an updated Part 1 or Part 2 of the Area Plan, which was completed last year.

All AAAs will need to submit an updated Area Plan Budget (reflective of updated allocations and any changes the AAA is making to services that carry through to the budget). With updated allocations from DARS and if further budget changes are needed, AAAs should follow the general instructions from the [Area Plan Budget Companion Manual](#) to complete updated Area Plan Budgets.

As needed, AAAs may need to submit updated Area Plan Program Parts 3 through 6 if there are changes to the services that the AAAs will provide in Year 4. Changes include the discontinuation of a current service, the addition of a new service, and modifications to a current service. In making updates to the Service Pages, AAAs

should follow the general instructions from the [Area Plan Program Companion Manual](#) to complete any required updates that are needed to Area Plan Programs.

AAAs will use the same submission process (i.e., the SharePoint Two-Way Portal) that DARS established for last year's Area Plan to submit their final updates to DARS for review.

Lastly, since each AAA will have an updated budget for Year 4 of their Area Plan, DARS will issue a **Contract Modification** for each AAA. Even if the AAA has not changed any of the Area Plan Program components (e.g., Waivers, Service Pages), the AAA will receive a Contract Modification from DARS.

Required and Additional Forms

For Area Plan Year 4 Updates, each AAA must submit to DARS:

- Area Plan Budget for Year 4
- **NEW:** DARS has created an **Area Plan Cover Sheet**, which will be used to flag what aspects of the AAA's Area Plan are changing for Year 4, if any

Depending on each AAA's needs:

- If the AAA requests to discontinue a current service and/or waiver, the AAA must submit a Service Discontinuation Form and/or a Waiver Discontinuation Form, respectively
- If the AAA requests to add a new service and/or a new waiver, the AAA must complete a new Service Page and/or a new Waiver Request Form, respectively
- If the AAA requests to modify the certain components of a current service or already approved waiver, the AAA must update its existing Service Page or Waiver Request Form, respectively
- If there are changes to the AAA's Home Delivered Meal Program related to Infrequent Delivery, the AAA must: 1) verify the AAA's eligibility with respect to the action, and 2) submit the associated forms and documents accordingly

Blank service page forms are available for the AAAs to use for these purposes.

Directions for Completing the Area Plan Forms

NEW: Area Plan Cover Sheet

This new form will be used in Years 2-4 to flag or highlight the changes to the AAA's Area Plan as it was approved in Year 1 or the prior year. As you complete this form, remember that the intended audience for the Cover Sheet is the general public, the AAA Advisory Council, the AAA Governing Board, and DARS; it is designed to highlight changes to the upcoming year's Area Plan in an easy-to-identify, digestible manner.

- Enter the **AAA Name** and **Date** at the top of the form.
- For **Services to be Provided Section**, refer to the legend to indicate which box must be checked for each program row. **The AAA must check a box for each program row, even if the service is not provided. ALL ROWS SHOULD HAVE A CHECKMARK IN ONE BOX; NO ROWS SHOULD BE LEFT BLANK.**
 - Remember to submit any corresponding Service Pages as required based on your responses (e.g., New Service Page, Service Discontinuation Form, or updates to an existing Service Page).
 - On the top of page 3, if there are any changes to the service(s) the AAA provides (e.g., adding, discontinuing, or changing), summarize those changes in the narrative space provided. Also include any budget impacts your changes may have, which should align with the Area Plan Budget that is also to be submitted.
- The **Waivers Section**, which starts on page 3, mirrors the services section on page 1. The AAA must check a box for each waiver row.
 - Remember to submit any waiver forms accordingly (e.g., New Waiver Request Form, Waiver Discontinuation Form, and any updates to your existing Waiver Requests).
 - If you have changes to your waivers, summarize those in the narrative space provided on page 4.
 - If you do not have changes, indicate "Not Applicable" in the narrative space provided on page 4.
- In the **Public Input Process Section**, refer to the instructions later in this document to determine the type of public input you must solicit, if any (e.g., Public Hearing and 30-Day Public Comment Period). **You must indicate if public input is required or not in this section.**
 - If public input is required, check the 'Required' column and indicate the Date(s) Occurred in the last column. AFTER you have completed your public input, include a narrative summary of comments received in the section below. If no comments were received, indicate that accordingly.
 - If public input is not required, check the 'Not Required' column. You may leave the Date(s) Occurred section blank.
- In the **Advisory Council Section**, indicate if the Advisory Council was consulted or notified. To determine whether Advisory Council Consultation or Notification is required, review the instructions later in this document.
 - When Consultation is Required: Select 'Consultation' from the drop-down and enter the date(s) you consulted the Advisory Council. If Advisory Council Consultation is required, summarize any feedback in the

corresponding narrative section **AFTER** you have completed the consultation activity.

