



AAA Input Session

March 26, 2025



Agenda



- Funding Updates
- Draft Amended State Plan for Aging Services: Public Input Process
- Intrastate Funding Formula (IFF): Touch Base
- Area Plan Overview: Rollout and Development Timeline
- Annual Documents and Emergency Preparedness Documents: Rollout and Development Timeline
- No Wrong Door Documents
- AAA Document Submission Portal
- Home Delivered Meals - Infrequent Delivery Waivers: Policies & Area Plan Updates



Funding Updates

Funding Updates



- The House and Senate passed a continuing resolution (CR) to extend federal funding through Sept. 30, 2025 (the end of the federal fiscal year), avoiding a federal government shutdown.
- The CR has the following impacts for ACL and the Medicare Improvement for Patients and Providers Act (MIPPA)
 - The CR includes a reduction of \$29,268,000 in funding for the Administration for Community Living (ACL). This reduction is an elimination of earmark funding (more formally known as Community Projects Funding or Congressionally Directed Spending). Earmarks allow members of Congress to request that federal funds be set aside for specific projects in their districts. ACL did not request any funding for this category for FY25.
 - The CR includes an extension of MIPPA through September 30, 2025, and the full-year funding for each of the entities that administer MIPPA.
- The funding amounts for Virginia remain pending the issuance of the final Notice of Award (NOA) documents.
- The final NOAs will be used in calculating the allocations (via the IFF) for FFY2026.



Draft Amended State Plan for Aging Services

Public Input Process

State Plan for Aging Services



- DARS is hoping to avoid a Corrective Action Plan (CAP) for the State Plan for Aging Services
- ACL has finalized the new State Plan Guidance - effective January 13, 2025
- To avoid a CAP, these are the **hard deadlines**:
 - **June 1**: Submit a draft amended State Plan to the ACL Regional Administrator (Stephanie Cole) for review and input
 - **July 1**: Submit a final/signed amended State Plan to ACL Central Office, via our Regional Administrator, for review and potential approval
- OAA-required tasks that must be accomplished before June:
 - 30-day public comment period
 - [Virtual] public hearing

Amendments Required

No Updates

- Body of the Plan
- **Attachment C:
Intrastate Funding
Formula**

Logistic Updates

- Cover Page
- Table of Contents
- [Remove Appendix 6]

Minor Updates

- Letter from the Secretary
- Letter from the Commissioner
- Verification of Intent
- Attachment A: Assurances
- New Attachment D: Geographic Service Boundaries (replaces Appendix 6)

Substantive Updates

- **Attachment B:
Information
Requirements**
- New Attachment E: Evidence of Public Comment

Amended State Plan Timeline



VIRGINIA DEPARTMENT FOR AGING
AND REHABILITATIVE SERVICES

DIVISION FOR AGING SERVICES

WE ARE HERE



January:

Draft Amendments
for AAA and DARS
Leadership Input

February:

Send Draft to SHHR
and ORM for
Review

March:

Submit Amended
State Plan on Town
Hall

April:

30-Day Public
Comment Period &
Virtual Public
Hearing

AAA = Area Agency on Aging

DARS = Department for Aging and Rehabilitative Services

ORM = Office of Regulatory Management

SHHR = Secretary of Health and Human Resources

Timeline Continued



Public Comment Period



DARS is hosting a 30-Day Public Comment Period on the draft amended State Plan from March 24 to April 23, 2025

- To make a public comment via the Town Hall website, please visit:
<https://townhall.virginia.gov/L/GDocForum.cfm?GDocForumID=2688>
- Written public comments may also be submitted:
 - Via Mail: DARS, C/O Charlotte Arbogast, 8004 Franklin Farms Drive, Henrico, VA 23229
 - Via Email: StateAgingPlan@dars.virginia.gov
 - Via Fax: (804) 662-7663



Virtual Public Hearing



DARS will also be hosting a Virtual Public Hearing on the draft amended State Plan on:

Friday, April 11, 2025 at 1:00 P.M.

- To register for the Virtual Public Hearing please visit: https://dsa-virginia.zoomgov.com/webinar/register/WN_HLTAjJClQ9uOXMHjElpEuw
- The Virtual Public Hearing will include live captioning and ASL interpretation
- If you have questions or need additional accommodations, please email stateagingplan@dars.virginia.gov or call (804) 662-7093



DARS Materials & Promotion



- More information about the Draft Amended State Plan for Aging Services and the public input process is posted on the State Plan webpage here: <https://vda.virginia.gov/stateplans.htm>
- DARS will be promoting the public input process through:
 - DAS 'On the Same Page' newsletter
 - DARS' social media
 - DAS Advisory Boards
 - Direct email distribution to interested organizations



Help Get the Word Out!

- Please help us distribute information about the public input process
- You can use our handout!





