STANISLAUS COUNTY Aging and Veterans Services Area Agency on Aging

Area Plan Update-July 1, 2023-June 30, 2024



The Area Plan for the Stanislaus County Area Agency on Aging outlines the way that the funds from the Older Americans Act will be used to provide services for older adults, adults with disabilities, and their caregivers.

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AREA PLAN UPDATE (APU) CHECKLIST PSA 30 Check one: FY21-22 FY 22-23 FY 23-24

Use for APUs only

AP Guidance Section	APU Components (To be attached to the APU)	Cheo Inclu	
	Update/Submit A) through I) <u>ANNUALLY</u> :		
n/a	A) Transmittal Letter- (requires <u>hard copy</u> with original ink signatures or official signature stamp-no photocopies)]
n/a	B) APU- (submit entire APU electronically only)	\boxtimes]
2, 3, or 4	C) Estimate- of the number of lower income minority older individuals in the PSA for the coming year	\boxtimes]
7	D) Public Hearings- that will be conducted		
n/a	E) Annual Budget		
10	F) Service Unit Plan (SUP) Objectives and LTC Ombudsman Program Outcomes		
18	G) Legal Assistance	\boxtimes	
	Update/Submit the following only if there has been a CHANGE or the section was not included in the 2020-2024	Mark Changed Changed (<u>C or N/(</u> C	Ł
5	Minimum Percentage/Adequate Proportion		\boxtimes
5	Needs Assessment		\boxtimes
9	AP Narrative Objectives:		\boxtimes
9	 System-Building and Administration 		\square
9	Title IIIB-Funded Programs		\boxtimes
9	Title IIIB-Transportation		\square
9	 Title IIIB-Funded Program Development/Coordination (PD or C) 	\boxtimes	
9	Title IIIC-1		\square
9	Title IIIC-2		\square
9	Title IIID		\square
20	 Title IIIE-Family Caregiver Support Program 		\square
9	HICAP Program		\boxtimes
12	Disaster Preparedness		\boxtimes
14	Notice of Intent-to Provide Direct Services		\boxtimes
15	Request for Approval-to Provide Direct Services		\boxtimes
16	Governing Board	\boxtimes	
17	Advisory Council	\boxtimes	
21	Organizational Chart(s)		\boxtimes

TRANSMITTAL LETTER 2020-2024 Four Year Area Plan/ Annual Update

Check <u>one</u>: **FY 20-24 FY 21-22 FY 22-23 FY 23-24**

AAA Name: Stanislaus County Aging and Veterans Services PSA 30

This Area Plan Update is hereby submitted to the California Department of Aging for approval. The Governing Board and the Advisory Council have each had the opportunity to participate in the planning process and to review and comment on the Area Plan Update. The Governing Board, Advisory Council, and Area Agency Director actively support the planning and development of community-based systems of care and will ensure compliance with the assurances set forth in this Area Plan Update. The undersigned recognize the responsibility within each community to establish systems in order to address the care needs of older individuals and their family caregivers in this planning and service area.

1. <u>Terrance</u> <u>Withrow</u>

Chairman, Stanislaus County Board of Supervisors

2. Martha Martin

Interim President, Stanislaus County Commission on Aging

5/23/23

Date

5/8/202

Date

3. Margie Palomino

Director, Aging and Veterans Services

5 8 23

Date

Area Plan Update 2023-2024

Introduction:

Post-pandemic, staff of the Stanislaus County Department of Aging and Veterans Services, along with their providers and vendors, have made a full return to in-person services. With the availability of COVID-19 vaccinations, boosters, and testing, all programs have followed the Centers for Disease Control (CDC) guidelines and local public health protocols to ensure maximum safety during this transition.

It is estimated that Stanislaus County is home to 111,386¹ citizens over the age of 60 in 2023. This figure is approximately 20% of the County's total population. It is notable that 28,889 or 26% of the age 60+ population are low income and Medi-Cal eligible. In addition, approximately 41% identify as part of a minority ethnic or racial group. An estimated 11,893 or 10% of 60+minority older adults are Medi-Cal eligible. Anecdotal evidence indicates that there are more older adults whose income is below the standard set by the Elder Index², including many who are not considered to be part of a minority group.

The Aging & Veterans Services continues to work on ways to be responsive to the needs of older adults, persons with disabilities and caregivers. Some of the highlights of 2022-23 included the return of Senior Awareness Day following the Pandemic. Partnering with the Stanislaus County Library, the Area Agency on Aging hosted an outdoor information fair, in conjunction with the Modesto Farmer's Market. The event included vendors, refreshments, and raffle prizes. A long with a plethora of information, 500 Farmer's Market Coupons were distributed, valued at \$50.00 each.

As the congregate meal sites opened up their doors to in-person dining, the Area Agency on Aging opened three new congregate meal sites as the continued direct service provider for the Senior Meals Program. Additional funding allowed new sites to be opened in the cities of Turlock, Ceres, and Modesto. All locations are thriving and working to offer meals to-go in addition to onsite meals.

¹ 2023 CDA Population Demographic Projects by County and PSA

² http://healthpolicy.ucla.edu/programs/health-disparities/elder-health/elder-index-data/Pages/Elder-Index2011.aspx

The Area Agency on Aging moves forward and continues to establish partnerships and collaborate with other agencies in the community that serve older adults. One best practice implemented was a Caregiver Wellness Retreat, a day designed for unpaid caregivers to rejuvenate, reconnect, and refocus. The Area Agency on Aging coordinated this event with 8 community partners, 22 vendors/community organizations, and 7 California State University at Stanislaus nursing students. Approximately 40 unpaid caregivers were treated to a free day of education on advanced healthcare directives, training on safe body mechanics, as well as self-care and relaxation techniques. Caregivers were served a free breakfast and lunch, earned prizes, gained resources, and received free hairstyling and manicures. Heartwarming survey responses after the event demonstrated a unanimous success.

As the Area Agency on Aging prepares for the new four-year Area Plan, we continue to work to find ways to meet extraordinary needs beyond the scope of Older American Act programs. Three new Program Development Objectives in Section 9 of this Update seek to assist rent-burdened older adults and expand the meals program for both the Congregate and Home Delivered Meals to older adults in Stanislaus County.

SECTION 7. Public Hearings

At least one public hearing must be held each year of the four-year planning cycle. CCR Title 22, Article 3, Section 7302(a)(10) and Section 7308, Older Americans Act Reauthorization Act of 2016, Section 314(c)(1).

Fiscal Year	Date	Location	Number of Attendees	Presented in languages other than English? Yes or No	Was hearing held at a Long- Term Care Facility? Yes or No
2020-2021	October 12, 2020	Virtual	18	No	No
2021-2022	March 8, 2021	Virtual	26	No	No
2022-2023	April 11, 2022	Stanislaus Veterans Center	19	No	No
2023-2024	May 8, 2023	Stanislaus Veterans Center	13	No	No

The following must be discussed at each Public Hearing conducted during the planning cycle:

1. Summarize the outreach efforts used in seeking input into the Area Plan from institutionalized, homebound, and/or disabled older individuals.

The 2023-24 Area Plan Update was sent to all the service providers, including the staff at the Long-Term Care Ombudsman Program. Additionally, one of the Commission on Aging members represents services for persons with disabilities. This helped to ensure the interests of these populations were represented for the last Area Plan Update, prior to beginning the next 4-year Area Plan.

2. Were proposed expenditures for Program Development (PD) or Coordination (C) discussed?

 \boxtimes Yes. Go to question #3.

□Not applicable, PD and/or C funds are not used. Go to question #4.

- 3. Summarize the comments received concerning proposed expenditures for PD and/or C: No comments.
- 4. Attendees were provided the opportunity to testify regarding setting minimum percentages of Title III B program funds to meet the adequate proportion of funding for Priority Services

 \Box Yes. Go to question #5

⊠No, Explain:

There were no changes in the minimum percentages between fiscal years.

- 5. Summarize the comments received concerning minimum percentages of Title IIIB funds to meet the adequate proportion of funding for priority services: No comments.
- 6. List any other issues discussed or raised at the public hearing:

There were no changes following the Public Hearing.

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SECTION 9 - Area Plan Narrative Goals and Objectives

Goal # 1

Goal: Provide Information and Assistance to Older Adults, Caregivers, and Persons with Disabilities

Rationale: Results of the Older Adult Needs Assessment Survey and Focus Groups showed that information about services and access to services for older adults is lacking.

	Projected Start and End Dates	Title IIIB Funded PD or C	Update Status
 Objective 1.1: The AAA staff will coordinate with the Stanislaus Elder Abuse Prevention Alliance (SEAPA) to conduct outreach events in various communities to increase awareness of the signs of elder abuse, how to prevent abuse, and give the resources to better serve the victims of abuse. Members of the Alliance solicit the funds needed to do these events from businesses and grants, separate from the OAA. <u>Outcome:</u> Older adults, caregivers and the general public will learn about elder abuse prevention. <u>Measurement</u>: The number of outreach events and number of attendees. Year 3 & 4: Elder Abuse Prevention information distributed through AAA Information and Assistance. 	7/1/20-6/30/24	С	No outreach events held in early FY 2021 due to staff changes and COVID. <u>FY 2022-23</u> : A SEAPA luncheon was held in-person on 11/16/22. 40 people came together to network and learn about elder abuse.
Objective 1.2: The AAA staff will work with the members of the Senior Coalition of Stanislaus County to sponsor the Healthy Aging and Fall Prevention Summit, date TBD. The AAA staff will participate in the planning and execution of the Summit, assisting with multiple aspects of the event. Free health screenings and information about fall prevention and a variety of health topics will be available to the public. The Senior Coalition does not receive OAA funds. <i>Outcome</i> : Older adults and caregivers will attend the Summit. <i>Measurement</i> : The number of attendees and health evaluations completed.	October 18-22, 2022 Next Summit October 13, 2023	С	Summit held virtually for 5 days- Oct 2022. Information sessions on the Healthy Aging website, drive- through for Info bags, 7 cities, senior housing, and HDM, MSSP clients received bags. 3,000 total bags out.

