Frequently Asked Questions

Annually Required Documents & Emergency Preparedness Documents

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Annually Required Documents

1. **Question: Is it required to complete the organizational affiliation and non-agency information for the Board Member section?**

   Answer: Yes, please fill in the forms completely. However, DARS does understand that local government officials and other organizational representatives may be apprehensive to provide this information. If the AAA is unable to fully complete this section, please contact DARS staff to let us know prior to submitting.

2. **Question: Can the Board of Directors have a liaison from the Advisory Council as a voting member?**

   Answer: No, as part of the Older Americans Act (OAA) Final Rule, members of the Governing Board are not permitted to also be members (voting or non-voting) on the Advisory Council and visa versa. No member may serve in a dual role on the Governing Board and the Advisory Council even if the member is a non-voting member (see: 45 CFR § 1321.63(d)). However, AAA staff should coordinate information sharing between the bodies, and at times it may be appropriate for a member from one body to present or provide an update to the other body. Further, Governing Board and Advisory Council meetings are considered open to the public and a member from one body should not be barred from attending the other body if the member expresses individual interest in doing so. DARS will be covering requirements and expectations around the operations of Governing Boards and Advisory Council in more detail down the road as it works to achieve compliance with the OAA Final Rule.

3. **Question: How often should AAAs complete the staffing list?**

   Answer: AAAs should complete the staffing list whenever major staffing changes occur or at a minimum annually. DARS does not expect AAAs to submit a new staffing sheet for every staffing change, but AAAs must notify DARS when key leadership changes occur to ensure email lists are appropriately updated.

4. **Question: How does the new AAA Information Form work?**

   Answer: The new AAA Information Form uses a JavaScript to track all changes within the document and turn them red.

   When the document is opened, a pop-up window will open and state "Change tracking is active and new text will turn red." As you complete the form, new changes will turn red. This will help both DARS and your agency locate where the new information in the from is, which then assists the entities in identifying and updating contact information in other processes as needed. When the AAA finishes updating the form, the AAA should submit the version containing red text to DARS. When the AAA needs to make new changes, the AAA should open the previously submitted version of the document, click the button at the top labeled "Reset Text Color" and all the text will turn black. At the point, the AAA can update the form with new information, which will turn red again and indicate to DARS the information that needs to be further updated.

Emergency Preparedness Documents

1. **Question:** Is completion of the Emergency Preparedness Documents a requirement or suggestion?

   Answer: AAAs are already required to have the *Continuity of Operations Plan (COOP)*, and some AAAs already have Risk Assessments and Emergency Response Plans (either specific to the AAA or for the AAA's larger umbrella structure). In order to comply with the OAA Final Rule, AAAs must now have, in addition to the COOP, a *Risk Assessment for All-Hazards* and *All-Hazards Emergency Response Plan* (see 45 § 1321.97(b))*. In the absence of detailed specific template or elements from ACL on this regulatory requirement, DARS has researched and developed a template that reflects standard operating practices for emergency preparedness. Based on your AAA's current COOP, or Risk Assessment or Emergency Plan (if already in place), your AAA may have documented some of the new Risk Assessment or Emergency Plan elements. If so, the AAA may (1) submit current COOP, Risk Assessment and/or Emergency Preparedness documents and notate in the DARS-provided template where to find the element in the current documents or (2) enter the information from the AAA's current documents directly into the DARS-provided template.

2. **Question:** Is it possible for DARS to reconsider the implementation date for the Emergency Preparedness plans and documents? This is a significantly heavier lift than what we have done in the past?

   Answer: DARS recognizes that this Emergency Preparedness work is more robust than what AAAs have completed previously. As part of the OAA Final Rule, emergency planning is more emphasized, and expectations are more detailed. Because of this, DARS recognizes that some of the components will need to be further built out over the next couple of years. Please remember that Emergency Preparedness serves an ever important and evolving role for AAAs. Older adults, especially those who live alone, can be particularly vulnerable during disasters and emergencies, and any proactive efforts your AAA employs to prepare will help the AAA maintain continuity of operations and support the AAA's clients.