Intrastate Funding Formula (IFF)

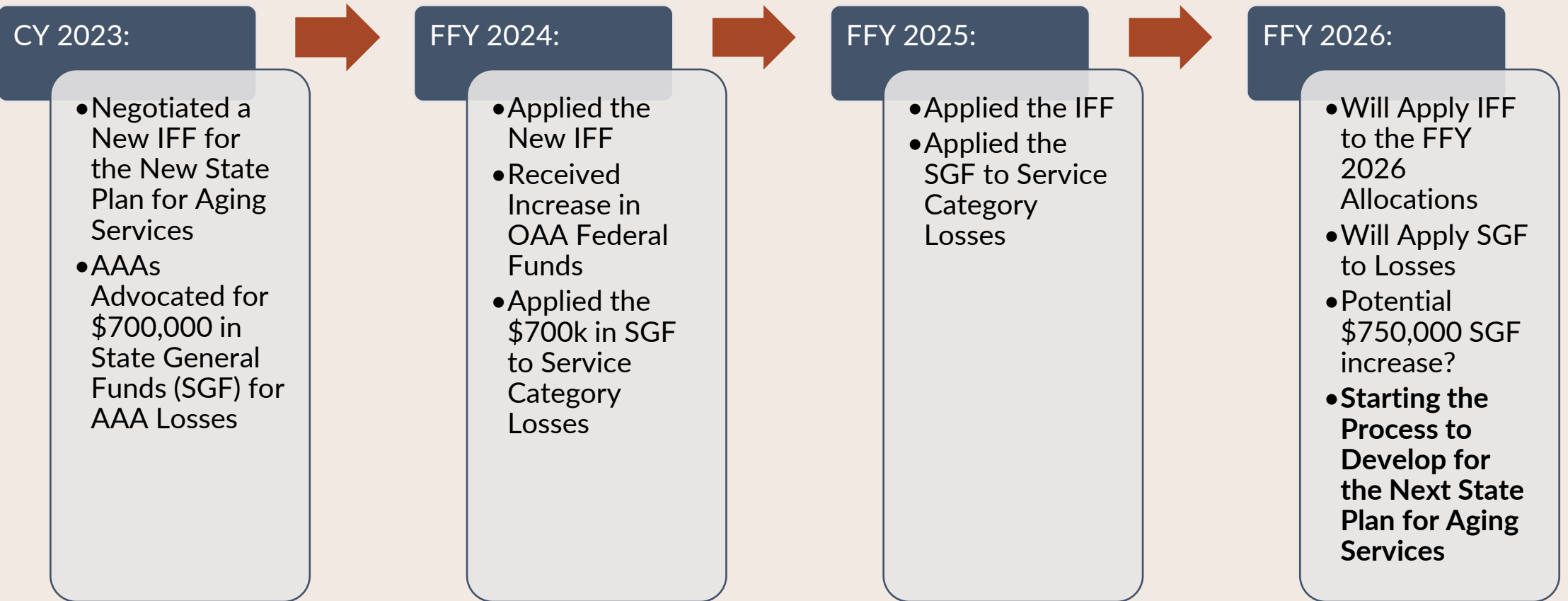
Touch Base

Intrastate Funding Formula (IFF)



VIRGINIA DEPARTMENT FOR AGING
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Next State Plan: IFF Decision



- For the next State Plan for Aging Services, DARS intends to:

Retain Existing IFF through FFYs 2026-2028

- This will allow us to have a few more years to see how the IFF will continue to unfold
- Current IFF includes rolling base which allows funding to AAAs to trend over time
- No new federal OAA funds are expected and there is potential for funding cuts
- The \$700,000 in State General Funds (SGF) has been sufficient thus far to absorb AAA losses
- TBD: Potential \$750,000 increase in SGFs for AAAs, which would be run through the IFF

Current IFF Structure Complies with new ACL State Plan Requirements

- No formula changes would be needed for the next State Plan for Aging Services
- DARS would just need to update the latest population & funding estimates

Option to Revisit the IFF after Submitting the Next State Plan

- After the new State Plan takes effect (October 1, 2027-September 30, 2031), DARS and the AAAS can spend more focused time on examining the data & exploring future options

AAAs:
What do
you
think?



Area Plan Overview

Rollout and Development Timeline

What Makes Up the Area Plan?