Objective 1.3: The AAA staff and Commission on Aging members will partner with the Stanislaus Senior Foundation, a non-OAA funded organization, to assist older adults whose needs cannot be met through other programs. The AAA staff will assess the needs and refer their recommendation to the Foundation members to provide the appropriate assistance. Funds for this assistance do not come from the OAA.	7/1/20-6/30/24	С	Six older adults received assistance from the Senior Foundation during the first 2 quarters of FY 2021-22.
 <u>Outcome</u>: Low-income older adults will receive assistance to remain independent and/or gain a better quality of life as long as possible. <u>Measurement</u>: The number of older adults that are referred by AAA staff to the Stanislaus Senior Foundation. Year 3 & 4: The AAA will support Senior Foundation through referrals and assessments, serving older adults most in need of assistance. 			Ten older adults received assistance from the Senior Foundation for FY 2022-23.
 Objective 1.4: The AAA staff will promote various AAA programs through outreach events, coordinating the planning for events with other County departments, community organizations, and businesses. The agencies involved in planning do not receive OAA funds. Advertisement will be to members of diverse populations, older adults of various ethnic backgrounds and LGBTQ older adults and caregivers. <u>Outcome</u>: Information about available services will be conveyed to the public via participation in outreach opportunities. <u>Measurement:</u> The number of events and the number of attendees. Year 3 & 4: LGBTQ support group newsletter emails will be sent to providers and community organizations. 	7/1/20-6/30/24	С	AAA staff email LGBTQ support group newsletters to family caregivers and other clients. AAA hosted LGBTQ Best Practices Workshop for working with LGBTQ older adults on 11/17/22.

Objective 1.5: The AAA will partner with the "Stop the Scams" committee to help develop fliers, posters, and advertisements. The committee members will market and distribute the new literature at outreach events, in publications, and at strategic offices. Advertisements will include the toll-free local Scam phone line. <u>Outcome:</u> Information about scams and how to prevent becoming a victim will be developed and distributed throughout the County. <u>Measurement:</u> The number of publications produced and distributed.	7/1/20-6/30/24		Stop the Scam posters, flyers, and scam information (approx. 100) distributed at Senior Awareness Day, 2022.
Objective 1.6: The AAA staff will create social media accounts, providing a new means for the AAA staff to interact with the wider community. The new accounts will serve to announce events and services associated with the AAA. <u>Outcome:</u> Events and services will be available to the public via social media. <u>Measurement:</u> The number of accounts established, and the number of "hits" recorded.	7/1/20-6/30/21	PD	Complete. HICAP Facebook created.
 Objective 1.7: The AAA HICAP staff will coordinate with the cities of Modesto, Oakdale, Patterson, and Turlock to hold HMO Forums during Open Enrollment for Medicare. <u>Outcome:</u> Medicare beneficiaries will learn of their choices to augment their Medicare Insurance coverage during Open Enrollment time. <u>Measurement:</u> The number of attendees at each forum. Year 3 and 4: In-person forums are back on track for October 2022 and October 2023. 	7/1/20-6/30/24		One forum resumed under hybrid model in October 2021. Forum for FY 2022-23 back to in-person. Approx 25 attendees.
Objective 1.8: The AAA will provide Caregiver Assessment as part of the Support Services for the Family Caregiver Support Program, Caring for Elderly persons.	7/1/20-6/30/24		First 2 quarters of 2022 =228 hours.

Objective 1.9: The AAA will help to develop, market and promote the "Stanislaus Home Share" pilot project facilitated through the Senior Advocacy Network. Create program flier, collect data regarding potential homeowner and renters and distribute fliers through local aging services network and program participants.	7/1/21-6/30/22	PD	Complete. The Home Share program has matched 7 home providers and 7 home
Outcome: Older adult housing seekers and homeowners will have increased awareness and opportunity for affordable rent and supplemental income respectively, through home sharing.			seekers since October 2021.
<u>Measurement</u> : Number of occurrences for collecting basic information from homeowners and renters as well as distributing fliers, informational letters, emails etc for outreach/marketing efforts.			
Objective 1.10: The AAA will coordinate with local caregiver agencies and professionals to provide a Caregiver Training for caregivers seeking assistance with their role in keeping care recipients healthy and independent at home.		0	March 2023 The AAA coordinated with 8 community partners, 22
<u>Outcome</u> : Sponsor the special training event emphasizing assistance to the caregiver. <u>Measurement:</u>	7/1/22-6/30/23	С	vendors and 7 student volunteers, to provide 40 unpaid
• Year 3 & 4: The AAA will research trainers and network with other agencies and professionals to gain interest in caregiver training.			caregivers an education, training and wellness retreat.
Objective 1.11: The AAA will provide rent subsidy payments to rent-burdened older adults over age 60 who are on a fixed or limited income.			
<i>Outcome</i> : To assist older adults who are rent-burdened due to their fixed or limited income.	7/1/23-6/30/24	PD	
<i>Measurement</i> : Number of older adults awarded subsidies.			

Goal # 2

Goal: Promote Health & Well-Being for Older Adults, Person with Disabilities, and Caregivers Rationale: The responses on the Older Adult Survey and the Focus Groups included concerns at living. Addressing these concerns and seeking ways that can help people be healthier can help of possible. Projected Update Title Start and IIIB Status **End Dates** Funded PD or C **Objective 2.1:** The AAA staff will request a resolution from In-person the Board of Supervisors to declare May to be Older award to 5 Americans Month, The AAA staff, Board of Supervisors 7/1/20-Seniors С and Commission on Aging will coordinate to honor one 6/30/24 held in May outstanding older adult from each supervisor's district at a 2021. Board of Supervisor's Meeting. Neither the Commission on Aging nor the Supervisors receive OAA funds. 2023 Award Outcome: Sponsoring the special event will emphasize the Ceremony: on-going contributions of the older adult population. May 16, 2023 <u>Measurement</u>: Participation by the public to nominate candidates to be honored and the completion of the special session of the Board of Supervisors. Year 3 and 4: The AAA will honor 5 Outstanding Seniors in May 2023 and 2024.

Objective 2.2: The AAA staff will coordinate with local senior service providers, senior housing complexes, and medical or social service staff of primary care offices or long-term care facilities to offer group presentations to promote the utilization of the older adult Prevention and Early Intervention (PEI) programs. The staff will also seek ways to participate in outreach events. The groups listed above do not receive OAA funds.Outcome: PEI programs.Measurement: PEI programs.Measurement: PEI programs.Measurement: PEI programs.Measurement: PEI programs.Measurement: PEI programs.Measurement: PEI programs.Measurement: PEI programs.AAA staff will provide a minimum of 12 presentations and attend 6 outreach events annually.	7/1/20- 6/30/24	С	FY2022-23: PEI did outreach to the Older Adult Collaborative in addition to Senior Awareness Day, Age of Movement, Caregiver Retreat, HICAP Forum,
Year 3 & 4: AAA staff will work to record trainings and presentations that can be disseminated to service providers for access anytime.			totalling over 15 presentations.
Objective 2.3: The AAA staff will coordinate with members of the Senior Coalition of Stanislaus County to understand and access available services. Coordination will involve providing referrals to various organizations seeking to avoid duplication of services. This will result from understanding the various services available from organizations that do not receive OAA funds.Outcome: Members of the Coalition will coordinate to provide accurate information and services for older adults and caregivers in Stanislaus County. Measurement: The variety of service providers in the Coalition and the number of events/services available to older adults and caregivers.• Year 3 & 4: Continue participating in Senior Coalition.	7/1/20- 6/30/24	С	AAA increased service providers to the Coalition, strong coordination for AAA Caregiver Retreat and collaboration with Master Plan for Aging.

 Objective 2.4: The AAA staff will coordinate with the Commission on Aging (COA) Housing Subcommittee to help promote increased affordable housing and new innovative housing options for older adults as a homelessness prevention intervention. Coordination will involve investigating potential options and assessing the needs of older adults. The Commission on Aging does not receive OAA funds. <u>Outcome:</u> Older adults will have access to affordable housing Information. <u>Measurement:</u> Housing lists of "rooms for rent" and "room and board" facilities will be developed and distributed by the AAA. Year 3 & 4: Senior Information Line staff will record the number of seniors interested in a shared housing /home match program as well homeowners interested in renting a room as part of the program. 	7/1/22- 6/30/24	С	AAA and COA helped promote new Home Share program. Senior Info Line continues to process referrals and track housing calls.
 Objective 2.5: The AAA staff will participate in the Stanislaus Community System of Care (StanCSOC), a 25-member council representing all major sectors of our community, which was established to lead efforts to prevent homelessness. The AAA staff will help to manage services with CSOC organizations including County departments, housing providers and community organizers. None of the other partners receive OAA funds. <u>Outcome:</u> Older adults will move from homelessness to transitional housing to permanent housing, aided by AAA staff. <u>Measurement:</u> The number of older adults aided by the partners. Year 3 & 4: Staff will participate in monthly meetings. 	7/1/20- 6/30/24	С	AAA staff collaborated with StanCSOC members to make effective housing referrals to AAA Senior Advocacy Network housing programs.

