

Department of Health and Human Services
ADMINISTRATION ON AGING
AND
OFFICE OF
INSPECTOR GENERAL

STATE IMPLEMENTATION OF THE
STEWARDSHIP REQUIREMENTS OF
THE OLDER AMERICANS ACT



APRIL 1993

ADMINISTRATION ON AGING

The Administration on Aging (AoA) is the principal Federal agency designed to carry out the provisions of the Older Americans Act (OAA). It advises the Secretary of Health and Human Services and other Federal agencies on the characteristics, circumstances and needs of older individuals. Further, it develops policies, plans, and programs designed to promote their welfare.

AoA administers three grant programs under the Older Americans Act. The largest program - Title III of the Act -- consist of formula grants to States to establish State and community-based programs for older individuals with the purpose of preventing the premature institutionalization of older individuals. The second program -- Title VI -- consists of discretionary grants with the same purpose as Title III, but to meet the unique needs of older Native Americans. The third program -- Title IV -- is also discretionary. Its purpose is to fund research, demonstration, and training activities to elicit knowledge and techniques to improve the circumstances of older Americans. (The 1992 Amendments to the OAA created a fourth program -- Title VII -- which provides funds for State activities to protect the rights of vulnerable older people. Prior to the 1992 Amendments, Title III of the OAA provided the funds for these activities.)

OFFICE OF INSPECTOR GENERAL

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The OIG's Office of Evaluation and Inspections (OEI) conducts short-term management and program evaluations (called inspections) that focus on issues of concern to the Department, the Congress, and the public. The findings and recommendations contained in these inspection reports generate rapid, accurate, and up-to-date information on the efficiency, vulnerability, and effectiveness of departmental programs.

THIS REPORT

This report is the result of a joint effort between AoA and OIG/OEI to assess the implementation of Title III of the Older Americans Act. OIG staff in the New York and Dallas regional offices provided technical support to the joint project. AoA staff in New York and Dallas directed the project with all regional offices participating in the development of instruments and data collection.

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APRIL 1993 OEI-O2-91-01512

EXECUTIVE SUMMARY

PURPOSE

To review State Units' on Aging (SUA) implementation of the stewardship requirements of Title III of the Older Americans Act (OAA).

BACKGROUND

In an effort to strengthen its stewardship of the OAA, the Commissioner of the Administration on Aging (AoA) requested technical assistance from the Office of Inspector General (OIG) in designing a review of their primary Title III grantees -- SUAs. After reviewing traditional and current stewardship activities, and discussing potential approaches for future efforts, we agreed that a review of individual States would be instituted in such a way as to provide the Commissioner with an overview of how States are implementing key components of Title III. In order to conserve limited travel funds the reviews would be conducted on a sample of States and would focus on only five programmatic areas -- stewardship, targeting, ombudsman, nutrition, and financial management.

This report on stewardship addresses the primary operating relationship between each SUA and its area agencies on aging. It focuses on issuing guidance on and monitoring implementation of the key requirements of Title III of the OAA, including the area planning process.

METHODOLOGY

The reviews were conducted in a stratified, random sample of 20 States based upon the population of individuals over 60 years of age in each State. In the first step of the sampling process, States were divided into four strata based upon the number of older individuals in each State. In the second step, five States were selected from each stratum. This stratified, random sample permits a generalization of findings from the 20 sample States to the Nation.

FINDINGS

Area Planning And Review Work Well, But There Are A Few Weaknesses

- 43 percent do not address coordination with mental health agencies
- 36 percent do not address evaluation of outreach
- 29 percent do not address coordination with long term care agencies

Waivers Are Common, But Do Not Always Follow Procedures

- Most States grant direct service waivers
- Many States do not follow adequate proportion waiver requirements

Assessments Address Most Requirements, But Not Always Annually

- One-third of States do not conduct annual on-site assessments of area agencies
- A variety of methodologies are used to assess area agencies on aging
- Coordination with mental health and long term care agencies, as well as evaluation of outreach, is often missing from assessments