1. AREA PLAN PROGRAM

- Provides Background on the AAA
- Summarizes the PSA and Community Needs
- Identifies AAA Services to be Provided

2. AREA PLAN BUDGET

- Identifies Allocations for OAA and State-Funded Services

Due
August 1

Most of the Area Plan content requirements are derived from 45 CFR § 1321.65

Initial Area Plan Rollout

- March 14 Email Sent to Executive Directors and Seconds-in-Command
- Documents Found in the Aging Services Provider Portal under Area Plan

Distribution



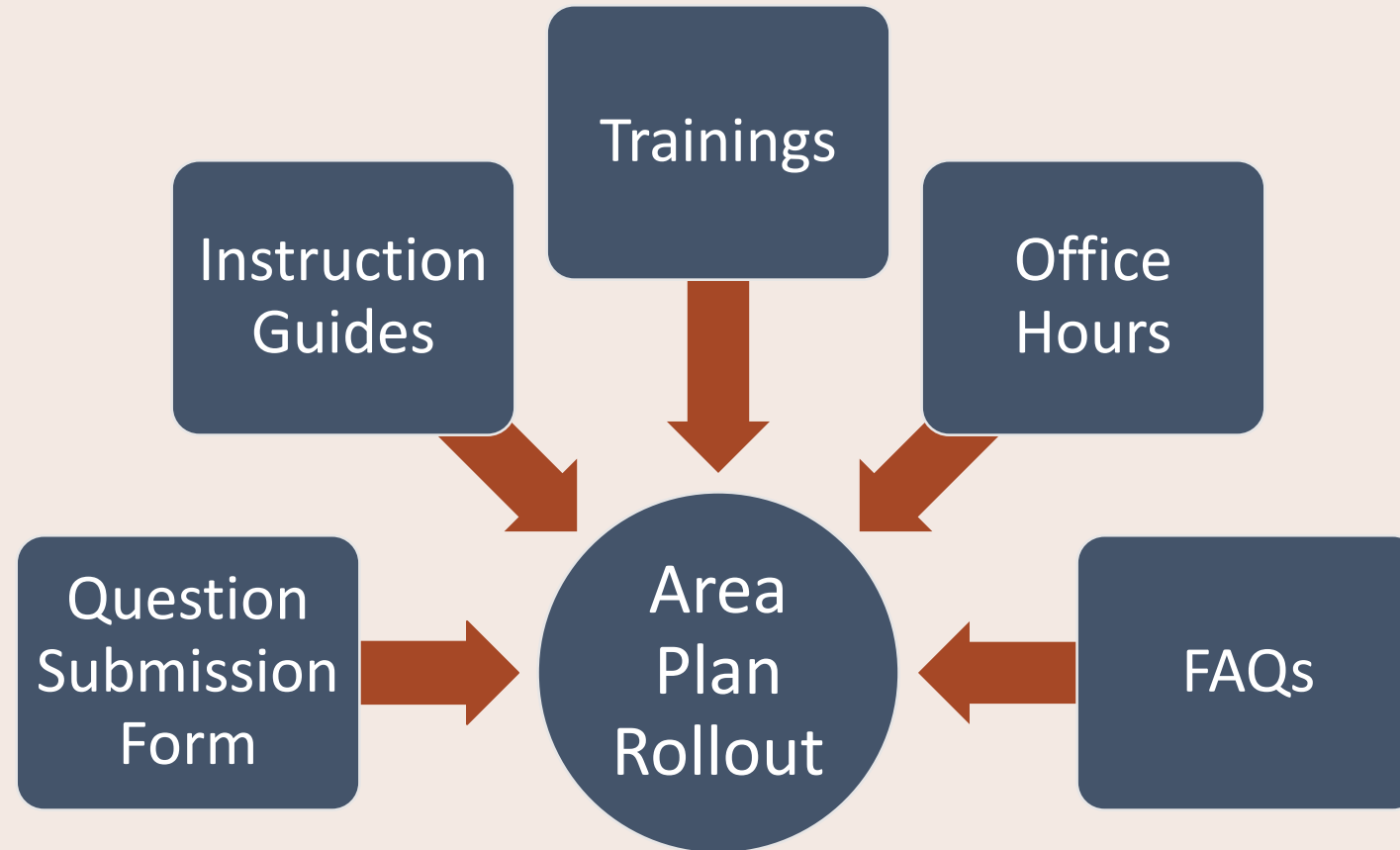
- Area Plan Program Template
- Area Plan Training Matrix
- Area Plan Training and Rollout Timeline
- Area Plan Training Summary
- Microsoft Online Form to Submit Questions (Link)

Documents



NOTE: Please pull down the latest version of the Area Plan

Rollout Modalities



DARS Area Plan Rollout



March 14

- Release the Area Plan Program Template
- Open Link to a Microsoft Form for AAAs to Submit Questions to DARS
- Launch Links for Training Webinars and Zoom Meeting Office Hours

April – May – June

- Release Area Plan Program Instruction Guide
- Host Area Plan Program Trainings
- Host Area Plan Program Office Hours

June

- Release Area Plan Budget Instruction Guide
- Release Each AAA's Budget Allocations
- Host Area Plan Budget Training
- Host Area Plan Budget Office Hours