Objective 2.6: The AAA staff will work to expand the services available through the Family Caregiver Support Program, Caregiver Caring for Elderly, and the Multipurpose Senior Services Program to include additional services such as chore and home adaptation services. These services will provide opportunities for caregivers to more effectively care for their loved ones. The AAA staff will pursue agencies to contract with the AAA for these services.	7/1/21- 6/30/22	PD	Complete. 893 hours of respite services and 15 assistive devices
<u>Outcome</u> : Caregivers and older adults will have services that will continue to allow them to live in the community.			
<i>Measurement</i> : The increased number of clients and services.			
Objective 2.7: The AAA will provide In-Home Supervision, Homemaker Assistance, In-Home Personal Care, Out-of-Home Overnight Care and Assistive Devices as part of the Respite Care and Supplemental Services available for the Family Caregiver Support Program, Caring for Elderly persons. <u>Outcome:</u> Caregivers will receive more efficient and timely respite services.	7/1/22 - 6/30/24	PD	Complete. As a direct service provider, the AAA utilized the services of nursing
Measurement: Increased number of clients and services.			students and social
• Year 3 & 4: The AAA will utilize nursing student interns to enhance and increase service by conducting assessments and other needs.			worker interns.
Objective 2.8: The AAA will work to expand the Senior Meals Program by creating 3 new Congregate Meal Sites in Modesto, Ceres, and Turlock (Ceres Community Center, Stanislaus Veterans Center, and Turlock Senior Center).	7/1/22- 6/30/24	PD	Complete. Three new sites were opened in Ceres,
<u>Outcome:</u> Increase the number of older adults receiving meals throughout Stanislaus County.			Modesto, & Turlock.
<i>Measurement</i> : Number of new participants.			
Objective 2.9: The AAA will expand the Home Delivered Meals program by increasing the number of meals. They will move from 5 meal frozen boxes to 7 meal frozen boxes per week.Outcome: Outcome: Increase the number of meals being served to homebound older adults in Stanislaus County.Measurement: Number of new meals.	7/1/22- 6/30/24	PD	Complete. The AAA now serves 7 meals per week, increasing meals over 2,500/mo.

Objective 2.10: The AAA will expand the Home Delivered Meals program by increasing the number of meals. They will add a monthly breakfast box. <i>Outcome</i> : Increase the number of breakfast meals provided. <i>Measurement</i> : Number of new meals.	7/1/23- 6/30/24	PD	
 Objective 2.11: The AAA will open at least one new congregate meal site targeting low-income housing areas. <i>Outcome</i>: Increase the number of meals in low-income areas. <i>Measurement</i>: Number of new meals. 	7/1/23- 6/30/24	PD	
Objective 2.12: The AAA will expand the Senior Meals Program by offering the option of meals-to-go from some congregate meal sites. <i>Outcome</i> : Increase the number of fresh meals. <i>Measurement</i> : Number of new meals.	7/1/23- 6/30/24	PD	

SECTION 10 – Service Unit Plan (SUP) Objectives

TITLE III/VIIA SERVICE UNIT PLAN OBJECTIVES (CCR Article 3, Section 7300(d)

The Service Unit Plan (SUP) uses the Older Americans Act Performance System (OAAPS) Categories and units of service. They are defined in the <u>OAAPS State</u> Program Report (SPR)

For services <u>not</u> defined in OAAPS, refer to the <u>Service Categories and Data</u> <u>Dictionary</u>.

 Report the units of service to be provided with <u>ALL regular AP funding</u> <u>sources</u>. Related funding is reported in the annual Area Plan Budget (CDA 122) for Titles IIIB, IIIC-1, IIIC-2, IIID, and VII. Only report services provided; others may be deleted.

Homemaker (In-Home) Unit of Service = 1 hour

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers (if applicable)
2020-2021	5,200	2	
2021-2022	4,700	2	
2022-2023	4,700	2	
2023-2024	4,700	2	

Home-Delivered Meal Unit of Service = 1 meal

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers (if applicable)
2020-2021	125,000	2	
2021-2022	125,000	2	
2022-2023	125,500	2	
2023-2024	125,000	2	

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers (if applicable)
2020-2021	300	2	
2021-2022	400	2	
2022-2023	400	2	
2023-2024	400	2	

Case Management (Access)Unit of Service = 1 hour

Congregate Meals Unit of Service = 1 meal

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers (if applicable)
2020-2021	63,000	2	
2021-2022	63,000	2	
2022-2023	72,000	2	
2023-2024	63,000	2	

Legal Assistance Unit of Service = 1 hour

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers (if applicable)
2020-2021	1,600	1	
2021-2022	1,600	1	
2022-2023	1,600	1	
2023-2024	1,600	1	

Nutrition Education Unit of Service = 1 session per participant

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers (if applicable)
2020-2021	2,500	1	
2021-2022	2,500	1	
2022-2023	2,500	1	
2023-2024	2,500	1	

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers (if applicable)
2020-2021	3,000	1, 2	1.3, 1.4, 2.1
2021-2022	3,000	1, 2	1.3, 1.4, 2.1
2022-2023	4,000	1, 2	1.3, 1.4, 2.1
2023-2024	4,000	1,2	1.3, 1.4, 2.1

Information and Assistance (Access) Unit of Service = 1 contact

Outreach (Access) Unit of Service = 1 contact

·			
Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers (if applicable)
2020-2021	600	1, 2	1.1, 1.2, 1.3, 1.4, 2.2
2021-2022	600	1, 2	1.1, 1.2, 1.3, 1.4, 2.2
2022-2023	600	1, 2	1.1, 1.2, 1.3, 1.4, 2.2
2023-2024	600	1, 2	1.1, 1.2, 1.3, 1.4, 2.2

Other Supportive Service Category: Cash/Material Aid, Unit of Service: 1 Instance

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers
2020-2021	15	1	
2021-2022	25	1	
2022-2023	30	1	
2023-2024	30	1	

Title IIID/ Health Promotion-Evidence Based

Unit of Service = 1 contact

Evidence-Based Program Name(s): <u>A Matter of Balance Classes</u>

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers
2020-2021	96	2	
2021-2022	50	2	
2022-2023	50	2	
2023-2024	50	2	

Unit of Service = 1 contact

Evidence-Based Program Name(s): Tai Chi, for Arthritis and Fall Prevention

Fiscal Year	Proposed Units of Service	Goal Numbers	Objective Numbers
2020-2021	100	2	
2021-2022	76	2	
2022-2023	76	2	
2023-2024	76	2	

TITLE IIIB and Title VIIA: Long-Term Care Ombudsman Program Outcomes

2020-2024 Four-Year Planning Cycle

As mandated by the Older Americans Act Reauthorization Act of 2020, the mission of the LTC Ombudsman Program is to seek resolution of problems and advocate for the rights of residents of LTC facilities with the goal of ensuring their dignity, quality of life, and quality of care.

Each year during the four-year cycle, analysts from the Office of the State Long-Term Care Ombudsman (OSLTCO) will forward baseline numbers to the AAA from the prior fiscal year National Ombudsman Reporting System (NORS) data as entered into the Statewide Ombudsman Program database by the local LTC Ombudsman Program and reported by the OSTLCO in the State Annual Report to the Administration on Aging (AoA).

The AAA will establish targets each year in consultation with the local LTC Ombudsman Program Coordinator. Use the yearly baseline data as the benchmark for determining yearly targets. Refer to your local LTC Ombudsman Program's last three years of AoA data for historical trends. Targets should be reasonable and attainable based on current program resources.

Outcome 1. The problems and concerns of long-term care residents are solved through complaint resolution and other services of the Ombudsman Program. Older Americans Act Reauthorization Act of 2020, Section 712(a)(3), (5)]

Measures and Targets:

A. Complaint Resolution Rate (NORS Element CD-08) (Complaint

Disposition). The average California complaint resolution rate for FY 2017-2018 was 73%.