All Area Agencies on Aging Evaluate Activities And Conduct Public Hearings, But Many Do Not Assess The Effectiveness of Outreach

- Only half of States report all of their area agencies have conducted annual outreach evaluations

State Agencies Provide Technical Assistance And Training To Address Area Agencies on Aging Deficiencies

- 63 percent of States still report having unmet training and technical assistance needs that must be addressed

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INTRODUCTION

PURPOSE

To review State Units' on Aging (SUA) implementation of the stewardship requirements of Title III of the Older Americans Act (OAA). In this report, the term "stewardship" refers to the primary operating relationship between each SUA and its area agencies on aging. It focuses on issuing guidance on and monitoring implementation of the key requirements of Title III of the OAA, including the area planning process.

BACKGROUND

Under the OAA, the Administration on Aging (AoA) serves as the principal Federal advocate for older individuals, providing national leadership in the development of programs to address their needs. Through Title III of OAA (Grants for State and Community Programs on Aging), AoA encourages and assists SUAs and area agencies on aging (AAAs) to implement a system of coordinated community-based services to prevent the premature institutionalization of older individuals by allowing them to remain in their own community.

Under Title III, AoA distributes approximately \$765 million in formula grants to States based on the age 60+ population within each State. The SUAs use about 5 percent of the grant on administration, and then fund AAAs who then contract for the supportive services, nutrition services and multipurpose senior centers. The single largest component of Title III, the nutrition program, provides approximately \$450 million for congregate and home-delivered meals. Other key program components include supportive services (i.e., access services, in-home services and legal assistance) and the Ombudsman program which serves as an advocate for residents in long term care facilities.

One of AoA's major administrative responsibilities is to provide stewardship over the States' implementation of the Title III program. However, AoA's capacity to carry out its stewardship responsibilities declined substantially during the 1980's due to a significant reduction in resources. More specifically, AoA sustained a 47 percent reduction in staff and 75 percent reduction in travel funds. Each regional office had only \$2,000 annually for travel. Because they could not monitor SUAs', AoA became further and further removed from the activities of the SUAs and their area agencies on aging.

In an effort to strengthen its stewardship of the OAA, the Commissioner of AoA requested technical assistance from the Office of Inspector General (OIG) in designing a review of their primary Title III grantees -- SUAs. In response to the Commissioner's request, OIG staff met with key AoA headquarters and regional staff to identify traditional and current stewardship activities, and to discuss potential

approaches for future efforts. As a result, we agreed that the review of individual States would be instituted in such a way as to provide the Commissioner with an overview of how States are implementing key components of Title III. The OIG agreed to assist AoA in developing national, standardized review instruments for key components of Title III and in writing a report summarizing States' implementation of the Act. We also agreed that in order to conserve limited travel funds the reviews would be conducted on a sample of States and would focus on only five programmatic areas -- stewardship, targeting, ombudsman, nutrition, and financial management.

Designing the review began with the meeting of a review team of OIG and selected AoA regional staff. They brainstormed approaches, identified Federal reporting and operating requirements for SUAs and AAAs, and drafted instruments containing the review questions and criteria. The draft instruments were shared with AoA headquarters staff and each regional office for comments, and then revised to reflect comments.

The OIG/AoA review teams pre-tested the instruments and data collection methodology by conducting reviews for each of the five instruments in six States located in four different Federal regions. The pre-test identified that a great deal of time was lost explaining criteria (interpreting law and regulation) and searching for documentation. Accordingly, the review team modified each of the instruments and changed the data collection methodology. The most significant change to the methodology required the sharing of the review instruments with the States prior to the site visit in the belief that if States are aware of and understand the review criteria being used during the review, they will be better prepared to provide required documentation and to discuss specific issues.

METHODOLOGY

The reviews were conducted in a stratified, random sample of 20 States based upon the population of individuals over 60 years of age in each State. These are the same data used to allocate Title III funds among States. In the first step of the sampling process, States were divided into four strata based upon the number of older individuals in each State. In the second step, we selected five States from each stratum. This stratified, random sample permits us to generalize findings from the 20 sample States to the Nation. Table I indicates those States selected for the review process (See Table I).