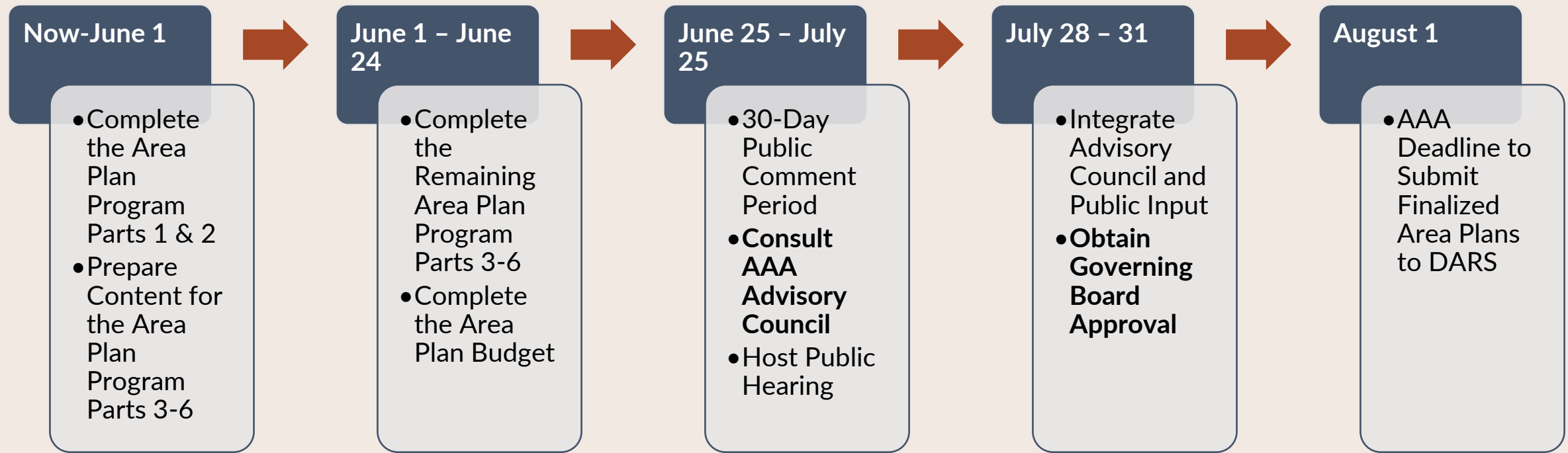
FAQs will be released periodically from April - June



AAA Area Plan Development



AAAs should follow the timeline outlined below to develop their Area Plans:



As you are planning ahead, consider if you need to adjust your Governing Board or Advisory Council meeting dates.



Annual Documents and Emergency Preparedness Tools

Rollout and Development Timeline

Other AAA Documents

EMERGENCY PREPAREDNESS DOCUMENTS

- Continuity of Operations Plan (COOP)
- All-Hazards Risk Assessment
- All-Hazards Emergency Response Plan

**Due
October
1, 2025**

ANNUALLY REQUIRED DOCUMENTS

- AAA Information Forms
- Key Staff, Governing Board & Advisory Council Information

**Due
February
1, 2026**

Other AAA Documents Rollout



DARS Rollout

- July 1: Release the Annual Documents and Emergency Preparedness Tools
- These documents are NOT subject to the Area Plan public input process

July – August

- Host Annual Documents & Emergency Preparedness Tools Training
- Host Annual Documents & Emergency Preparedness Tools Office Hours

October 1

- Emergency Preparedness Documents are due October 1 each year (starting in 2025)

February 1

- AAA Annual Documents are due February 1 each year (starting in 2026)



No Wrong Door Documents

No Wrong Door (NWD)



BEFORE



NOW

THROUGH THE AREA PLAN

- NWD Local Advisory Council Information (Members and Structure)
- NWD Local Standards (Matrix)

THROUGH ANNUAL DOCUMENTS

- **For 2025:** DARS will collect updated versions of the NWD documents in the spring/summer 2025 (exact dates TBD)
 - The End User Audit will also be part of this
 - Stay tuned for more information
- **Starting in 2026:** The NWD documents will be included in the Annually Required Documents that are due each year on February 1st