1. FY 2018-2019 Baseline Resolution Rate:

Number of complaints resolved <u>200</u> + number of partially resolved complaints <u>94</u> divided by the total number of complaints received <u>516</u>= Baseline Resolution Rate <u>57</u>% FY 2020-2021 Target Resolution Rate 65%

2. FY 2019-2020 Baseline Resolution Rate:	
Number of complaints partially or fully resolved <u>174</u> divided by the total	
number	
of complaints received <u>330</u> = Baseline Resolution Rate 53 %	
FY 2021-2022 Target Resolution Rate65%	

 FY 2020 - 2021 Baseline Resolution Rate: Number of complaints partially or fully resolved <u>210</u>______divided by the total number of complaints received <u>291</u>___= Baseline Resolution Rate_<u>72</u>% FY 2022-2023 Target Resolution Rate_65_%

4. FY 2021-2022 Baseline Resolution Rate: Number of complaints partially or fully resolved <u>203</u> divided by the total number of complaints received <u>256</u>= Baseline Resolution Rate <u>79</u>% FY 2023-2024 Target Resolution Rate <u>65%</u>

Program Goals and Objective Numbers: 2

B. Work with Resident Councils (NORS Elements S-64 and S-65)

- 1. FY 2018-2019 Baseline: Number of Resident Council meetings attended 39
- 2. FY 2020-2021 Target: 45
- 2. FY 2019-2020 Baseline: Number of Resident Council meetings attended <u>15</u> FY 2021-2022 Target: 20
- 3. FY 2020-2021 Baseline: Number of Resident Council meetings attended <u>20</u> FY 2022-2023 Target: <u>40</u>
- 4. FY 2021-2022 Baseline: Number of Resident Council meetings attended <u>37</u> FY 2023-2024 Target: <u>30</u>

Program Goals and Objective Numbers: 1

C. Work with Family Councils (NORS Elements S-66 and S-67)

- 1. FY 2018-2019 Baseline: Number of Family Council meetings attended 0
- 2. FY 2020-2021 Target: 2
- 2. FY 2019-2020 Baseline: Number of Family Council meetings attended <u>0</u> FY 2021-2022 Target: 2
- 3. FY 2020-2021 Baseline: Number of Family Council meetings attended <u>0</u> FY 2022-2023 Target: <u>2</u>
- 3. FY 2021-2022 Baseline: Number of Family Council meetings attended 0_____
- 4. FY 2023-2024 Target: <u>2</u>

Program Goals and Objective Numbers: 1

- **D. Information and Assistance to Facility Staff** (NORS Elements S-53 and S-54) Count of instances of Ombudsman representatives' interactions with facility staff for the purpose of providing general information and assistance unrelated to a complaint. Information and Assistance may be accomplished by telephone, letter, email, fax, or in-person.
- 1. FY 2018-2019 Baseline: Number of Instances <u>174</u>
- 2. FY 2020-2021 Target: 200

- FY 2019-2020 Baseline: Number of Instances<u>184</u> FY 2021-2022 Target: <u>200</u>
 FY 2020-2021 Baseline: Number of Instances<u>435</u> FY 2022-2023 Target: <u>250</u>
 FY 2021-2022 Baseline: Number of Instances <u>209</u> FY 2023-2024 Target: <u>250</u>
 Program Goals and Objective Numbers: <u>1</u>
- **E.** Information and Assistance to Individuals (NORS Element S-55) Count of instances of Ombudsman representatives' interactions with residents, family members, friends, and others in the community for the purpose of providing general information and assistance unrelated to a complaint. Information and Assistance may be accomplished by telephone, letter, email, fax, or in person.
 - 1. FY 2018-2019 Baseline: Number of Instances 425 FY 2020-2021 Target: 500
 - 2. FY 2019-2020 Baseline: Number of Instances<u>354</u> FY 2021-2022 Target: 360
 - 3. FY 2020-2021 Baseline: Number of Instances<u>671</u> FY 2022-2023 Target: <u>500</u>
 - 4. FY 2021-2022 Baseline: Number of Instances <u>749</u> FY 2023-2024 Target: <u>500</u>

Program Goals and Objective Numbers: 1

- F. Community Education (NORS Element S-68) LTC Ombudsman Program participation in public events planned to provide information or instruction to community members about the LTC Ombudsman Program or LTC issues. The number of sessions refers to the number of events, not the number of participants. This cannot include sessions that are counted as Public Education Sessions under the Elder Abuse Prevention Program.
 - FY 2018-2019 Baseline: Number of Sessions 9
 FY 2020-2021 Target: 10
 FY 2019-2020 Baseline: Number of Sessions 2
 FY 2021-2022 Target: 2
 FY 2020-2021 Baseline: Number of Sessions 3
 FY 2022-2023 Target: <u>5</u>
 FY 2021-2022 Baseline: Number of Sessions 1
 FY 2023-2024 Target: <u>4</u>
 Program Goals and Objective Numbers: <u>1</u>

G. Systems Advocacy (NORS Elements S-07, S-07.1)

FY 2020-2021

The Ombudsman Program will work with Long Term Care facilities to help with improving the quality of care for residents through existing resident council meetings. The Ombudsman program will educate both residents and administration of the benefits of having a strong resident council that can help with addressing facility concerns, resolving differences, and developing suggestions that improve facility wide services. The resident council could make community connections that are relevant to long term facilities.

Some examples of educational topics to be presented to residents will be the right to selfdetermination and to be treated with dignity and respect. The Ombudsman Program will provide residents with additional important resident rights information such as, the right to participate in facility surveys and the right to form and hold regular meetings.

The Ombudsman Program will determine what facilities have an existing resident council, then work with resident participants on how the Ombudsman program can assist with enhancing their resident council. For those facilities that do not have a resident council, the Ombudsman program will work with the facility administration to identify residents that the Ombudsman can speak to about establishing a resident council.

By residents joining with other residents, they will be able to support new residents and speak up for those that cannot. In turn, residents will be able to participate in creating an environment that is best for their care and quality of life.

FY 2021-2022

Outcome of FY 2020-2021 Efforts:

In 2021 since restrictions have eased, the Ombudsmen representatives are now able to enter facilities and have begun identifying facilities with or without resident councils.

The Ombudsman Program has created a brochure "Resident Councils – Information on Resident Councils for Residents Living at Skilled Nursing Facilities" that includes resident council rights, tips and best practices. At Residential Care Facilities for the Elderly (RCFE) the Ombudsmen are working with administrators to initiate resident council. The Ombudsman Program has purchased "2020 RCFE Laws and Regulations Easy Reference Guide" to assist resident council members.

FY 2021-2022 Systems Advocacy Effort(s): (Provide one or more new systems advocacy efforts) For both types of facilities (SNF) and (RCFE) if there is no active resident council, the Ombudsmen will support interested residents by providing information and ideas on how to structure a resident council and assist with challenges. While providing either direct resident support or through a resident council, the Ombudsman Program will provide educational material regarding Scams, LGBTQ+ workshops, residents' visitation rights and LGBT Long-Term Care Facilities Resident Bill of Rights.

FY 2022-2023

Outcome of FY 2021-2022 Efforts:

In 2021, the Ombudsman program was challenged by the new variants of the Coronavirus. It was necessary for facilities to continue restrictions according to state and local public health guidelines. This made working with the resident and family councils unpredictable. In addition, staff shortages at facilities, coupled with a shortage of Ombudsman volunteers willing to enter facilities, made progress slow for advocating resident and family councils. In the past few months, the Ombudsman Program and staff have been able to identify several active resident councils and when possible, will be participating more as COVID-19 restrictions are lifted.

FY 2022-2023 Systems Advocacy Effort(s): (Provide one or more new systems advocacy efforts)

Due to the ongoing pandemic restrictions and health concerns, the Stanislaus Ombudsman Program has suffered a loss of approximately 9 volunteers, bringing their count from 18 down to 9. Because the success of the program depends on volunteers, the Stanislaus Ombudsman Program will be working to recruit new volunteers. They will work to advertise the need through the AAA, Serving Our Seniors Network, local churches, and other collaborative agencies. In addition, the Stanislaus Ombudsman will actively relay the need during public education sessions in the community. A new flyer has been made to be distributed accordingly. The goal is to conduct at least 2 training sessions for new volunteers.

FY 2023-24 Outcome of FY 2022-23 Efforts:

In 2022, the Ombudsman Program has been able to identify facilities with resident councils and have started conversations with facilities that do not have resident councils about the advantages of having one. The Ombudsman staff are attending meetings more frequently especially with the reduction of Covid-19 and restrictions related to Covid. The Ombudsman staff provide informational material about the Ombudsman program, residents rights, and other material they may inquire about, such as Scams. The Ombudsman has more opportunities to advocate for all residents when asked by resident councils to address concerns. The results seem to be more productive and successful this way.

FY 2023-24 Systems Advocacy Effort(s):

The Ombudsman program will continue to work on assisting with establishing resident council councils. The Ombudsman's program goal for this upcoming year will be to educate new volunteer(s). New volunteers will be trained on resident councils and how they can assist residents by establishing and maintaining councils. Part of the training is to encourage the resident councils to have family councils. The Ombudsman Program goal will be to have at least two or more family councils take place this fiscal year.

Outcome 2. Residents have regular access to an Ombudsman. [(Older Americans Act Reauthorization Act of 2016), Section 712(a)(3)(D), (5)(B)(ii)] <u>Measures and Targets</u>:

A. Routine Access: Nursing Facilities (NORS Element S-58) Number of nursing facilities within the PSA that were visited by an Ombudsman representative at least once each quarter **not** in response to a complaint. NOTE: This is not a count of *visits* but a count of *facilities*. In determining the number of facilities visited for this measure, no nursing facility can be counted more than once.

 FY 2018-2019 Baseline: Number of Nursing Facilities visited at least once a quarter not in response to a complaint_18
 FY 2019-2020 Baseline: Number of Nursing Facilities visited at least once a quarter not in response to a complaint_0
 FY 2020-2021 Baseline: Number of Nursing Facilities visited at least once a quarter not in response to a complaint <u>8</u> FY 2022-2023 Target: <u>19</u> (Number of NFs visited 8 divided by the number of NFs 19 = 42%)
 FY 2021-2022 Baseline: Number of Nursing Facilities visited at least once a quarter not in response to a complaint: <u>18</u> FY 2023-2024 Target: <u>19</u>
Program Goals and Objective Numbers:

B. Routine access: Residential Care Communities (NORS Element S-61) Number of RCFEs within the PSA that were visited by an Ombudsman representative at least once each quarter during the fiscal year **not** in response to a complaint. NOTE: This is not a count of *visits* but a count of *facilities*. In determining the number of facilities visited for this measure, no RCFE can be counted more than once.