We also used sampling techniques during site visits to each State for the reviews of specific area plans and assessments. In these instances, we selected a simple, random sample of 10 AAAs prior to the visit to review on-site. For those States with less than 10 AAAs, all AAAs were included in the review.

TABLE I

SAMPLE STATES			
Stratum 1	Stratum 2	Stratum 3	Stratum 4
California Pennsylvania New York Texas Florida	Michigan Indiana Massachusetts Georgia North Carolina	Wisconsin Colorado Oklahoma Maine Oregon	New Hampshire North Dakota Nevada District of Columbia Montana

The data collection was conducted in two phases -- an AoA regional office desk review and an on-site review at the SUA. During the desk review phase, we looked at area plan guidance and program instructions, as well as the State's assessment instruments for AAAs to determine if they are consistent with Federal law and regulations. We also reviewed priority services waivers and targeted populations participation data from the State Program Report for Title III.

Following the desk review, each State was sent a proposed agenda for the site visit, a listing of the AAAs whose area plans and assessment reports will be reviewed, a copy of the stewardship review instrument (Appendix A), and the findings from the desk review to be discussed during the site visit.

The review instrument focused on the guidance SUAs issued to AAAs, on key requirements of Title III, and on the instruments and procedures they use to assess AAAs with those requirements. A review of area plans and assessment reports determine whether, and to what extent, they reflect OAA requirements. The instruments also focus on the issues of SUA operating procedures, and on training and technical assistance activities.

We entered data from the stewardship review instruments into three databases. One database contained the responses to the open- and closed-ended questions on the instrument and the other two contained the reviews of 151 area plans and assessments. The number of responses to questions vary because some questions did not apply to the four States in Stratum 4 -- NH, ND, NV, & DC -- which are single planning and service area (SPSA) States.

The percentages cited in this report are based on the responses to specific questions contained in the review instrument. The responses are weighted to reflect the sampling plan and are projected to the Nation. The precision at the 90-percent confidence intervals vary for each question from plus or minus 6 to 21 percent based upon the nature of the question (categorical or continuous) and the number of respondents to each question.

FINDINGS

AREA PLANNING AND REVIEW WORK WELL, BUT THERE ARE A FEW WEAKNESSES

All States have issued guidance to their area agencies on aging (AAAs) on the development and content of area plans. In general, they have fully addressed Section 306 of the Older Americans Act (OAA), which outlines what an area plan "shall" contain and what AAAs "will" do. The States' guidance satisfactorily addresses a majority of the areas outlined in Section 306. For a majority of the States, this guidance delineates or highlights the specific Section 306 provisions with the expectation that the AAAs specify how they will accomplish these legislative mandates. (However, in at least 28 percent of the States "general boilerplate assurance statements" are used to certify compliance with Section 306.) In these instances, there is no indication in the area plans as to how the AAA will meet the Section 306 requirements.

Three criteria that are important to the overall development of a comprehensive service system were not addressed by a significant percentages of States in their guidance to the AAAs. Specifically:

- 1) 43 percent of States do not address the requirement that AAAs coordinate Title III-B mental health services with the services of other mental health agencies (Sec. 306(a)(6)(M));
- 2) 36 percent of States do not address the requirement that the AAAs will conduct an annual evaluation of the effectiveness of outreach to eligible individuals for the program with special emphasis on various targeted populations in our programs (Sec. 309(a)(6)(A)).
- 3) 29 percent of States do not address the requirement to involve long term care facility providers in community-based system of long term care (Sec. 306(a)(6)(K)); and

To better understand why these criteria were missing in the States' area plan format, we asked each State that failed to address these criteria to explain how they ensure that AAAs were meeting the specific requirements of the Older Americans Act. This recognized that SUAs can make AAAs aware of a requirement without necessarily including it in their area plan format or guidance. In a majority of cases, however, States did not make AAAs aware of the requirements nor did they review area plans to insure that requirements were addressed. This occurred in 5 of the 7 States in our sample that did not have guidance on coordination of Title III mental health services, and in 4 of the 5 States that did not have guidance on conducting an annual evaluation

of outreach or on facilitating the involvement of long-term care providers in coordinating community based long-term care.