AAA Document Submission Portal

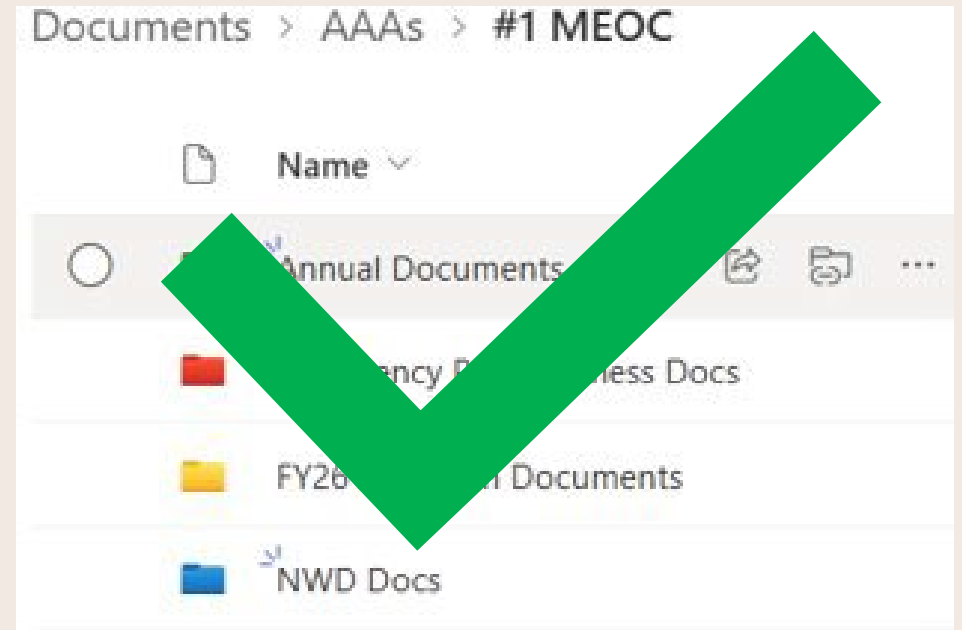
Submitting Area Plan Documents

Old Way

Email to Tanya Brinkley



New Way



Submit to the SharePoint Folder



VIRGINIA DEPARTMENT FOR AGING
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DIVISION FOR AGING SERVICES

FFY26 Area Plan

AUGUST 1

Area Plan Program

Area Plan Budget

Any Supporting
Documents

Annual Documents: Emergency Preparedness Documents

OCTOBER 1

Continuity of Operations
Plan

All-Hazards Emergency
Response Plan

All-Hazard Risk
Assessment

Annual Documents: AAA Operations

FEBRUARY 1

AAA Information Form

Governing Board Docs

Advisory Council Docs

Organizational Chart

Staff Listing

Annual Documents: No Wrong Door*

FEBRUARY 1

NWD Local Advisory
Council Information
(Members and Structure)

NWD Local Standards
(Matrix)

*For 2025, DARS will collect updated versions this spring/summer - stay tuned for more information



Home Delivered Meals: Infrequent Delivery (HDM-ID) Waiver

Policies and Area Plan Updates

OAA Requirement



- Section 336 of the Older Americans Act (42 U.S.C. § 3030f):
- Program authorized
 - The Assistant Secretary shall establish and carry out a program to make grants to States under State plans approved under section 3027 of this title for the establishment and operation of nutrition projects for older individuals that provide-
 - (1) on 5 or more days a week (**except in a rural area where such frequency is not feasible** (as defined by the Assistant Secretary by rule) and a lesser frequency is approved by the State agency) at least 1 home delivered meal per day, which may consist of hot, cold, frozen, dried, canned, or fresh foods and, as appropriate, supplemental foods, and any additional meals that the recipient of a grant or contract under this subpart elects to provide; and
 - (2) nutrition education, nutrition counseling, and other nutrition services, as appropriate, based on the needs of meal recipients.

OAA Context/Rationale



VIRGINIA DEPARTMENT FOR AGING
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HDM Generally:

- Nutritional: Healthy Meals Provided
- Social: Interaction to Prevent Isolation
- Safety: Well-Being Checks
- Functional: Increased Access to Other Services

HDM-ID Needs:

- Rural Clients are Widely Dispersed Across Geographic Areas
- There are Costs Associated with Increased Delivery Distance and Time
- There are Food Safety Considerations



HOWEVER:

Regular HDM delivery should continue to be the standard practice.

HDM-ID Waivers are “waivers” for a reason.

DARS HDM-ID Policy



Which AAAs are Eligible for the HDM-ID Waiver?

- AAAs must have at least 50 percent of the localities within the PSA defined as rural using the 'rural' criterion from the Intrastate Funding Formula (IFF)
 - This will be determined each year when the IFF factors are calculated for the upcoming FFY allocations
 - DARS will notify AAAs annually prior to the Area Plan development process of any changes to their rural status
- This criterion follows the same rural criterion used for <5 Day Congregate Meal Site Waiver eligibility

When is an HDM-ID Waiver Required?

- Eligible AAAs (above) that deliver HDMs less than weekly to 25% or more of their total HDM participants must seek and obtain a HDM-ID Waiver from DARS

AAA Area Plan Updates

CURRENT PROCESS

- HDM-ID Waivers Are Not Part of the Area Plan
- HDM-ID Waivers Can Be Requested and Are Reviewed on a Rolling Basis
- HDM-ID Plan Must Be Submitted with Relevant Documents upon Request to DARS for Review and Approval



NEW PROCESS

- Area Plan Includes HDM-ID Waiver Request Form
- HDM-ID Waiver Requests Include a Synopsis of HDM-ID Intentions and Operations
 - HDM-ID Waiver Request is Subject to the Area Plan Public Input Process
- HDM-ID Implementation Plan Submitted with Relevant Documents to DARS for Review along with Area Plan Submission
 - These Materials Are Not Subject to the Area Plan Public Input Process, but Still Available for Public Inspection if Requested