1. FY 2018-2019 Baseline: Number of RCFEs visited at least once a quarter not in response to a complaint <u>73</u>

FY 2020-2021 Target: 70

2. FY 2019-2020 Baseline: Number of RCFEs visited at least once a quarter not in response to a complaint: <u>0</u>

FY 2021-2022 Target: 71

- 3. FY 2020-2021 Baseline: Number of RCFEs visited at least once a quarter not in response to a complaint <u>72</u>
 FY 2022-2023 Target:93

 (Number of RCFEs visited 72 divided by the number of RCFEs 93= 77%)
- 4. FY 2021-2022 Baseline: Number of RCFEs visited at least once a quarter not in response to a complaint <u>81</u>

FY 2023-2024 Target: 85

Program Goals and Objective Numbers: _____

C. Number of Full-Time Equivalent (FTE) Staff (NORS Element S-23) This number may only include staff time legitimately charged to the LTC Ombudsman Program. Time spent working for or in other programs may not be included in this number. For example, in a local LTC Ombudsman Program that considers full-time employment to be 40 hour per week, the FTE for a staff member who works in the Ombudsman Program 20 hours a week should be 0.5, even if the staff member works an additional 20 hours in another program.

1. FY 2018-2019 Baseline:2.98 FTEs FY 2020-2021 Target: <u>3.5</u> FTEs	
2. FY 2019-2020 Baseline: <u>2</u> FTEs FY 2021-2022 Target: 3.5_FTEs	
3. FY 2020-2021 Baseline: <u>5.46</u> FTEs FY 2022-2023 Target: <u>4.25</u> FTEs	
4. FY 2021-2022 Baseline: 4.36FTEs FY 2023-2024 Target: <u>3.75</u> FTEs	
Program Goals and Objective Numbers: <u>2</u>	

D. Number of Certified LTC Ombudsman Volunteers (NORS Element S-24)

- 1. FY 2018-2019 Baseline: Number of certified LTC Ombudsman volunteers 18
- 2. FY 2020-2021 Projected Number of certified LTC Ombudsman volunteers 10
- 2. FY 2019-2020 Baseline: Number of certified LTC Ombudsman volunteers <u>15</u> FY 2021-2022 Projected Number of certified LTC Ombudsman volunteers <u>15</u>
- 3. FY 2020-2021 Baseline: Number of certified LTC Ombudsman volunteers <u>11</u> FY 2022-2023 Projected Number of certified LTC Ombudsman volunteers <u>16</u>
- 3. FY 2021-2022 Baseline: Number of certified LTC Ombudsman volunteers 7
- 4. FY 2023-2024 Projected Number of certified LTC Ombudsman volunteers 10

Program Goals and Objective Numbers: 2

Outcome 3. Ombudsman representatives accurately and consistently report data about their complaints and other program activities in a timely manner. [Older Americans Act Reauthorization Act of 2016, Section 712(c)]

Measures and Targets:

In the box below, in narrative format, describe one or more specific efforts your program will undertake in the upcoming year to increase the accuracy, consistency, and timeliness of your National Ombudsman Reporting System (NORS) data reporting.

2021-2022: The Ombudsman Program has hired additional staff to assist in monitoring the NORS data for accuracy and consistency. The staff person will also follow up with Ombudsmen as needed, to assist in ensuring that the data is being entered in a timely manner.

2022-2023: The Stanislaus Ombudsman Program purchased 2 new laptops to assist with entering data more rapidly at satellite locations or more immediately after leaving facilities.

2023-2024: The Stanislaus Ombudsman had more opportunities to attend events. During these events, Ombudsman staff educated the community about the Ombudsman program and volunteer opportunities. The information collected about the individuals interested was added to an "Ombudsman potential list". This new list along with the previous list is used to contact interested individuals by phone or email. Several individuals are now interested and would like to attend a training.

Social media has been a more recent and effective way of advertising and promoting the program. This includes the Catholic Charities Facebook page and the Stanislaus Veterans Center. The Veterans Center has advertised Ombudsman Training opportunities using the advertisement monitor located in the lobby. They have also agreed to advertise as needed and suggested that the Ombudsman Program do a presentation to veterans. We also received permission to display the "Ombudsman" and "Volunteers needed" pamphlets on their wall-mounted holder.

TITLE VIIA Elder Abuse Prevention Program

The program conducting the Title VIIIA Elder Abuse Prevention work is:

	Ombudsman Program
<u>X</u>	
	Legal Services Provider
	Adult Protective Services
	Other (explain/list)

The agency receiving Title VIIA Elder Abuse Prevention funding is: Catholic Charities

Fiscal Year	Total # of Public Education Sessions	
2020-2021	4	
2021-2022	2	
2022-2023	6	
2023-2024	4	

Fiscal Year	Total # of Training Sessions for Caregivers served by Title IIIE
2020-2021	0
2021-2022	0
2022-2023	1
2023-2024	1

Fiscal Year	Total # of Training Sessions for Professionals
2020-2021	6
2021-2022	3
2022-2023	6
2023-2024	4

Fiscal Year	Total # of Hours Spent Developing a Coordinated System
2020-2021	48
2021-2022	24
2022-2023	30
2023-2024	25

Fiscal Year	Total # of Copies of Educational Materials to be Distributed	Description of Educational Materials
2020-2021	3000	Elder abuse awareness brochures and flyers, scam alert flyers, reporting elder abuse
2021-2022	3200	Elder abuse awareness brochures and flyers, scam alert flyers, reporting elder abuse
2022-2023	800	Elder abuse awareness brochures, flyers, posters, red flags of abuse flyers, types of scam flyers, reporting elder abuse, and mandated reporting educational material.
2023-2024	800	Elder abuse awareness brochures, flyers, posters, red flags of abuse flyers, types of scam flyers, reporting elder abuse, and mandated reporting educational material.

Fiscal Year	Total Number of Individuals Served
2020-2021	1300
2021-2022	900
2022-2023	1000
2023-2024	1000

TITLE IIIE Service Unit Plan Objectives

This Service Unit Plan (SUP) uses the five broad federally mandated service categories. Refer to the CDA Service Categories and Data Dictionary Revisions Effective July 2018 for eligible activities and service unit measures. Specify proposed audience size or units of service for ALL budgeted funds

CATEGORIES	1	2	3	
Services for Caregivers of Older Adults	<i>Proposed</i> Units of Service	<i>Required</i> Goal #(s)	<i>Optional</i> Objective #(s)	
Information Services	# of activities and Total est. audience for above			
2020-2021	# of activities: 35 Total est. audience for above: 10,300	1		
2021-2022	# of activities:35 Total est. audience for above: 10,300	1		
2022-2023	# of activities:35 Total est. audience for above: 10,300	1		
2023-2024	# of activities:35 Total est. audience for above: 10,300	1		
Access Assistance	Total contacts			
2020-2021	900	1		
2021-2022	900	1		
2022-2023	900	1		
2023-2024	900	1		
Support Services	Total hours			
2020-2021	275	1		
2021-2022	275	1		
2022-2023	275	1		
2023-2024	275	1		

Direct and/or Contracted IIIE Services

Respite Care	Total having		
	Total hours		
2020-2021	3,000	2	
2021-2022	2,800	2	
2022-2023	2,800	2	
2023-2024	2,800	2	
Supplemental Services	Total occurrences		
2020-2021	75	2	
2021-2022	75	2	
2022-2023	75	2	
2023-2024	75	2	

Health Insurance Counseling and Advocacy Program (HICAP) Service Unit Plan

CCR Article 3, Section 7300(d)

STATE & FEDERAL PERFORMANCE TARGETS: The Administration for Community Living (ACL) establishes targets for the State Health Insurance Assistance Program (SHIP)/HICAP performance measures (PMs). ACL introduced the current SHIP PMs in late 2016 and continues to manage the PMs in conjunction with the SHIP Annual Resource Report, used to inform Congress. The SHIP PMs are comprised of five (5) base elements, with one multi-layered category. The PMs are not used in performance-based funding scoring methodology, but instead are assessed to determine a Likert scale comparison model for setting National PM Targets that define the proportional penetration rates needed for statewide improvements.

Using ACL's approach, CDA HICAP calculates State and Federal Performance Measures with goal-oriented targets for each AAA's Planning and Service Area (PSA). The PMs are calculated at the county-level data, then displayed under each Planning Service Area. In general, the State and Federal Performance Measures include the following:

- PM 1.1 Clients Counseled ~ Number of finalized Intakes for clients/ beneficiaries that received HICAP services
- PM 1.2 Public and Media Events (PAM) ~ Number of completed PAM forms categorized as "interactive" events
- PM 2.1 Client Contacts ~ Percentage of one-on-one interactions with any Medicare beneficiaries
- PM 2.2 PAM Outreach Contacts ~ Percentage of persons reached through events categorized as "interactive"
- PM 2.3 Medicare Beneficiaries Under 65 ~ Percentage of one-on-one interactions with Medicare beneficiaries under the age of 65
- PM 2.4 Hard-to-Reach Contacts ~ Percentage of one-on-one interactions with "hard-to- reach" Medicare beneficiaries designated as:
 - PM 2.4a Low-income (LIS)
 - o PM 2.4b Rural
 - PM 2.4c English Second Language (ESL)
- PM 2.5 Enrollment Contacts ~ Percentage of contacts with one or more qualifying enrollment topics discussed

AAA's should demonstrate progress toward meeting or improving on the Performance requirements established by CDA and ACL as is displayed annually on the *HICAP State and Federal Performance Measures* tool located online at: https://www.aging.ca.gov/Providers and Partners/Area Agencies on Aging/ Planning/

(Reference CDA PM 17-11 for further discussion, including current HICAP Performance Measures and Definitions).

