



# AAA Input Session

August 20, 2025



**DARS** | VIRGINIA DEPARTMENT FOR AGING  
AND REHABILITATIVE SERVICES  
**DIVISION FOR AGING SERVICES**

# Agenda

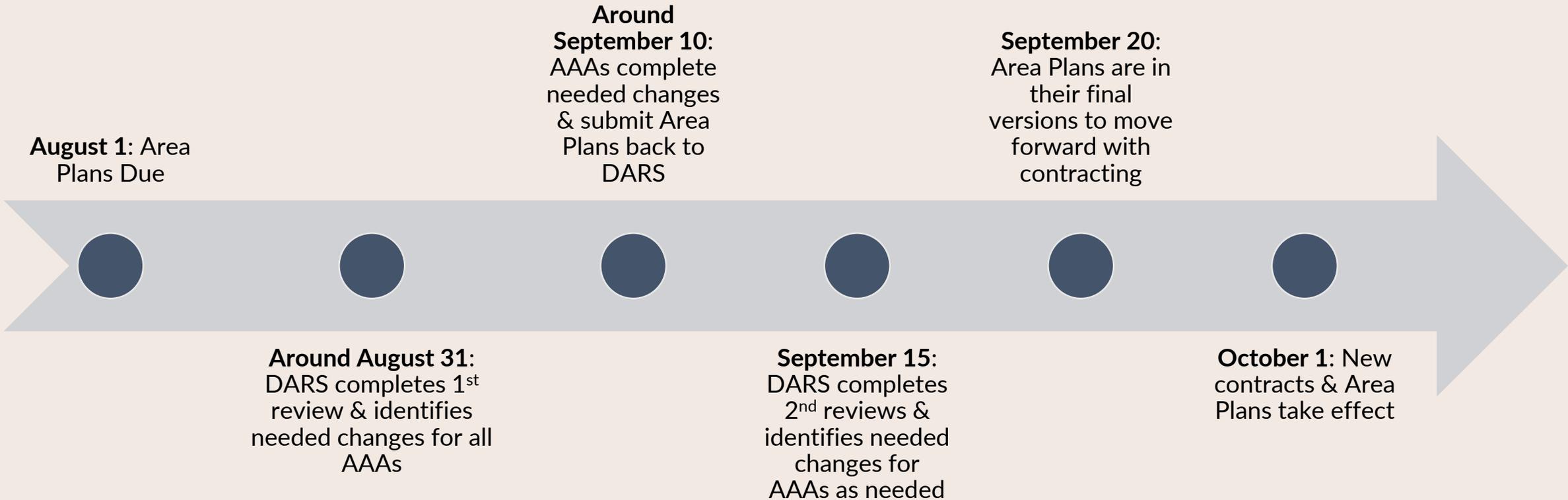
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- Welcome from Commissioner Hayfield
- Area Plan Review – Updates
- State Plan for Aging Services – Status Update
- NCI-AD Survey – Updates
- Draft Corrective Action Plan (CAP) – Overview
- September 17 AAA Input Session – Poll
- Wrap-Up & Reminders



# Area Plan Submission & Review: Updates

# Area Plan Review Timeline



# Area Plan Review: Details



- On August 4, each agency's Area Plans were locked for further editing while DARS staff conducts its initial review.
  - If the AAA submitted a Part A and B, they were merged
  - The Area Plan files were renamed to **"PSA# FY26 Area Plan-Original"**
- DARS staff created a duplicate PDF copy of the Area Plan submission that will be marked up with any feedback, questions or clarifications for your agency to address as a part of the review process.
  - This version will be called **"PSA# FY26 Area Plan-Markup"**
- Once DARS has finished the initial review, the Area Plan-Markup version will be uploaded into the same folder as the original, and the Area Plan-Original version will be unlocked for editing.
  - The individuals in your agency's **SharePoint Group** will be notified at that time if there are any edits or feedback that is required.

# Area Plan Review: Details



- If feedback and edits are required, those should be made in the Area Plan-Original version but the edited document should be saved as **“PSA# FY26 Area Plan- Version 2.”** This will help create a version history that tracks changes as they are made by both the AAA and DARS.
  - Once your agency has submitted its edits and/or feedback, email Nick Slentz to notify him that changes are ready for secondary review.
- During secondary review, DARS staff will note in the Area Plan-Markup version if everything has been adequately addressed or still has outstanding items. If there are still outstanding items, once they are addressed, Area Plan- Version 2 should be saved as **“PSA# FY26 Area Plan-Version 3.”**
  - This process will continue until all items have been resolved.
- Once the review process has concluded, the current “Area Plan- Version #” will be renamed to **“PSA# FY26 Area Plan- Final”** and combined with the **“Area Plan Contract”** for execution by October 1, 2025.