HDM-ID Documents

HDM-ID Waiver
Request Form

- Used to request a new HDM-ID Waiver or to renew an existing HDM-ID Waiver

HDM-ID
Implementation
Plan

- Used to provide additional details to DARS about the AAA's implementation of HDM-ID

HDM-ID
Transition Plan

- Used for AAAs that need to unwind an existing HDM-ID program by the next Area Plan Cycle

Area Plan HDM-ID Content



- In the updated Area Plan, HDM-ID Waiver Requests will need to:
 - Identify the localities, method of delivery, and frequency
 - Include the number of individuals receiving HDMs and expected to receive HDM-ID (with an auto-calculation that would total more than 25%)
 - Identify key activities related to vulnerable participants, social isolation, and interfaces with other Nutrition Services Programs
 - Describe the process to monitor and evaluate the successful implementation of HDM-ID
- Additional Documents Required:
 - HDM-ID Implementation Plan
 - AAA Registered Dietitian Nutrient Analysis/Meal Pattern documentation
 - Governing Board (GB) & Advisory Council (AC) Approved HDM-ID Policy or Minutes from the GB and AC Meetings that Outlined the HDM-ID Policy
 - Current Food Vendor Contract/Agreement (for Waiver Renewals)
 - Commercial Package Delivery Procedures (if applicable)

Waiver Validity and Expiration



- DARS-Approved HDM-ID Waivers will be valid for the duration of the Area Plan Cycle:
 - Unless the AAA opts to return to standard HDM delivery OR unless DARS has concerns with the AAA's implementation of the HDM-ID Program AND
 - Regardless of the AAA's 50% rural designation status for duration of the Area Plan Cycle
 - However, if the AAA's rural locality designations fall below 50%, the AAA must submit an HDM-ID Transition Plan with their next annual Area Plan submission that outlines how the AAA will come into compliance with the HDM requirements by the next Area Plan Cycle

AAA Impacts



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DARS is Going to Outline the Transition Process



9 AAAs

Not Eligible
for a
Waiver



4 AAAs

Currently
Eligible but
No Waiver
Needed



6 AAAs

Currently
Eligible
with an
Approved
Waiver &
Still Eligible

6 AAAs

No Longer
Eligible, but
Currently
Have a
Waiver

Scenario 1

- This scenario would apply to the 9 AAAs that are not eligible for a waiver
- AAA1 should continue to provide HDMs under the regular HDM Service Standard.
- AAA1 will outline how they provide HDM in their Area Plan.
- AAA1 should not complete the HDM-ID Waiver Request form with their Area Plan.

Scenario 2

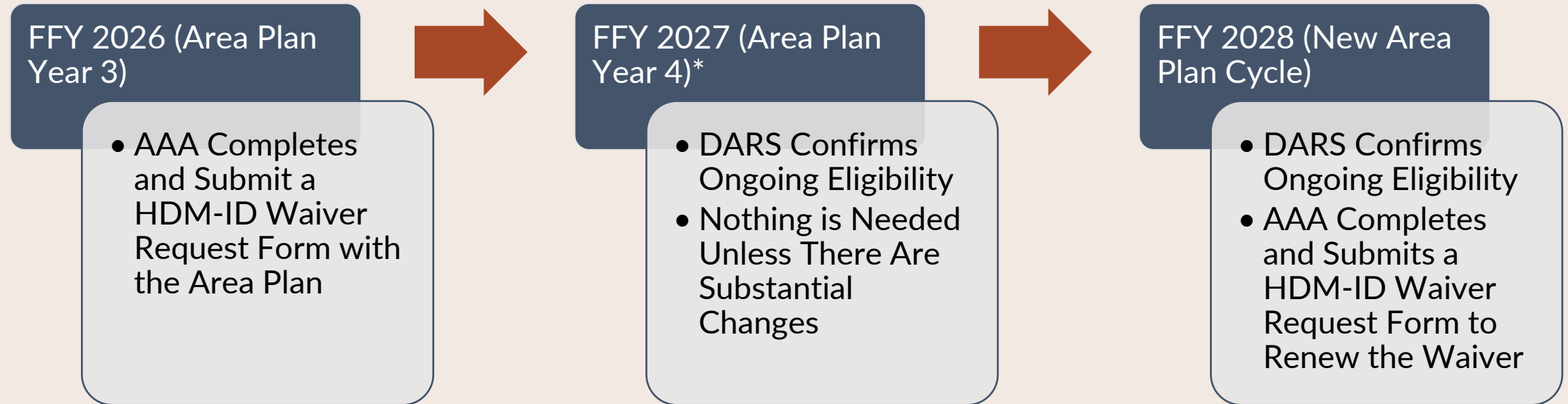


- This applies to the 6 AAAs that are Currently Eligible and have HDM-ID Waivers approved by DARS
- AAA2 has an existing approved HDM-ID Waiver from DARS and has maintained its rural locality designations above the 50% requirement going into the next Area Plan year.
 - For the current Area Plan Cycle, AAA2 must complete a new HDM-ID Waiver Request Form through the Area Plan
 - DARS expects to continue its approval for AAA2's HDM-ID program through the duration of the current Area Plan Cycle (FFY 2026 & FFY 2027)*
 - In future Area Plan Cycles, AAA2 would submit an HDM-ID Waiver Request Form in Year 1 of the Area Plan Cycle only