Two other Sections of 306 were frequently not addressed in the States' guidance. Forty-four percent of States do not address volunteer opportunities for older individuals in day care services for children and adults, and in respite care for families (Sec. 306(a)(6)(E)), and 27 percent of States do not address the stipulation that AAAs compile and provide list of higher education courses (Sec. 306(a)(6)(O)).

Most States (76 percent) use the area plan as a larger planning document to incorporate State requirements and informational needs of the State agencies in addition to those stipulated in Section 306. Most frequently these include:

- 1) non-AoA Title III funded Federal and State programs;
- 2) additional programmatic areas (e.g., AAA accomplishments, program evaluation objectives, corporate eldercare) and financial information (e.g., carryover, performance-based contracting); and
- 3) additional administrative/management areas required by the State Agencies (e.g., area agency on aging administrative goals, affirmative action plans, mission statements and client tracking objectives).

Planning cycles and update frequencies vary significantly among the States: 36 percent have a 4-year area plan cycle; 38 percent a 3-year plan cycle; and 26 percent a 2-year cycle. In reviewing the actual dates of the area plans, 43 percent operate under the Federal fiscal year calendar; the remainder have fiscal years with other starting and ending dates. Most States (86 percent) require AAAs to update the area plans at least annually. However, 9 percent update every two years, and the remaining 5 percent update on an "as needed" basis.

All States have formal procedures to review area plans. State agencies send written notices to AAAs when plans do not meet, or only partially meet, the State's review criteria. Technical assistance is provided by phone or in writing. Responses are required from the AAAs to the review (usually in 30 to 45 days) and acceptable revisions must be presented.

Though not stipulated in the language of the OAA or related regulations, 22 percent of States grant AAAs "conditional approvals" of deficient area plans. These AAAs receive their funding allocation, but are notified that funds can be withheld if "conditions" are not addressed by a specific date. Conditional approvals most often result from inadequate information, or the non-submission of specific programmatic or fiscal components required by the States in their instructions. Thirty percent of the AAAs in such States were conditionally approved at the time of the review.

For those Section 306 requirements most often not addressed in the actual area plans,

a close correlation was found between the lack of SUA guidance and the lack of AAA discussion in the actual area plans. For example, we noted earlier the lack of guidance on higher education, mental health, and day or respite care. In the review of 151 area plans we found that 45 percent of the plans do not address the criterion to list higher education courses; 45 percent do not address criterion to coordinate with mental health agencies; and 30 percent do not address the criterion to provide opportunities in day care centers.

WAIVERS ARE COMMON, BUT DO NOT ALWAYS FOLLOW PROCEDURES

Section 307(a)(10) stipulates that an AAA cannot directly provide supportive services, nutrition services, or in-home services, unless the State approves a waiver. Most States (86 percent) have criteria for approving requests for the direct provision of supportive, nutritional, or in-home services by the AAAs. States report that State regulations and/or policy usually stipulate these criteria. In general, documentation is required from the AAAs assuring no other available provider can effectively and efficiently provide that service in terms of program quality and economic cost. Also, 5 percent of States prohibit any direct provision of services by any of their AAAs.

Most States (79 percent) grant approval to their AAAs to directly provide supportive, nutritional or in-home services. Among the AAAs in those States: 41 percent directly provide supportive services; 36 percent directly provide nutrition services; and 24 percent directly provide in-home services.

Section 306(b)(1) of OAA, permits each State to waive the requirements for expending an adequate proportion of Title III-B funds for access services, in-home services and legal assistance. Regarding this adequate proportion requirements, 33 percent of States grant waivers to their AAAs. Of these States: 2 percent granted waivers for access services to 27 percent of their AAAs; 22 percent gave waivers for in-home services to 18 percent of their agencies; and 16 percent provided waivers for legal assistance to 6 percent of their agencies. However, 82 percent of these States did not publish their intent to grant the waiver, nor did they provide AoA with a report on the waiver, as required in Section 306(b)(2)(A).