# Area Plan Budget Review

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- Initial Area Plan Budget Review is almost complete.
- Almost all AAAs have satisfied all requirements on the Requirements tab (MAP, units, carryover requirements, etc.)
- Once all requirements have been satisfied, the budget file will be renamed to **“PSA # Area Plan Budget FY26- Approved”**
  - This does not mean it is fully approved
  - **There may be some additional changes required** based on the Area Plan Programs review—such as adding/subtracting units or people served, shifting funding to other programs and/or defining a unit type.



# State Plan for Aging Services

# Amended State Plan



## Virginia State Plan for **AGING SERVICES**

October 1, 2023 - September 30, 2027

AMENDED FOR OCTOBER 1, 2025



- Virginia officially submitted the final amended State Plan for Aging Services to the Administration for Community Living (ACL) Central Office on June 30, 2025.
- We received approvals from Secretary Kelly and Governor Youngkin.
- From the published draft version, DARS included Attachment E: Evidence of Public Comment, and made some adjustments to the Appendices.
- DARS will keep you posted on the ACL Central Office review and hopefully forthcoming approval.



# Next State Plan Needs Assessment: NCI-AD

# NCI-AD

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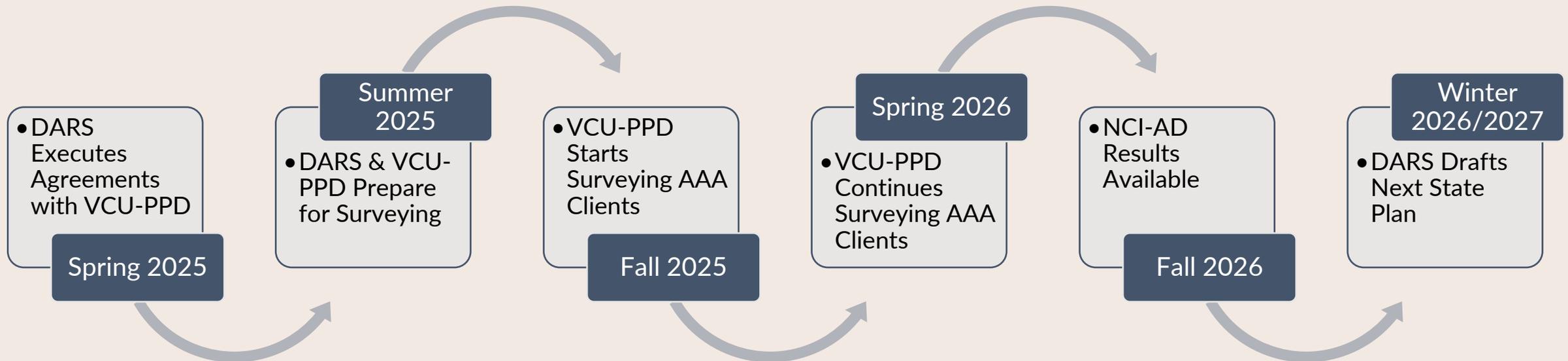


- National Core Indicators for Aging and Disabilities (NCI-AD)
- Initiative from ADvancing States and the Human Services Research Institute (HSRI)
- You can learn more about NCI-AD here: <https://nci-ad.org/>



# NCI-AD Timeline

DARS is partnering with the VCU Partnership for People with Disabilities (VCU-PPD) to conduct roughly 600 telephonic surveys of Older Americans Act (OAA) clients across Virginia during the fall of 2025 and the spring of 2026. NCI-AD has a 15-18 month start-to-finish implementation timeline.