For current and future planning, CDA requires each AAA ensure that HICAP service units and related federal *Annual Resource Report* data are documented and verified complete/ finalized in CDA's Statewide HICAP Automated Reporting Program (SHARP) system per the existing contractual reporting requirements. HICAP Service Units do not need to be input in the Area Plan (with the exception of HICAP Paid Legal Services, where applicable).

GOVERNING BOARD MEMBERSHIP

2020-2024 Four-Year Area Plan Cycle

<u>5</u>

Total Number of Board Members:

Name and T	itle of	Officers:
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Expires:

Channce Condit, Chairman Mani Grewal, Vice-Chairman

Names and Titles of All Members:

Expires:

Expires:	
Buck Condit	1/1/2025
Vito Chiesa	1/1/2025
Terrance Withrow	1/1/2023

Explain any expiring terms - have they been replaced, renewed, or other?

They are all currently still serving.

Office Term

1/1/2025

1/1/2023

Board Term
ADVISORY COUNCIL MEMBERSHIP

2020-2024 Four-Year Planning Cycle

Total Council Membership (include vacancies) 18

Number of Council Members over age 60 <u>16</u>

	% Of PSA's	% on
	60+Population	Advisory Council
Race/Ethnic Composition		
White	<u>59%</u>	<u>58%</u>
Hispanic	<u>27%</u>	<u>21%</u>
Black	<u>3%</u>	<u>12%</u>
Asian/Pacific Islander	<u>_7%</u>	0
Native American/Alaskan Native	<u>1%</u>	0
Other	3%	<u>0</u>

Name and Title of Officers:

Expires:

Office Term

Vacancy, President	
Martha Martin, 1 st Vice President	6/30/2024
Joyce Gandelman, 2 nd Vice President	6/30/2025

Name and Title of other members:

Office Term

Expires:	
Lupe Aguilera	6/30/2023
Eileene King	6/30/2023
Sebastian Jones	6/30/2023
Jenny Kenoyer	6/30/2024
Richard Navarro	6/30/2024
Billie Taylor	6/30/2024
Ken Hanigan	6/30/2024
Steven Fimbrez	6/30/2023
Rachell LeViege	6/30/2023
Dianna Olsen	6/30/2023

John R. Dinan	6/30/2025
Jeri Johnson	6/30/2025
Hayley Vieyra	6/30/2026
Marye Martinez	6/30/2024
Teresa Jenna	6/30/2023
RoseLee Hurst	6/30/2025
Ben Reuben	6/30/2024

Indicate which member(s) represent each of the "Other Representation" categories listed below.

Yes No

- X 🗆 Low Income Representative
- X Disabled Representative

- X 🗆 Health Care Provider Representative
- X 🗆 Local Elected Officials:

Explain any "No" answer(s): _

Explain any expiring terms – have they been replaced, renewed, or other? Briefly describe the local governing board's process to appoint Advisory Council members:

Each supervisor appoints two members from his or her district, equaling ten in total. The supervisor may identify a potential candidate, or a candidate may be recommended as a person interested in serving on the Commission on Aging. That person is interviewed by the supervisor or the representative of the supervisor and is subsequently chosen to represent the older adults, persons with disabilities, and caregivers of that district. The AAA staff and Commission on Aging leadership are notified of the appointment and the person is admitted as a voting member of the Commission. The remaining members are designated as members-at-large by the Commission on Aging Membership Committee.

SECTION 18 – Legal Assistance

2020-2024 Four-Year Area Planning Cycle

This section <u>must</u> be completed and submitted annually. The Older Americans Act Reauthorization Act of 2020 designates legal assistance as a priority service under Title III B [42 USC §3026(a)(2)] CDA developed *California Statewide Guidelines for Legal Assistance* (Guidelines), which are to be used as best practices by CDA, AAAs and LSPs in the contracting and monitoring processes for legal services, and located at: <u>https://aging.ca.gov/Providers_and_Partners/Legal_Services/#pp-gg</u>

1. Based on your local needs assessment, what percentage of Title IIIB funding is allocated to Legal Services? **Discuss**:

The Senior Law Project is allocated 22.02% of Title IIIB funding.

2. Specific to Legal Services, has there been a change in your local needs in the past four years? If so, please identify the change (include whether the change affected the level of funding and the difference in funding levels in the past four years). Yes/No, Discuss:

As reported in our last annual update, the need for new and different housing legal services continues to grow in our region. While the homebuyer housing market seems to have cooled off, the rental market continues to grow more and more competitive. Our clients, typically low-income seniors, continue to face evictions, rent increases and illegal discrimination practices. We are not different from the rest of California in this regard. The number of seniors reaching out for housing legal and support services has increased exponentially in the last two years because they are at-risk of or experiencing homelessness, often for the first time in their lives. Our legal services are supporting with eviction defense, landlord/tenant issues, fair housing, discrimination, reasonable accommodation and more.

We have also seen an increase in older adults becoming victims of scams, especially romance and grandparent scams. The COVID epidemic increased the amount of isolation experienced by many older adults. They did not see their families as often and relied more on their telephones and internet for communication and friendships, thus making them more vulnerable to internet and telephone scams. While we have been able to assist with stopping some of these scams with local banks and local predators, we are neither experienced in or have the financial resources to try to recover stolen assets from out of state and out of country scammers. This is a low priority for law enforcement agencies or the District Attorney. We have reached out to the Attorney General and FBI who are very interested in the foreign scams but to our knowledge have not helped any of our older adults who have been targeted.

While scams have not had a specific effect on our level of funding, the lack of funds to assist with scams precludes us from providing any other services besides counseling and advice, preparation of Elder Abuse Restraining orders, filing police reports and discussing the case at our monthly MDT meetings. With additional funding we may be able to provide more services such as litigation on behalf of the victim.

3. Specific to Legal Services, does the AAA's contract/agreement with the Legal Services Provider(s) (LSPs) specify that the LSPs are expected to use the California Statewide Guidelines in the provision of OAA legal services? **Yes/No, Discuss:**

The agreement that the AAA has with the Senior Advocacy Network references the Guidelines and has incorporated the specific instructions into that agreement. The Senior Advocacy Network continues to serve consumers with the greatest needs, according to state and federal requirements. The staff is trained and available to offer services to older persons and those with disabilities throughout Stanislaus County.

4. Does the AAA collaborate with the Legal Services Provider(s) to jointly establish specific priorities issues for legal services? If so, what are the top four (4) priority legal issues in your PSA? Yes/No, Discuss:

a. Affordable Housing/Homelessness – fewer seniors can afford to rent apartments and the waiting list for senior apartments can be up to 2 years. There is no new construction for senior housing which will continue to contribute to senior homelessness.

b. Elder Abuse – Financial abuse to seniors is increasing as family members and other organizations prey on seniors who have saved for their retirement. Family members see their parents'/grandparents' retirement savings as their inheritance and take from the seniors while they are still alive, sometimes leaving the senior homeless and penniless. District Attorneys usually will not prosecute these cases, referring them to civil attorneys and legal aids.

c. Consumer Issues/Unable to pay debts – many seniors do not have enough money for rent, utilities and medication so they often get behind in their rent, borrow from pay-day loans or reduce their medications or stop altogether if they can't afford it. Many have credit cards that go into default, then they are sued, and have a judgment on their record that can cloud the title of their home, if they own one.

d. Prosecution of Elder Abuse by District Attorney – The DA's Office refuses to prosecute the worst elder financial abuse cases. They cite the senior's dementia and mental capacity as making it impossible to litigate. That means that more and more persons are getting away with elder abuse crimes because they know nothing will happen.

5. Specific to Legal Services, does the AAA collaborate with the Legal Services Provider(s) to jointly identify the target population? If so, what is the targeted senior population in your PSA <u>AND</u> what mechanism is used for reaching the target population? Yes/No, Discuss:

The target population is older adults over the age of 60 who are financially, geographically, culturally, and socially disadvantaged. The Senior Advocacy Network staff or volunteers participate in specific outreach events in various communities throughout the County. Brochures for this agency are available in the AAA office lobby, which also serves consumers who are veterans and persons applying to access paratransit services. Their contact information is available in the AAA Information and Assistance brochure, also widely available at outreach events and in various offices throughout the County where older adults live and take advantage of services.

In addition, the Senior Advocacy Network has a close relationship with the AAA and we meet periodically to discuss issues pertaining to Older Adults. That is how we increased our presence in the senior housing arena and continue to look for more causes we can champion to make life in Stanislaus County easier for our older adults.

6. Specific to Legal Services, what is the targeted senior population and mechanism for reaching targeted groups in your PSA? **Discuss**:

The targeted senior population is residents of Stanislaus County who need legal services. We reach the target group through stories in the newspaper, speaking engagements, having information tables at senior events, handing out brochures and SCAM door hangers and referrals from Judges, Courts, the County Recorder, law enforcement and word of mouth. We are also active in several county-wide community partner groups that allow us to share information about our services with other direct services providers such as housing and homelessness providers, medical providers, inhome care providers, senior housing property management groups and more.