- When Notification is Required: Select 'Notification' from the drop-down and enter the date(s) you notified the Advisory Council about the Area Plan updates.
- For the **Governing Board Approval Section**, indicate if the Governing Board was consulted (approval needed) or notified. To determine whether Governing Board Approval or Notification is required, review the instructions later in this document.
 - When Approval is Required: Select 'Approval' from the drop-down and enter the date(s). If Governing Board Approval is required, summarize any feedback in the corresponding narrative section AFTER you have completed the consultation activity.
 - When Notification is Required: Select 'Notification' from the drop-down and enter the date(s) you notified the Governing Board about the Area Plan updates.

NEW: Service Discontinuation Form

This new form replaces the old process for indicating when a service will be discontinued by the AAA. Previously, AAAs would enter 'This service will be discontinued' on the applicable service page. This new process will help to communicate which services will be discontinued and the process to unwind them. This form is only needed when a service is being discontinued entirely or with permanent intentions.

- Enter the **date**.
- Enter the **service name** that will be discontinued.
- Enter the **effective date** and the current **number of clients** that will be impacted.
- In the **Rationale for Discontinuation Section**, summarize why the AAA is discontinuing the service. Common reasons could include lack of program interest, operating costs exceed funding, other services have been determined to be of greater significance within the PSA, etc.
- In the **Summary of Public Input Received Section**, identify the date(s) for the public input process and public comments received (if no comments were received indicate that accordingly), summarize any feedback received from the Advisory Council Consultation, and identify the date Governing Board approval was received for the discontinuation.

- In the **Unwinding Plan Section**, summarize the following as they apply:
 - o How will clients be transitioned off the service?
 - o How will clients be notified?
 - o What alternative options will be provided to clients?
 - o What staffing impacts/changes might be needed and how will those be handled?
- In the **Summarize Budget Changes (as applicable) Section**, explain how the current funding will be reallocated if there is an impact. Remember this summary should match the Area Plan Cover Sheet.

NEW: Waiver Discontinuation Form

This new form replaces the old process for indicating when a waiver will be discontinued by the AAA. This new process will help to communicate which waiver(s) will be discontinued and the process to unwind them. This form is only needed when a waiver is being discontinued entirely or with permanent intentions.

- Enter the **date**.
- **Select the waiver** that will be discontinued from the dropdown list.
- Enter **effective date** and **number of clients** impacted.
- In the **Rationale for Discontinuation Section**, summarize why the AAA is discontinuing the waiver. **For Direct Service Waivers, list the specific program(s) and corresponding rationale.**
- In the **Summary of Public Input Received Section**, identify the date(s) for the public input process & public comments received (if no comments were received, indicate that accordingly).
 - o Remember that adding or discontinuing a Minimum Adequate Proportion (MAP) Waiver requires a public hearing and a 30-day public comment period. All other waivers require a 30-day public comment period.
 - o Summarize feedback received from the Advisory Council Consultation.
 - o Identify the date Governing Board approval was received.
- In the **Unwinding Plan Section**:
 - o For HDM-ID unwinding, remember that an HDM-ID Transition Plan must be submitted.
 - o For MAP, Cost Sharing and Alternative Fee Scale Waivers, state any client impacts.
 - o For Direct Service Waivers, how will clients be notified of service delivery changes?

- In the **Summarize Budget Changes (as applicable) Section**, explain how the current funding will be reallocated. Remember this summary should match the Area Plan Cover Sheet.

Process

A. Identify the Extent of Needed Changes to the AAA Area Plan for Year 4:

Determine if the requested changes will require full public input, limited public input, or no public input.

B. Complete the Required or Needed Program and Budget Forms:

Use the most current forms available on the [VDA Providers Portal](#).

C. Complete the Required Public Input Process Elements

Based on the Area Plan changes, determine what is needed and complete those processes (e.g., 30-Day Public Comment Period, Public Hearing, Advisory Council consultation or notification, and/or Governing Board approval or notification¹).

D. Submit Required Information to DARS for Approval

DARS will review all Area Plan Forms and Budgets. DARS may request further clarification, if needed.

E. Upon Approval, DARS will issue the official Contract Modification

Once a contract modification has been executed, the AAA agency can now implement its proposed program changes.

Public Input and Governing Board Approvals

Changes to an Area Plan for Year 4 of the Area Plan Cycle may constitute Area Plan Amendments (Type 1 or Type 2) or Area Plan Modifications. The extent of the changes will determine what level of public input is required.

Type 1 Area Plan Amendments

Some Area Plan Amendments are subject to the entire public input process, which includes the 30-Day Public Comment Period, the Public Hearing, Advisory Council Consultation, and Governing Board Approval requirements.²

Type 1 Area Plan Amendments include changes to a Minimum Adequate Proportion (MAP) Waiver. Further, substantial or numerous amendments to an AAA Area Plan for Year 4, taken together, may rise to the level of requiring the entire public input process;

¹ See Governing Board section for more details

² See Governing Board section for more details

in these instances, AAAs should consult with DARS staff in advance of preparing to determine the level of public input that DARS will require.