*unless there are extenuating circumstances or DARS has concerns about the service provision

Scenario 2 Transition Illustrated

- This applies to the 6 AAAs that are Currently Eligible and have HDM-ID Waivers approved by DARS



Scenario 3

- This scenario would apply to the 4 AAAs that are eligible for the HDM-ID Waiver but do not need a HDM-ID Waiver
- If AAA3 wants to continue to provide HDMs under the regular HDM Service Standard, AAA3 should follow the same steps under Scenario 1 for AAA1 (i.e., Complete the HDM Service page in the Area Plan and do NOT complete the HDM-ID Waiver Request)
- If AAA3 decides it needs to request a HDM-ID Waiver to change how it provides HDMs, AAA3 should follow the steps outlined in the next scenario (Scenario 4 for AAA4)

Scenario 4

- This is a hypothetical scenario
- AAA4 decides to seek approval for a HDM-ID Waiver in the middle of an Area Plan Cycle (Years 2, 3, or 4)
 - AAA4 submits an HDM-ID Waiver Request Form to DARS with their next Area Plan submission
 - If approved, AAA4's HDM-ID Waiver would be valid the duration of the current Area Plan Cycle
 - AAA4 must submit a new HDM-ID Waiver Request Form for Year 1 of the next Area Plan Cycle

Scenario 5

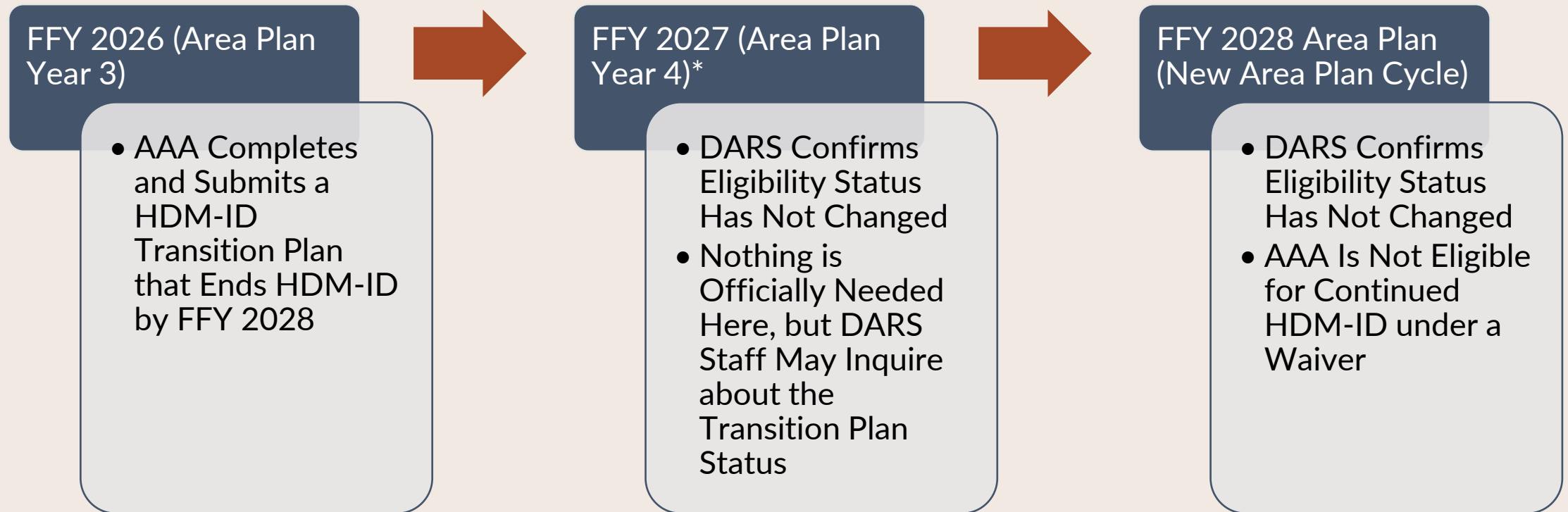


- This applies to the 6 AAAs that are no longer eligible for an HDM-ID Waiver
- AAA5 goes into a new Area Plan Cycle with at least 50% of its localities meeting the rural designation, at which time AAA5 sought and received DARS approval for a HDM-ID Waiver. In starting the process to plan for Year 3* of the Area Plan, however, AAA5 falls below the 50% rural requirement.
 - DARS notifies AAA5 that it has fallen below the rural requirement
 - AAA5 submits an ID-HDM Transition Plan to DARS for the Year 3 Area Plan
 - If approved by DARS, AAA5 can continue to operate its ID-HDM program in Years 3-4
 - DARS and AAA5 continue to monitor rural locality designations on an annual basis for any changes
 - AAA5 must be in compliance with the HDM requirements by the next Area Plan Cycle; AAA5 is not eligible for an HDM-ID Waiver in the next Area Plan Cycle

*This would also apply if the scenario indicated the AAA fell below the requirement in planning for Year 2 of the Area Plan.