Our Executive Director is the 2nd Vice President for the Commission on Aging advisory board. She gives monthly reports and annual presentations to this group on new legal services being provided and updates on our housing and legal programs. This information is broadcast to the greater Stanislaus area through the voices of the other members of the commission as well as the various agencies and elected officials who attend these meetings.

7. How many legal assistance service providers are in your PSA? Complete table below.

Fiscal Year	# of Legal Assistance Services Providers
2020-2021	1
2021-2022	1

2022-2023	1
2023-2024	1

8. What methods of outreach are Legal Services providers using? **Discuss**:

In addition to the methods mentioned above (newspaper, speaking engagements, tabling at senior events, distributing brochures to partners), this year, SAN inaugurated an Outreach Workgroup that draws from the experience and expertise of four members of our staff. They are currently developing a social media outreach plan that will increase our online presence through FaceBook, Twitter, LinkedIn and NextDoor. We have also added an additional program called Legal on the Move that targets rural older adults by hosting educational housing rights presentations and pop-up legal clinics with attorneys present to assess legal housing needs and consumer issues and make referrals for more hands-on legal assistance.

Fiscal Year	Name of Provider	Geographic Region covered
2020-2021	Senior Advocacy Network	Stanislaus County
2021-2022	Senior Advocacy Network	Stanislaus County
2022-2023	Senior Advocacy Network	Stanislaus County
2023-2024	Senior Advocacy Network	Stanislaus County

9. What geographic regions are covered by each provider? Complete table below:

10. Discuss how older adults access Legal Services in your PSA: Discuss:

Older adults initially access our legal services by phone and then come into our office after an appointment has been scheduled. We have been providing remote assistance for our clients, but many do not have the technological savvy to use Zoom or other remote programs. They prefer to meet in person which we will do following strict COVID protocols. They can use public transportation, their own vehicles, Dial-a-Ride, get rides from friends or the Bridges program. We can facilitate home/hospital/assisted living visits for older adults that are unable to come to the office due to health issues.

In addition, we work with our clients to gather and obtain documents by mail, fax or drop off as necessary. In short, we prioritize in-person, in-office appointments but we are able to coordinate remote or out-of-office services as needed.

11. Identify the major types of legal issues that are handled by the Title IIIB legal provider(s) in your PSA. Discuss (please include new trends of legal problems in your area): **Discuss:**

- a. Elder abuse including financial elder abuse. As described above in question 5, financial abuse of elders is growing and goes unprosecuted for the most part.
- b. Housing eviction defense, landlord/tenant issues, fair housing, discrimination, reasonable accommodation
- c. Consumer issues including sending letters if a client is judgment proof of filing responses to complaints if the senior is sued and is NOT judgment proof
- d. Income/Public benefits counseling and referrals for SSI, SSA, Unemployment, Survivors Benefits, Veterans Benefits, CalFresh
- e. Free wills provided by our pro-bono attorney panel
- f. Powers of Attorney and Advanced Health Care Directives counseling and preparation of documents
- g. Utilities advocating for clients facing financial hardship with utility companies, negotiating settlements, etc.
- h. Discrimination housing, age, etc.
- i. Guardianships- we provide a guardianship clinic and help potential guardians completed their paperwork and provide advice on the court process and self-representation.
- **12.** What are the barriers to accessing legal assistance in your PSA? Include proposed strategies for overcoming such barriers. **Discuss:**

Mobility and transportation are the biggest barriers. Many clients who don't drive and rely on public transportation cancel appointments or have difficulty getting to our office. Phone and remote appointments are being offered for clients who have transportation challenges.

Language – clients who are hearing impaired or speak other languages have difficulty when calling our office to schedule appointments. Our office utilizes our language line for ANY language and helps aid the hearing impaired. In the past year, we have also hired three new Spanish speaking staff.

Assistance to bedbound or hospitalized- Clients who are bedbound or hospitalized are difficult to aid. We are making visits to the home or hospitals on weekends or evenings.

- **13.** What other organizations or groups does your legal service provider coordinate services with? **Discuss:**
 - a. Catholic Charities Ombudsman Program for elder abuse in long-term care facilities.
 - b. Catholic Charities Assisted Transportation

- c. Adult Protective Services for restraining orders, case management, HomeSafe
- d. Catholic Charities SSVF-VETFAM: Veteran's housing support services
- e. Stanislaus County Veterans Services Office for advocacy and affordable housing.
- f. Catholic Charities Senior Elder Abuse Prevention Alliance (SEAPA)
- g. HICAP for health insurance counseling.
- h. Project Sentinel for housing or landlord/eviction issues.
- i. District Attorney's office for MDT for elder abuse cases.
- j. Justice on Aging-receive homelessness prevention grant
- k. Stanislaus County Continuum of Care to represent seniors within the plan to distribute federal housing funds.
- I. State Bar of California for homelessness prevention and equal access
- m. Congressman Harder's office- Veterans, Social Security, or other Federal benefits
- n. Assembly Member Juan Alanis' office housing
- o. Housing Assessment Team Coordinated Entry referrals
- p. Community Housing and Shelter Services coordinate rental back-pay, utility payments
- q. Community Impact Central Valley housing
- r. DRAIL benefits advocacy, disability advocacy



Area Agency on Aging – PSA 30 Organization Chart

SECTION 22 - ASSURANCES

Pursuant to the Older Americans Act Reauthorization Act of 2020, (OAA), the Area Agency on Aging assures that it will:

A. Assurances

- 1. OAA 306(a)(2)
 - Provide an adequate proportion, as required under Older Americans Act Reauthorization Act of 2016 Section 307(a)(2), of the amount allotted for part B to the planning and service area will be expended for the delivery of each of the following categories of services—
 - (A) services associated with access to services (transportation, health services (including mental and behavioral health services) outreach, information and assistance, (which may include information and assistance to consumers on availability of services under part B and how to receive benefits under and participate in publicly supported programsfor which the consumer may be eligible) and case management services).
 - (B) in-home services, including supportive services for families of older individuals with Alzheimer's disease and related disorders with neurological and organic brain dysfunction; and
 - (C) legal assistance; and assurances that the Area Agency on Aging will report annually to the State agency in detail the amount of funds expended for each such category during the fiscal year most recently concluded;

2. OAA 306(a)(4)(A)(i)(I-II)

- (I) provide assurances that the Area Agency on Aging will -
 - (aa) set specific objectives, consistent with State policy, for providing services to older individuals with greatest economic need, older individuals with greatest social need, and older individuals at risk for institutional placement;
 - (bb) include specific objectives for providing services to low-income minority older individuals, older individuals with limited English proficiency, and older individuals residing in rural areas; and;
- (II) include proposed methods to achieve the objectives described in (aa) and (bb) of subclause (I);
- 3. OAA 306(a)(4)(A)(ii)
 - Include in each agreement made with a provider of any service under this title, a requirement that such provider will—
 - (I) specify how the provider intends to satisfy the service needs of lowincome minority individuals, older individuals with limited English proficiency, and older individuals residing in rural areas in the area

served by the provider;

- (II) to the maximum extent feasible, provide services to low-income minority individuals, older individuals with limited English proficiency, and older individuals residing in rural areas in accordance with their need for such services; and
- (III) meet specific objectives established by the Area Agency on Aging, for providing services to low-income minority individuals, older individuals with limited English proficiency, and older individuals residing in rural areas within the planning and service area.
- 4. OAA 306(a)(4)(A)(iii)

With respect to the fiscal year preceding the fiscal year for which such plan is prepared—

- (I) identify the number of low-income minority older individuals in the planning and service area;
- (II) describe the methods used to satisfy the service needs of such minority older individuals; and
- (III) provide information on the extent to which the Area Agency on Aging met the objectives described in Assurance number 2.
- 5. OAA 306(a)(4)(B)

Use outreach efforts that —

- (i) identify individuals eligible for assistance under this Act, with special emphasis on—
 - (I) older individuals residing in rural areas;
 - (II) older individuals with greatest economic need (with particular attention to low-income minority individuals and older individuals residing in rural areas);
 - (III) older individuals with greatest social need (with particular attention to low-income minority individuals and older individuals residing in rural areas);

(IV) older individuals with severe disabilities;

- (V) older individuals with limited English proficiency;
- (VI) older individuals with Alzheimer's disease and related disorders with neurological and organic brain dysfunction (and the caretakers of such individuals); and
 - (VII) older individuals at risk for institutional placement, specifically including survivors of the Holocaust; and
- (ii) inform the older individuals referred to in sub-clauses (I) through (VII) of clause (i),and the caretakers of such individuals, of the availability of such assistance;

6. OAA 306(a)(4)(C)

Contain an assurance that the Area Agency on Aging will ensure that each activity undertaken by the agency, including planning, advocacy, and systems development, will include a focus on the needs of low-income minority older individuals and older individuals residing in rural areas;

7. OAA 306(a)(5)

Provide assurances that the Area Agency on Aging will coordinate planning, identification, assessment of needs, and provision of services for older individuals with disabilities, with particular attention to individuals with severe disabilities, and individuals at risk for institutional placement with agencies that develop or provide services for individuals with disabilities;

8. OAA 306(a)(9)(A)-(B)

- (A) Provide assurances that the Area Agency on Aging, in carrying out the State Long-Term Care Ombudsman program under 307(a)(9), will expend not less than the total amount of funds appropriated under this Act and expended by the agency in Fiscal Year 2019 in carrying out such a program under this title;
- (B) Funds made available to the Area Agency on Aging pursuant to section 712 shall be used to supplement and not supplant other Federal, State, and local funds expended to support activities described in section 712;

9. OAA 306(a)(11)

- Provide information and assurances concerning services to older individuals who are Native Americans (referred to in this paragraph as "older Native Americans"), including—
- (A) information concerning whether there is a significant population of older Native Americans in the planning and service area and if so, an assurance that the Area Agency on Aging will pursue activities, including outreach, to increase access of those older Native Americans to programs and benefits provided under this title;
- (B) An assurance that the Area Agency on Aging will, to the maximum extent practicable, coordinate the services the agency provides under this title with services provided under Title VI; and
- (C) An assurance that the Area Agency on Aging will make services under the Area Plan available, to the same extent as such services are available to older individuals within the planning and service area, to older Native Americans.

