

March 21, 2024

United States Senate  
Committee on Health, Education, Labor, and Pensions  
Washington, DC 20510-6300

Dear Committee on Health, Education, Labor, and Pensions Committee Members and Chair Sanders,

Thank you for the opportunity to provide our information and perspective as the Area Agency on Aging (AAA) for Boulder County, CO on the HELP Committee's inquiry regarding the Older Americans Act. Below you will find our feedback. Please let us know if we can provide additional information.

*General Questions:*

1. What are the biggest challenges currently facing the older adult population? How have OAA programs performed historically in addressing these challenges? How can OAA programs be improved upon to better address these challenges?

The biggest challenge the Boulder County AAA faces is funding shortfalls that leave us unable to provide services to all who need them and unable to fund innovation to find new ways to support an aging population and their caregivers. Funding from the Federal and state levels do not automatically change with inflation, cost to provide service, and – most importantly – a growing older adult population. Our ability to provide and fund critical services that support aging in home and community, supporting paid and unpaid caregivers, providing nutritious meals, and providing transportation is limited without the needed growth in funds. We urge the committee to focus on funding and flexibility for current AAA programs before expanding or displacing funds into other areas of aging services.

The one-time funds receiving during COVID allowed AAAs to expand funding and innovation in-house and with our local partners, addressing the immediate needs of our older adults and caregivers while safely delivering our services. The aging network responded incredibly to those disproportionately impacted by the pandemic by building new networks of social connection, providing enriching experiences both online and in-person from a distance, providing critical financial assistance through funding flexibility, and much more.

Flexibility in funding is critical for AAAs to address highest needs in our communities. At times the capacity of our providers is limited. For example, when a local home-delivered meal provider relies heavily on donated foods, they cannot plan menus months in advance to meet the rigorous review standards mandated by the funding streams. AAAs are well-established and best suited to determine how to use our funds to serve our local communities. Our area planning processes allow us to look ahead and determine priorities to best support our areas.

2. What are your top priorities for OAA reauthorization? Please explain why.

The priorities of the OAA reauthorization are necessary and vital to the support of older adults receiving the services they need to age in place. In Boulder County this can be particularly challenging due to the high cost of living, reduced workforce health care workers,

and a lack of resource planning in the community. The OAA priorities are to fund and deliver chore and personal care services, financial assistance, transportation, and homemaker services all leading to remaining in the community and aging in place. OAA priorities are in alignment with Boulder County AAA priorities of serving more older adults to age well in home and community, to meet the needs of today and tomorrow's older adults, and to maintain efficient oversight and management of local service delivery to ensure quality.

3. The demographics of the older adult population are changing rapidly: Please describe changing needs and how the aging network (including area agencies on aging, senior centers, state units on aging, aging and disability resource centers, centers for independent living, etc.) plans to address them.

According to projections from Colorado's State Demography Office, Boulder County's total population will increase by 19% from 2021 to 2050. The largest growth of an age group in this three-decade period will be in our 80+ population, projected to increase by 246%.

Local funding flexibility and strong relationships with local partners and providers are critical to responding to changing needs. Boulder County Area Agency on Aging has a long history of collaboration across all local aging partners to support funding providers and entry points for financial resources to benefit older adults in the community. This aspect of collaboration allows us to address the changing needs of older adults as they are diverse and are not generic nor are the same from one person to the other. As our population of 80+ is the most rapidly growing group, each will not need the same services to age well in the community and therefore the continuum of services are needed to support varied needs.

4. What changes could Congress make to improve the efficiency and effectiveness of OAA services and programs?

Key priorities in the AAA network include:

- Significant increases in funding levels for services,
- Flexibility for AAAs to contract with health care entities or use other private funding to serve more older adults and caregivers,
- Flexibility in Title III C nutrition program to allow grab-and-go meals as well as broaden nutrition standards to better serve our communities regardless of size and service availability, and
- Increased funding for administration of AAA programs to support our workforce.

*Targeted Questions:*

1. Legislation passed by Congress in response to the COVID-19 pandemic made temporary changes to some OAA programs, including flexibility for nutrition services funding and adjustments to eligibility for home-delivered meals.

- a. *What impact did these changes have on older adults and program operations?*

The Boulder County Area Agency on Aging was able to serve more adults in a flexible manner and meet their needs in home due to the temporary changes during the pandemic. Being offered flexibility for nutrition services and funding expectations allowed the BCAA to contract with new providers, expand our reach in mountain communities, and increase capacities to serve older adults in the community who had not previously connected with us.