# Engaging Clients

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- AAA clients are eligible to be included in the NCI-AD survey sample if they receive 1 or more of the following services, in any combination, at least 8 instances per month for 2 consecutive months (likely during June and July 2025): Congregate Nutrition, Home Delivered Nutrition, Transportation, Adult Day Services, Personal Care, Chore Services, and Homemaker Services
- AAA clients will be randomly selected to participate
- AAA clients will receive a mailed Engagement Letter first
- VCU-PPD will then follow-up with phone calls to the clients
- DARS is also developing a general flyer to be used by the AAA for increasing awareness of and credibility for the survey

# AAA NCI-AD Liaisons

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- DARS has identified a **Designated NCI-AD Liaison** from each AAA to help with the implementation of the survey
  - Provide input
  - Promote the survey
  - Provide survey credibility
  - Assist with troubleshooting survey hiccups
  - Address identified unmet client needs
- AAA NCI-AD Liaisons have access to PeerPlace and information about the AAA's clients (e.g., contact information, services used)

# NCI-AD Preparation Work



## Contracts, Agreement and Data Sharing

- DARS drafted a contract & data sharing agreement for VCU
- VCU is reviewing the contract & data sharing agreement
- Once signed, DARS will work with VCU to share the necessary data so that VCU can work on pulling the survey sample
- VCU is hoping to start contacting clients and surveying in late September

## Training, Promotion & Credibility

- DARS provided training materials on OAA/AAA services to VCU for their surveyors
- DARS shared the AAA NCI-AD Liaisons Contact List with VCU
- DARS is hosting a training for the AAA NCI-AD Liaisons on the survey process on August 28
- DARS will be asking AAA NCI-AD Liaisons to help promote and communicate the survey to AAA clients for credibility

# AAA Liaison Training

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- When: Thursday, August 28, 2025 from 10:00 – 11:00 AM
- The AAA Liaison Training will cover:
  - Background on the NCI-AD Consumer Adult Survey
  - Impetus for Implementing NCI-AD in Virginia
  - Overview of the NCI-AD Survey Questions + DARS Additional Questions
  - VCU's Role and Activities
  - Implementation Process and Timeline
  - Unmet Needs Process
  - Materials to Help Promote the Survey
  - Time for Q&A
- The webinar will be recorded, and the slides and recording will be sent out afterwards
- To join the webinar, use this link:

<https://dsa-virginia.zoomgov.com/j/1610026774>



# OAA Final Rule: Corrective Action Plan

# ACL Requirement

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- If a state is not able to come into compliance with the OAA Final Rule by October 1, 2025, State Units on Aging (SUA) are required to submit a Corrective Action Plan (CAP) to the U.S. Administration for Community Living (ACL) by October 1, 2025.
- SUAs must submit CAPs via email for ACL's consideration and approval.

# CAP Cover Letter

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- CAPs must be accompanied by a cover letter signed by the highest-ranking government official of the grantee (i.e., Commissioner).
- In an ACL webinar held on October 29, 2024, ACL also indicated the cover letter must be signed by the State Long-Term Care (LTC) Ombudsman if the state's CAP also includes delayed compliance with the OAA Final Rule's LTC Ombudsman regulatory provisions.

# Cover Letter Continued

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- The CAP Cover Letter must include:
  - 1. Written confirmation that the grantee will:
    - Use good faith efforts to fully comply with the applicable requirement(s);
    - Collaborate with ACL in the finalization of the CAP (e.g., identification of progress milestones and a feasible timeline for the grantee to come into compliance); and
    - Provide written updates to ACL as to the status of the action steps to be taken under the CAP, as agreed to by the parties and as otherwise requested by ACL.
  - 2. The projected date by which the grantee will fully comply with the applicable requirement(s)

# CAP Template

- ACL also issued a CAP template for states to use:

**CORRECTIVE ACTION PLAN**

The purpose of this Corrective Action Plan is to establish a comprehensive plan with a feasible timeline for a grantee to come into compliance with one or more of the terms and conditions contained in a Notice of Award issued under [insert statute or other authorization for issuance of the NoA], with respect to the issue(s) identified below.

**GRANTEE:**

	A	B	C	D	E
	SPECIFIC TERM/CONDITION	COMPLIANCE ISSUE AND SPECIFIC EXPLANATION OF NEED FOR TIME TO COMPLY	GRANTEE'S ACTION STEPS TO ADDRESS COMPLIANCE ISSUE(S) WITH PROJECTED COMPLETION DATE FOR EACH STEP	PROJECTED COMPLIANCE DATE	STATUS/COMMENTS
1					
2					

# ACL CAP Elements

## Column A:

- Insert the specific regulatory requirement with respect to which the grantee is out of compliance.

## Column B:

- Explain: (1) how the grantee is out of compliance with the specific requirement referred to in Column A, (2) the amount of time the grantee will need to comply with the applicable requirement, and (c) why that amount of time will be needed.