3. **Question: For the *At Risk Demographic Population* page, could we refer to the Area Plan's demographic section to complete this page?**

   Answer: Yes, to complete the *At Risk Demographic* page, the AAA could refer to the Area Plan's demographic section. The AAA may also use another methodology to determine its at risk demographic.
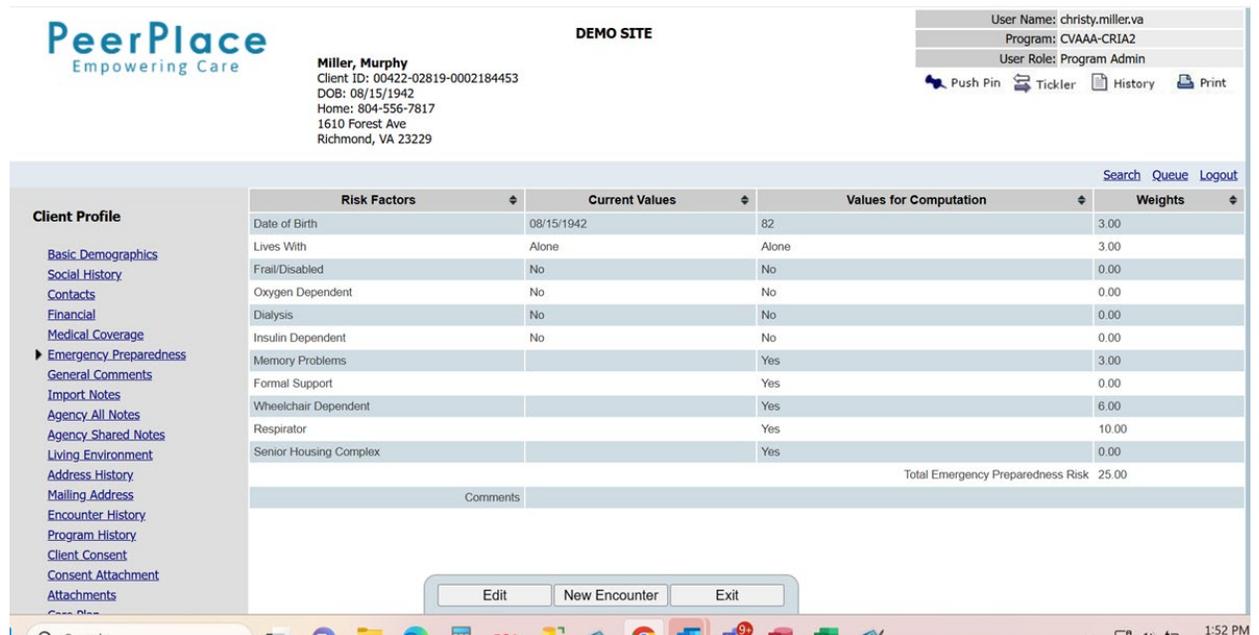
4. **Question: Is the special needs registry a new requirement and how do we populate the registry?**

   Answer: Yes, the Special Needs Registry is a new component. The Special Needs Registry is a registry of clients with specific needs (e.g., medical conditions, language barriers, assistive devices) to tailor response efforts accordingly. AAAs should come up with a methodology for determining which clients should be offered to be added to the Special Needs Registry and a secure process to store and maintain it.

   Localities may already have already developed a Special Needs Registry as part of their local emergency preparedness efforts. It is encouraged that you coordinate with your local emergency management personnel to determine what registries already exist. Find your Local Emergency Managers using this directory: https://lemd.vdem.virginia.gov/Public.

   Alternatively, AAAs may provide information to clients on how to access and self-refer to their local Special Needs Registry.

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As another option, AAAs may use the *Emergency Preparedness* tab in PeerPlace to assess client's risk factors for emergency preparedness and create a procedure for offering to add a client to the Special Needs Registry.

5. **Question:** For the Risk Assessment, is it possible for AAAs to contract out the risk assessment process? If so, is there additional funding to accomplish this?

   Answer: AAAs may contract out the risk assessment process. There are vendors that have expertise in this area and should be able to help the AAA. The AAA may also want to reach out to their local emergency response contacts for guidance and feedback into the development of these documents. Unfortunately, there is no additional funding available for this.

6. **Question:** For Attachment A: *Assessing Vulnerability,* how do we determine whether a hazard has a high, medium or low impact?

   Answer: DARS asks that the AAA make its best effort to determine a hazard's potential level of impact based on experience and expertise. DARS recognizes that this is not perfect science. AAAs may also want to reach out to their local emergency response contacts for guidance and feedback into the development of potential impact ratings.

7. **Question:** Do the Emergency Preparedness documents and plans need to be approved by the AAA Governing Board?

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Answer: No, the Emergency Preparedness documents do not need to be approved by the AAA's Governing Board. DARS specifically pulled these documents out from the Area Plan process to allow for additional time to complete them and to carve them out of that approval process/requirement.

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