Scenario 5 Transition Illustrated

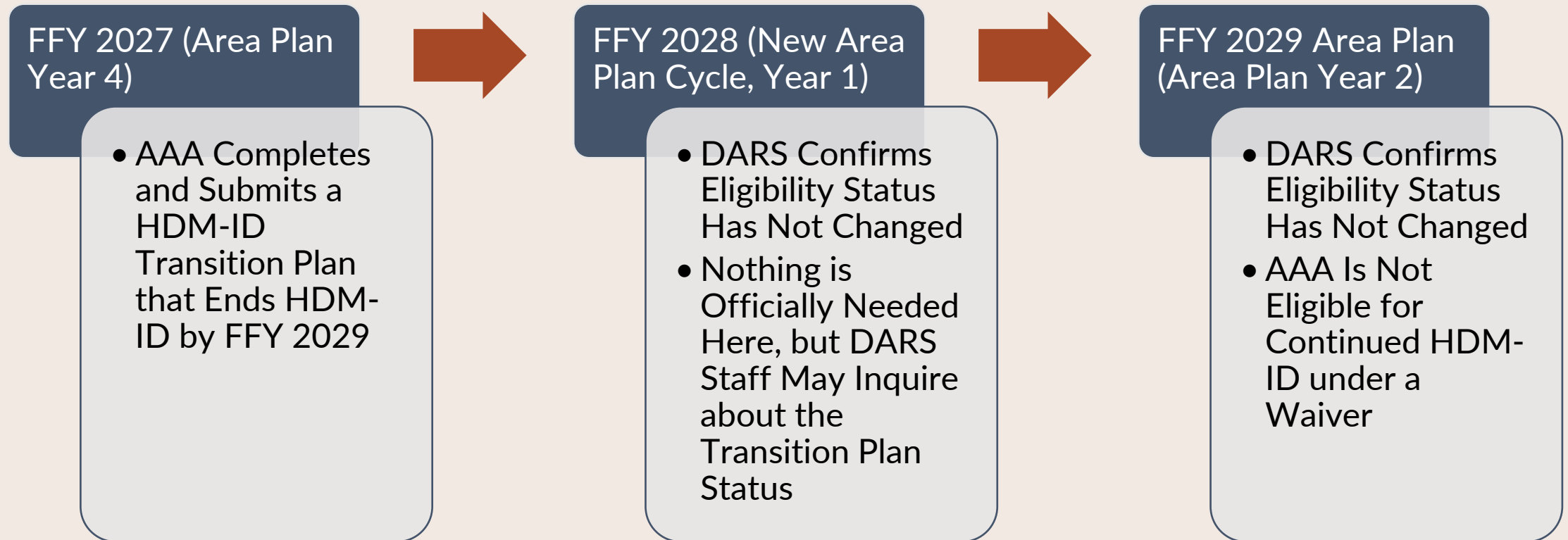
- For the 6 AAAs* that are no longer eligible for an HDM-ID Waiver:



Scenario 6

- This is a hypothetical scenario that could occur in FFY 2027
- AAA6 has a DARS-approved HDM-ID Waiver for the current Area Plan Cycle. In starting the process to plan for Year 4 of the Area Plan, AAA6 falls below the 50% rural requirement.
 - DARS notifies AAA6 that it has fallen below the rural requirement
 - AAA6 submits an HDM-ID Transition Plan to DARS for the Year 4 Area Plan
 - AAA6 can continue to operate its HDM-ID program in Year 4 of the current Area Plan Cycle and in Year 1 of the next Area Plan Cycle
 - DARS and AAA6 continue to monitor rural locality designations on an annual basis
 - AAA6 must be in compliance with the HDM requirements by Year 2 of the next Area Plan Cycle; AAA6 is not eligible for an HDM-ID Waiver in Year 2

Scenario 6 Transition Illustrated





Questions?

Wrap-Up



- Promote Public Input Process for the Draft Amended State Plan for Aging Services
- Start Review and Development of Your Area Plan
 - Submit Area Plan Questions using the Microsoft Form
 - Register for the Area Plan Trainings
 - Add the Area Plan Office Hours to Your Calendars
 - Consider Governing Board & Advisory Council Meeting Schedules
- Next AAA Input Session: Tuesday, April 22 from 3-4:00 PM