10. OAA 306(a)(13)(A-E)

- (A) maintain the integrity and public purpose of services provided, and service providers, under this title in all contractual and commercial relationships;
 - (B) disclose to the Assistant Secretary and the State agency-

- (i) the identity of each nongovernmental entity with which such agency has a contract or commercial relationship relating to providing any service to older individuals; and
 - (ii) the nature of such contract or such relationship;
- (C) demonstrate that a loss or diminution in the quantity or quality of the services provided, or to be provided, under this title by such agency has not resulted and will not result from such contract or such relationship;
- (D) demonstrate that the quantity or quality of the services to be provided under this title by such agency will be enhanced as a result of such contract or such relationship; and
- (E) on the request of the Assistant Secretary or the State, for the purpose of monitoring compliance with this Act (including conducting an audit), disclose all sources and expenditures of funds such agency receives or expends to provide services to older individuals;
- 11. 306(a)(14)

Provide assurances that preference in receiving services under this Title will not be given by the Area Agency on Aging to particular older individuals as a result of a contract or commercial relationship that is not carried out to implement this title;

12.306(a)(15)

Provide assurances that funds received under this title will be used-

- (A) to provide benefits and services to older individuals, giving priority to older individuals identified in Section 306(a)(4)(A)(i); and
- (B) in compliance with the assurances specified in Section 306(a)(13) and the limitations specified in Section 212;

13: OAA 305(c)(5)

In the case of a State specified in subsection (b)(5), the State agency shall provide assurance, determined adequate by the State agency, that the Area Agency on Aging will have the ability to develop an Area Plan and to carry out, directly or through contractual or other arrangements, a program in accordance with the plan within the planning and service area.

14. OAA

307(a)(7)(

B)(B)

(i) no individual (appointed or otherwise) involved in the designation of the State agency or an Area Agency on Aging, or in the designation of the head of any subdivision of the State agency or of an Area Agency on Aging, is subject to a conflict of interest prohibited under this Act;

(ii) no officer, employee, or other representative of the State agency or an Area Agency on Aging is subject to a conflict of interest prohibited under

this Act; and

(iii) mechanisms are in place to identify and remove conflicts of interest prohibited under this Act.

15. OAA 307(a)(11)(A)

(i) enter into contracts with providers of legal assistance, which can demonstrate the experience or capacity to deliver legal assistance;
(ii) include in any such contract provisions to assure that any recipient of funds under division (i) will be subject to specific restrictions and regulations promulgated under the Legal Services Corporation Act (other than restrictions and regulations governing eligibility for legal assistance under such Act and governing membership of local governing boards) as determined appropriate by the Assistant Secretary; and
(iii) attempt to involve the private bar in legal assistance activities authorized under this title, including groups within the private bar furnishing services to

older individuals on a probono and reduced fee basis.

16. OAA 307(a)(11)(B)

That no legal assistance will be furnished unless the grantee administers a program designed to provide legal assistance to older individuals with social or economic need and has agreed, if the grantee is not a Legal Services Corporation project grantee, to coordinate its services with existing Legal Services Corporation projects in the planning and service area in order to concentrate the use of funds provided under this title on individuals with the greatest such need; and the Area Agency on Aging makes a finding, after assessment, pursuant to standards for service promulgated by the Assistant Secretary, that any grantee selected is the entity best able to provide the particular services.

17. OAA 307(a)(11)(D)

To the extent practicable, that legal assistance furnished under the plan will be in addition to any legal assistance for older individuals being furnished with funds from sources other than this Act and that reasonable efforts will be made to maintain existing levels of legal assistance for older individuals; and

18. OAA 307(a)(11)(E)

Give priority to legal assistance related to income, health care, long-term care, nutrition, housing, utilities, protective services, defense of guardianship, abuse, neglect, and age discrimination.

19. OAA 307(a)(12)(A)

Any Area Agency on Aging, in carrying out such services will conduct a program consistent with relevant State law and coordinated with existing State Adult Protective Service activities for -

- (i) public education to identify and prevent abuse of older individuals;
- (ii) receipt of reports of abuse of older individuals;

(iii) active participation of older individuals participating in programs under this Act through outreach, conferences, and referral of such individuals to other social service agencies or sources of assistance where appropriate and consented to by the parties to be referred; and (iv) referral of complaints to law enforcement or public protective service agencies where appropriate.

20. OAA 307(a)(15)

If a substantial number of the older individuals residing in any planning and service area in the State are of limited English-speaking ability, then the State will require the Area Agency on Aging for each such planning and service area -

(A) To utilize in the delivery of outreach services under Section 306(a)(2)(A), the services of workers who are fluent in the language spoken by a predominant number of such older individuals who are of limited English-speaking ability.
(B) To designate an individual employed by the Area Agency on Aging, or available to such Area Agency on Aging on a full-time basis, whose

responsibilities will include:

 (i) taking such action as may be appropriate to assure that counseling assistance is made available to such older individuals who are of limited English-speaking ability inorder to assist such older individuals in participating in programs and receiving assistance under this Act; and
 (ii) providing guidance to individuals engaged in the delivery of supportive services under the area plan involved to enable such individuals to be aware of cultural sensitivities and to take into account effective linguistic and cultural differences.

21. OAA 307(a)(18)

Conduct efforts to facilitate the coordination of community-based, long-term care services, pursuant to Section 306(a)(7), for older individuals who - (A) reside at home and are at risk of institutionalization because of limitations on their ability to function independently;

(B) are patients in hospitals and are at risk of prolonged institutionalization; or
 (C) are patients in long-term care facilities, but who can return to
 their homes if community-based services are provided to them.

22. OAA 307(a)(26)

Area Agencies on Aging will provide, to the extent feasible, for the furnishing of services under this Act, consistent with self-directed care.

B. Code of Federal Regulations (CFR), Title 45 Requirements:

23. CFR [1321.53(a)(b)]

(a) The Older Americans Act intends that the Area Agency on Aging shall be the leader relative to all aging issues on behalf of all older persons in the planning and service area. This means that the Area Agency shall proactively carry out, under the leadership and direction of the State agency, a wide range of functions related to advocacy, planning, coordination, inter-agency linkages, information sharing, brokering, monitoring and evaluation, designed to lead to

the development or enhancement of comprehensive and coordinated community based systems in, or serving, each community in the Planning and Service Area.

These systems shall be designed to assist older persons in leading independent, meaningful and dignified lives in their own homes and communities as long as possible.

(b) A comprehensive and coordinated community-based system described in paragraph (a) of this section shall:

(1) Have a visible focal point of contact where anyone can go or call for help, information or referral on any aging issue;

(2) Provide a range of options:

(3) Assure that these options are readily accessible to all older persons: The independent, semi-dependent and totally dependent, no matter what their income;

(4) Include a commitment of public, private, voluntary and personal resources committed to supporting the system;

(5) Involve collaborative decision-making among public, private, voluntary, religious and fraternal organizations and older people in the community;

(6) Offer special help or targeted resources for the most vulnerable older persons, those in danger of losing their independence;

(7) Provide effective referral from agency to agency to assure that information or assistance is received, no matter how or where contact is made in the community;
(8) Evidence sufficient flexibility to respond with appropriate individualized assistance, especially for the vulnerable older person;

(9) Have a unique character which is tailored to the specific nature of the community;
(10) Be directed by leaders in the community who have the respect, capacity and authority necessary to convene all interested persons, assess needs, design solutions, track overall success, stimulate change and plan community responses for the present and for the future.

24. CFR [1321.53(c)]

The resources made available to the Area Agency on Aging under the Older Americans Act are to be used to finance those activities necessary to achieve elements of a community based system set forth in paragraph (b) of this section.

25. CFR [1321.53(c)]

Work with elected community officials in the planning and service area to designate one or more focal points on aging in each community, as appropriate.

26. CFR [1321.53(c)]

Assure that services financed under the Older Americans Act in, or on behalf of, the community will be either based at, linked to or coordinated with the focal points designated.

27. CFR [1321.53(c)]

Assure access from designated focal points to services financed under the Older Americans Act.

CFR [1321.53(c)]

Work with, or work to assure that community leadership works with, other applicable agencies and institutions in the community to achieve maximum collocation at, coordination with or access to other services and opportunities for the elderly from the designated community focal points.

28. CFR [1321.61(b)(4)]

Consult with and support the State's Long-Term Care Ombudsman Program.

29. CFR [1321.61(d)]

No requirement in this section shall be deemed to supersede a prohibition contained in the Federal appropriation on the use of Federal funds to lobby the Congress; or the lobbying provision applicable to private nonprofit agencies and organizations contained in OMB Circular A-122.

30. CFR [1321.69(a)]

Persons age 60 and older who are frail, homebound by reason of illness or incapacitating disability, or otherwise isolated, shall be given priority in the delivery of services under this part.