If Type 1 Area Plan Amendments are needed, the AAA must make the following documents available for review and public inspection as is described in the Area Plan Program Companion Manual on pages 8-12:

- The completed Checklist/Cover Sheet, which identifies/summarizes changes to the Area Plan for Year 4 [NEW]
- Any updated Waiver Request or Service Page Forms, including Discontinuation Forms, for Year 4
- The following Area Plan Budget Excel worksheets for Year 4:
 - Summary
 - Requirements
 - Title III
 - Title III-E
 - III-E Grandparents

Type 2 Area Plan Amendments

Some Area Plan Amendments are subject to the 30-Day Public Comment Period (but not the Public Hearing), Advisory Council Consultation, and Governing Board Approval.³

Type 2 Area Plan Amendments include changes to Waivers for Cost Sharing, Alternative Fee Scale, or Direct Services, and the addition or removal of an AAA service. Further, moderate amendments or various modifications, even if individually minor, may also fall into this category; in these instances, AAAs should consult with DARS staff in advance of preparing to determine the level of public input that DARS will require.

If Type 2 Area Plan Amendments are needed, the AAA must make the following documents available for review and public inspection as is described in the Area Plan Program Companion Manual on pages 8-12:

- The completed Checklist/Cover Sheet, which identifies/summarizes changes to the Area Plan for Year 4 [NEW]
- Any updated Waiver or Service Page Forms, including Discontinuation Forms, for Year 4
- The following Area Plan Budget Excel worksheets for Year 4:
 - Summary
 - Requirements
 - Title III
 - Title III-E
 - III-E Grandparents

Area Plan Modifications

³ See Governing Board section for more details

Lastly, some minor changes to the Area Plan do not rise to the level of Area Plan Amendments and are considered to be **Area Plan Modifications**. These require the AAA to notify the AAA Advisory Council of the changes; however, Advisory Council consultation is optional. The AAA must also notify the Governing Board of the changes.⁴ Area Plan Modifications do not require a 30-Day Public Comment Period or Public Hearing.

Area Plan Modifications include the annual budget adjustments based on the AAA's new FY estimated allocation, transfers between Title III-B and III-C or State General Funds, and adjustments to AAA program/service budgets (e.g., increasing funding in one service and allocating it to another within the same funding source).

Other possible Area Plan Modifications are changes to currently offered services. These include, but may not be limited to, AAA address changes (e.g., AAA offices or congregate meal site locations), changes to contracted service providers, changes to the congregate meal schedule, changes to legal assistance delivery method, and changes to disease prevention/health promotion evidence-based service offerings.

In moving forward with Area Plan Modifications, the AAA must prepare the following documents for notification to the Advisory Council and Governing Board:

- The completed Area Plan Cover Sheet, which identifies/summarizes changes to the Area Plan for Year 4
- Any updated Waiver or Service Page Forms, including Discontinuation Forms, for Year 4
- The following Area Plan Budget Excel worksheets for Year 4:
 - Summary
 - Requirements
 - Title III
 - Title III-E
 - III-E Grandparents

Final Area Plan

After the AAA's Area Plan Year 4 Updates have been approved by DARS, the AAA must update the Area Plan materials and provide ongoing public access to them following the instructions outlined on page 14 of the [Area Plan Program Companion Manual](#).

This includes:

- The Final Area Plan approved for October 1, 2026 through September 30, 2027
- The completed Area Plan Cover Sheet, which identifies/summarizes changes to the Area Plan for Year 4

⁴ See Governing Board section for more details

- Any updated Waiver Request or Service Page Forms, including Discontinuation Forms, for Year 4
- The following Area Plan Budget Excel worksheets for Year 4:
 - Summary
 - Requirements
 - Title III
 - Title III-E
 - III-E Grandparents

DARS can also work with the AAA to consolidate the above documents for public posting. AAAs should reach out to DARS if they are interested in this option.

Governing Board Approval

During Years 2-4 of an Area Plan Cycle, AAAs must seek approval or provide notification to their respective governing boards on the upcoming year's Area Plan (see the Public Input and Governing Board Approvals section for more information on when approval is required or when notice is permitted). In implementing the governing board expectations for Area Plans Years 2-4, AAAs should adhere to the guidelines outlined below.

Private non-profit AAAs, as defined in 22VAC30-60-20, must seek approval from (or when permitted, provide notification to) their organization's legally-designated governing board.

Government-sponsored AAAs, as defined in 22VAC30-60-20, include the following structure types:

1. AAAs created through the joint exercise of powers
2. AAAs created as units of community services boards (CSBs)
3. Units of general purpose by local government

AAAs created through the joint exercise of powers and AAAs created as units of CSBs must adhere to the governing board requirements for private non-profit AAAs (stated above).

AAAs that are units of general purpose by local government may identify a designated approver in lieu of the AAA's respective city or county governing board. The designated approver must be organizationally placed outside of the AAA unit and have oversight over the AAA unit. Generally, a designated approver will serve as a county/city administrator/manager or deputy city/county administrator/manager. If the AAA wishes to use a designated approver in lieu of the AAA's governing board, the AAA must submit the designated approver's information as well as an organizational chart reflecting the placement of the AAA's proposed designated approver to DARS for review and approval.

NOTE: Designated approvers are only permitted to be used by AAAs that are units of general purpose by local government and during Area Plan Updates for Years 2-4 or during mid-year Area Plan changes.