## Column C:

- Set forth the action steps to be taken by the grantee to remedy the non-compliance issue. For each action step, also include the date by which that action step is projected to be completed.

## Column D:

- The projected date by which the grantee will be in compliance with the section listed in Column A should be inserted here.

## Column E:

- This space should be used for updates as to the status of the grantee's efforts to resolve the noncompliance issue.

# Virginia's CAP Draft

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- In conversations with Kari Benson, Deputy Assistant Secretary for Aging, and Amy Wiatr-Rodriguez, former Director of the ACL Center for Regional Operations, on April 28, 2025, DARS inquired about the potential to use an alternative format for Virginia's CAP.
- Both indicated that ACL would accept an alternative format as long as it included all the required elements in the ACL-issued CAP Template.
- We are going to try that first, but we can always revert to the ACL CAP Template if needed.

# Policy Tools: Compliant

- DARS has concluded that the following policy tools are compliant with the OAA Final Rule and a CAP is not needed for these items:

No Changes Needed:

Appropriation Act

Code of  
Virginia/State Statute

Changes Have Been  
Completed:

State Plan for Aging  
Services

AAA Area Plans

# Policy Tools: Non-Compliant



- DARS has concluded that the following policy tools are NOT compliant with the OAA Final Rule and a CAP is needed:

## State Regulations

- 22VAC30-60 Grants to Area Agencies on Aging

## Contract

- DARS/AAA Contract

## DAS Policies / Guidance Documents

- NEW: SUA Manual
- VDA Grants Manual
- AAA Service Standards
- AAA Board & Council Handbook
- Monitoring P & Ps and Tools

## Office of the State Long-Term Care Ombudsman Program

- 22VAC30-60 Grants to Area Agencies on Aging
- Policies & Procedures
- MOUs/MOAs

# Rationale for Extra Time

## Regulatory Process

- Proposed & Final Regulation stages, each require:
  - OAG Approval
  - DPB Approval
  - SHHR Approval
  - ORM Approval
  - Governor Approval
  - Public Comment Periods

## Contracting Process

- DAS Drafting
- OAG Review (as needed)
- DARS Procurement Approval

## Guidance Document Process

- SHHR Approval
- ORM Approval
- Public Comment Period

NOTE: DARS will also build in time to solicit input from AAAs on these policy tools

# Projected Compliance Date



- Whereas—
  - Non-compliant items interface with each other (for example, the DARS/AAA Contract incorporates/references some content from state regulations and the DAS Policies & Procedures expand on some content in state regulations) AND
  - The current/future cycle for the DARS/AAA Contract and Area Plan Process (i.e., we are approaching Year 3 of a four-year cycle now)
- Therefore—
  - DARS has set a projected compliance date for Virginia as:

October 1, 2027

# 22VAC30-60 Regulations

## ■ Background:

### Regulatory History

- History is similar to the federal OAA regulations
- Issued in the late 1980s
- Not updated substantially since

### Recent Efforts

- In 2019, DARS completed a Periodic Review with an “Amend” finding
- DARS issued a NOIRA (Notice of Intended Regulatory Action)
- DARS convened a RAP (Regulatory Action Panel) with AAA representatives
- COVID-19 pandemic hit, and then new federal regulations were issued

# 22VAC30-60 Regulations cont.



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- Due to the extent of changes required, DARS plans to repeal the existing 22VAC30-60 and issue a new 22VAC30-61

## CFR Components

- Definitions
- CFR provisions around Designations of PSAs and AAAs
- (Lots of generally outdated content; e.g., content comparable to 45 CFR Part 74)
- 45 CFR Part 1324 Subpart A – State LTC Ombudsman Program

## Compliance Plan: Proposed Regulations

- DARS drafts Proposed Regulations
- DARS convenes a RAP for input
- Executive Branch Review
- Publication & Public Comment Period

## Compliance Plan: Final Regulations

- DARS drafts potential changes since Proposed Regulations
- Executive Branch Review
- Publication & Public Comment Period
- Effective by October 1, 2027

# DARS/AAA Contract

## CFR Components

- 1321.55 - Mission of the area agency
- 1321.57 - Organization and staffing of the area agency
- 1321.71 - Purpose of service allotments under Title III
- 1321.73 - Policies and procedures

## Other Intentions

- Clean up organization and structure
- Consolidate/streamline NWD provisions
- Include appropriate references that capture and align with other policy tools
- Reduce/eliminate redundant or confusing content

