



June 26, 2023

Administration on Aging
Administration for Community Living
Department of Health and Human Services
Attention: ACL-AA17-P
330 C Street SW, Washington, DC 20201

To Whom It May Concern:

Charlotte County in southwest Florida appreciates this opportunity to provide comments in response to the Administration for Community Living's (ACL) proposed rule relating to updates to Older Americans Act (OAA) regulations. The County supports modernizing the services provided under the OAA to support our citizens in one of the oldest counties in Florida and proposes the following changes.

Roles and Responsibilities of State Agencies and Area Agencies on Aging

The County supports clarifying the requirements of area plans and mandating Area Agencies on Aging (AAA) to better define how they will use OAA funding towards economic and social need would eliminate the grey areas of contracts. Enabling public input to carry greater weight in development of the area plans would allow services to be more focused toward the needs of each community.

We also propose setting requirements for eligibility, assessment, planning, and detailing the limitation of the frequency or type of services provided. Having guidelines and eligibility requirements will help better develop the parameters of the programs. Currently, the only eligibility requirements are for beneficiaries to be aged 60 years or older and in social or economic need, which are broad enough to enable financially well off people to utilize services. This lack of clarity could take away funding that may go towards a person who would otherwise not be able to afford private pay.

The current focus on aging sets the limits on the number of hours and services, which may do more harm than good. A person who cannot afford assisted living or nursing home may need a few extra hours to maintain aging in place. If there is a limit of service and hours, there would

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need to be a staffing procedure to allow for the circumstances that additional hours are necessary and beneficial to the individuals goal of aging in place.

Serving Older Adults, Tribal Elders, and Family Caregivers with the Greatest Economic and Social Need

The present lack of local definitions for economic and social needs hinders fair funding distribution. As each area of the state varies in their communities' needs, it would be beneficial to our community and others to create a process of enabling the local AAAs to set the standards and definitions of their respective local economic and social needs.

The ACL is also proposing that 50 percent of the area agency advisory council be 60 years and older as well as from minority populations. The County supports this condition because it is critical that the underserved populations be active and a part of determining the greatest economic and social needs, as they are a target population for OAA services.

Emergency Preparedness and Response

Finally, the proposed emergency preparedness and response plans are extremely important and need to clearly define what the expectations and requirements are before, during, and after any natural disaster. As a community recently impacted by a major hurricane, we had no guidance or expectations for post disaster response. The County was sent information via email after the storm, but due to cell tower damage and lack of service availability, we were often getting information late or not at all. Allowing flexibility of fund utilization would have greatly allowed us to better help funding beneficiaries recover and be safe in their homes rather than not being able to use any funds due to area agency workers having evacuated.

Thank you for the opportunity to comment on this important proposal and Charlotte County looks forward to continuing to work with the ACL to best serve our aging citizens.

Sincerely,



William G. Truex, Chairman
Charlotte County Board of County Commissioners