- b. *How should Congress consider these changes outside of a public health emergency?*

In order to be as efficient and effective as possible Congress much consider the

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funding needs of the AAA's on a local level. Also continuing support of flexibility of funding allowed the aging network to work more collaboratively and leverage resources to meet the needs of those we serve. Preserving local level administration of services is necessary due to the varied needs based on each community unique needs.

- c. *What changes made during the COVID-19 pandemic but not mentioned above should Congress examine for this reauthorization? d. How should Congress consider the impact of the pandemic when working to reauthorize OAA?*

BCAAA was able to immediately and creatively support changes to nutrition programs due to the flexibility afforded under the COVID-19 suspension of regulations to allow a locale congregate meal provider to offer grab and go, serving and increased number of older adults.

2. During the COVID-19 pandemic, OAA partners, including congregate meal providers, adapted to new ways of delivering services, such as providing grab and go meals.

- a. *In the absence of a public health emergency, is it appropriate to retain flexibility in meal delivery services for the congregate meals program? If so, why? What effect would changes in meal delivery services have on older Americans?*

Yes, it is appropriate to retain flexibility. Unifying and modernizing the Title III C nutrition funding streams and programs to reflect recent innovations would allow AAAs to serve the unique needs of their communities with existing providers. This will allow AAAs to explore additional partnerships with organizations who are able to meet modernized standards for these programs. We have experienced a shift in our ability to provide grab-and-go meals at one highly utilized service in our community with the end of our one-time pandemic funds.

- b. *Should Congress consider any requirements related to different ways of providing congregate meals?*

Congress should consider modernizing the way III C is administered at the state and our local AAA level, making operations simpler and increasing our local AAA's ability to provide person-centered services that still focus on good nutrition for healthy aging and reducing social isolation.

3. Congress made several changes to OAA through the Supporting Older Americans Act of 2020, including adding caregiver assessments to the National Family Caregiver Support Program as well as efforts to improve social isolation.

- a. *Have these policies better informed resources needed by caregivers or older Americans? Please explain why or why not, and if yes, how.*

It is our understanding that our III E services “may be informed through use of caregiver assessments,” though we were not federally required to an assessment or for us to use a particular type. Our services are informed using caregiver assessments that are built from the unique needs of our community, but based on what we use for older adults seeking services and caregiver assessments used by our partners. We hope to maintain our practices in this space.

- b. *How can Congress improve these efforts?*

The 2020 caregiver assessment language meets our needs, and our hope is not to create further restrictions in our caregiver services. Our AAA has what we need in this area, except for adequate funding.

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- c. *What changes made in the Supporting Older Americans Act of 2020 but not mentioned above should Congress examine for this reauthorization?*

We are in line with [USAgings Recommendation 1.2](#) which states, “Ensure that AAAs and other Aging Network community-based organizations are able to further meet their missions by securing health care or other private funding to serve more older adults.” Recently, ACL’s interpretation of the law says that the State Units on Aging need to approve an AAA’s non-OAA contracting work. The ability to explore and create these new partnerships allow AAAs to increase our funding sources, ability to provide services to older adults and caregivers, and find new flexibility and innovation in the way we provide our services.

We respectfully ask Congress to work directly with AAAs and our national association, USAgings, to avoid creating unfunded and underfunded mandates; to not divert resources away from the AAAs, especially when many AAAs do not have adequate funding to address the current needs of our communities; and to continue to focus on flexibility AAAs need to best serve our unique, local needs. Each AAA is unique - if you’ve gotten to know one AAA, you know just one AAA. We are situated in varying organizations and governments, we are geographically different, our states have different requirements, our non-Federal funding is different across the board, and – most importantly – those we serve are unique individuals with different desires around aging in home and community.

4. *ACL recently finalized regulations regarding OAA. Should Congress consider any changes in response to the new rule?*

Boulder County AAA urges Congress to clarify and rectify the conflicting and ambiguous language in multiple sections of the Act to ensure that:

- When OAA funds are leveraged to secure health care contracts or establish private-pay programs, State Units on Aging have a clear, non-burdensome and appropriate oversight process for the AAAs’ activities, and
- When OAA funds are not used in the creation of non-OAA programs or the AAA secures other revenues to meet their mission, the State Unit on Aging is only responsible for ensuring the continued oversight of the AAA’s or providers’ OAA programs. It is not appropriate for states to have any approval over a AAA or their provider’s outside-of-OAA contracting, or other endeavors intended to serve the health and aging needs of older adults, as well as caregivers.

Boulder County AAA appreciates the opportunity to provide this feedback. Please let us know if we can be of support throughout this process.

Sincerely,

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