## Compliance Plan

- DAS drafts new/updated contract
- DAS consults DARS Procurement and OAG
- DARS previews new/updated contract with AAAs
- DARS issues new contracts that start October 1, 2027

# New: SUA Manual

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- This would be a new document
- Essentially, it would be DARS-DAS' internal "Standard Operating Procedures"
- Reflective of items that happen internally at DARS
- Will not include any requirements of AAAs
- DARS' current practices are consistent with the OAA Final Rule provisions, but DARS lacks documented policies and procedures that reflect those practices
- This would not be subject to the APA Guidance Document process

# SUA Manual

## CFR Components – P & Ps needed for:

- 1321.9(c)(2) – IFF, Match, Transfers, MAP, MOE, Advance Funding, etc.
- 1321.9(c)(3) – State Plan process
- 1321.47 – COIs in the SUA
- 1321.71 – Purpose of Title III
- 1321.97, .99, .101 – Emergencies

## Compliance Plan

- DARS-DAS drafts Policies and Procedures
- DARS conducts internal review and approval process
- DARS shares the SUA Manual with the AAAs for input
- DARS finalizes the SUA Manual by October 1, 2027

# Grants Manual → AAA Manual

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- DARS will be taking the existing VDA Grants Manual and re-envisioning it as a new AAA Policy Manual
- The document will be re-titled, re-envisioned in scope and purpose, content will be updated, and new provisions will be added as needed
- The AAA Policy Manual will cover SUA expectations:
  - 1. For AAA operations and compliance
  - 2. For activities that involve both the SUA and the AAAs

# AAA Policy Manual



## CFR Components

- 1321.9(c)(2) – Program income, contracts & commercial relationships, buildings
- 1321.9(c)(4) & .65 – Area Plan process
- 1321.53, .69, & .95 – Title III & VI coordination
- 1321.59 & .67 - AAA P & Ps on COIs & monitoring service providers
- 1321.61 – Advocacy responsibilities
- 1321.75 – Confidentiality & disclosure
- 1321.73 – General P & Ps
- 1321.77 – Person-centered/trauma-informed services
- 1321.79 – Service provider responsibilities
- 1321.97 & .103 – Emergency preparedness

## Other Intentions

- Incorporate state law and regulatory requirements
- Incorporate state contractual requirements
- Repealing the standalone Criminal Record Check Policy and integrating it into the AAA Policy Manual
- Clean up organization and structure
- Include appropriate references that capture and align with other policy tools
- Reduce/eliminate redundant or confusing content

## Compliance Plan

- DARS drafts AAA Policy Manual
- DARS conducts internal review and approval process
- DARS shares the AAA Policy Manual with the AAAs for input
- DARS integrates AAA input as needed and obtains final agency approvals
- DARS seeks SHHR and ORM approval
- Publication & Public Comment Period
- Effective by October 1, 2027

# Aging Service Standards



- DARS will be updating the existing Aging Service Standards to include all the required elements related to service delivery

## CFR Components

- 1321.9(c)(1) – Direct Service Provision
- 1321.9(c)(2) – Voluntary Contributions & Cost Sharing
- 1321.81 – Client Eligibility
- 1321.83 – Client & Service Priority
- 1321.85 – Supportive Services
- 1321.87 – Nutrition Services
- 1321.89 – DPHP
- 1321.91 – NFCSP
- 1321.92 – Legal Assistance

## Indirect Actions

- DARS will be repealing the following existing P & Ps and integrating them into the Aging Service Standards:
  - Cost Sharing/Fee for Service Policy
  - NFCSP Guidance

## Compliance Plan

- DARS drafts updated Service Standards
- DARS conducts internal review and approval process
- DARS shares the Service Standards with the AAAs for input
- DARS integrates AAA input as needed and obtains final agency approvals
- DARS seeks SHHR and ORM approval
- Publication & Public Comment Period
- Effective by October 1, 2027

# Board & Council Handbook



- DARS will be updating the existing Board and Council Handbook to include OAA requirements and update expectations related to the operations of the Governing Boards & Advisory Councils:

## CFR Components

- 1321.55(b)(10) – Mission of the AAA
- 1321.63 – Area Agency Advisory Council

## Other Intentions

- DARS intends to update content generally, including, for example:
  - FOIA
  - COIs
  - Area Plan approval
- Clean up organization and structure
- Include appropriate references that capture and align with other policy tools
- Reduce/eliminate redundant or confusing content

## Compliance Plan

- DARS drafts updated Handbook
- DARS conducts internal review and approval process
- DARS shares the Handbook with the AAAs for input
- DARS integrates AAA input as needed and obtains final agency approvals
- DARS seeks SHHR and ORM approval
- Publication & Public Comment Period
- Effective by October 1, 2027

# Monitoring P & Ps & Tools



- DARS will be launching new Monitoring Policies & Procedures and Tools on October 1, 2027

## CFR

- 1321.9(a) – Monitoring Programmatic and Fiscal Performance

## Interim Processes

- DARS is restructuring the existing AAA Monitoring Tools to make them more user friendly and streamlined
- These restructured tools will be used through September 30, 2027

## CAP Next Steps

- They will integrate the new OAA Final Rule requirements as well as those from the other DARS Policy Tools (e.g., state regulations, DARS/AAA contracts, and P&Ps)
- Some items will be subject to SHHR/ORM review and public comment

# LTC Ombudsman P & Ps



## CFR Components

- 1321.9(a)(3) - The State LTC Ombudsman shall be responsible for monitoring the files, records, and other information maintained by the Ombudsman program
- General content regarding SUA and AAA compliance with 45 CFR Part 1321 and 45 CFR Part 1324

## Compliance Plan

- OSLTCO drafts revised P & Ps
- OSLTCO conducts internal review and approval process
- OSLTCO shares the P & Ps with the AAAs for input
- DARS integrates AAA input as needed
- OSLTCO seeks SHHR and ORM approval
- Publication & Public Comment Period
- Effective by October 1, 2027

# LTC Ombudsman MOUs



## CFR Components

- 1324.13(h)(1) – MOUs between the Ombudsman Program and:
  - Legal Assistance Programs and
  - Facility Long-Term Care Provider Licensing and Certification Programs

## Compliance Plan

- OSLTCO identifies previous or existing MOU efforts
- OSLTCO engages with partner agencies on a timeline for MOU development and plans for working sessions works with agencies
- OSLTCO and partner agencies draft updates and/or new MOUs
- MOUs are routed for approval and signature and take effect by October 1, 2027

# Expected Key Dates

## State Regulations

- DARS is aiming to convene a RAP in Spring 2026

## DARS/AAA Contracts

- DARS is aiming to have new contracts ready for AAA review in Spring 2027

## SUA Manual

- DARS is aiming to share the SUA Manual with the AAAs for input in Winter/Spring 2027

## AAA Policy Manual, Service Standards, and Board & Council Handbook

- DARS is aiming to share these P & Ps with the AAAs for input in Winter/Spring 2027

## Monitoring P & Ps and Tools

- DARS is aiming to share these P & Ps and Tools with the AAAs for input in Winter/Spring 2027

## LTC Ombudsman P & Ps and MOUs

- DARS is aiming to share these P & Ps with the AAAs for input in Winter/Spring 2027

- **NOTE:** DARS is planning for these activities to occur before the AAAs get underway with developing new AAA Area Plans (Year 1)

# CAP References

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- CAP Template [General Instructions](#)
- CAP [Template](#)
- October 29, 2024 CAP [Webinar](#) (Slides & Recording)



**CAP Questions or Feedback?**

# Next AAA Input Session

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- The next AAA Input Session is currently scheduled for **Sept 17, 2025 from 3:00 - 4:00 PM**
- That is also when the Southeastern Association of Area Agencies on Aging (SE4A) Conference is taking place in Savannah, GA
- Topics that DARS would intend to cover in September include:
  - 1. Area Plan Review and AAA Contracts - Updates
  - 2. Federal Funding - Updates
  - 3. State Plan on Aging Services – Status Update
  - 4. OAA Final Rule CAP – Status Update
  - 5. NCI-AD Survey – Rollout Updates
- Do you want to keep this date/time or reschedule it? **POLL**

# Wrap-Up & Reminders

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- **Reminder: AAA Annual & Emergency Preparedness Documents**
  - The recorded training and materials (including FAQ) are available on the AAA Providers' Portal [here](#)
  - **All-Hazards Risk Assessments and Emergency Preparedness Plans are due Oct 1, 2025**
  - AAA Annual Documents are due Feb 1, 2026
- Please on the lookout for feedback on your AAA's Area Plan
  - Needed changes will have a quick turnaround expectations
- 2025 AAA Input dates remaining: Oct 15, Nov 12, and Dec 17