ASSESSMENTS ADDRESS MOST REQUIREMENTS, BUT NOT ALWAYS ANNUALLY

Generally, States concentrate their on-site assessment efforts on reviewing programmatic areas and issues considered as SUA or AoA priorities. The on-site assessment review often concentrates on reviewing AAAs' progress in implementing area plans and, in the case of single planning and service area States, service providers' progress in implementing service plans.

Assessment Instrument Content And Format

States are generally addressing many of the requirements identified in Section 306.

However, a significant percentage of States do not address certain areas identified in Section 306(a)(6), which stipulates activities AAAs "will" do.

Some of the more significant activities frequently missing on assessment instruments are:

- 1) 47 percent do not have criteria to determine if AAAs conduct an annual evaluation of outreach (Sec. 306(a)(6)(A));
- 2) 46 percent do not have criteria to determine if AAAs coordinate Title III-B mental health services (Sec. 306(a)(6)(M)) or to identify agencies working in areas of abuse, neglect and exploitation (Sec. 306(a)(6)(J)); and
- 3) 44 percent of States do not have criteria to determine if AAAs facilitate involvement of long-term care providers in coordinating community based long-term care services (Sec. 306(a)(6)(K)).

Other criteria frequently missing from State assessment instruments are: 1) 60 percent of States do not address area agencies' activities in providing volunteer opportunities in day care services for children and adults (Sec. 306(a)(6)(E)); and 2) 54 percent do not determine if AAAs compile a list of higher education courses (Sec. 306(a)(6)(O)).

Regarding those criteria missing from SUA assessment instruments, States were asked to explain how they ensure that AAAs were meeting the related requirements of the OAA. A majority of the responses revealed that the States do not review AAAs activities in those areas. For example, all of the States not having the criterion regarding conducting an annual evaluation of outreach reported that they do not review AAAs activities. This could help explain in part why only half of the States report that all of their AAAs conducted the annual evaluation of the effectiveness of outreach.

Regarding compiling listings of higher education courses, all of the States without the criterion reported that they do not review this activity. One State commented that its highest priority is to ensure the efficiency and operations of those programs and activities that address those most in need. Efforts to ensure that AAAs are compiling and providing information on higher education courses were therefore not a priority.

Most States have also added "other significant items" to their assessment instruments to obtain a comprehensive review of their AAAs. These include review items on:

- 1) additional State requirements on programs (e.g., targeting, nutrition volunteer, senior centers, eldercare);
- 2) area agency on aging administration and program management (e.g., policies and procedures, staffing and organization);
- 3) additional State requirements on financial management (e.g., procurement, contract management, accounting systems);

- 4) review of non-AoA programs administered by the AAAs; and
- 5) identification of best practice models.

In conducting this review, we obtained an overview of a variety of methods, used by sample States, to assess their AAAs. In one State agency, a "field administration unit" (part of the larger umbrella agency in which the SUA is housed) conducts quarterly site visits of the area agencies to review "management issues" and track achievement of "goals and objectives." This allows SUA staff to focus on the in-depth evaluation of the operations of the area agencies during their on-site visit.

Another State agency reported that it conducts its overall assessment in a "three-cycle" process starting with the area plan development and review process. In the second cycle, the area agency completes a "compliance review checklist" that the State agency staff reviews and verifies, based on available documents at the State agency. In the third cycle, the State agency program and fiscal staff conducts the on-site review of the management of the agencies' programs.

And another State agency conducts a "focused assessment" in addition to its overall assessment. The focused assessment is conducted on a specific area of concern (e.g., subcontractor monitoring) identified as a specific weakness of the area agencies based on the previous year's assessments. Through the focused assessment, the State agency is able to conduct a comprehensive evaluative review which would identify specific areas of weakness and pinpoint areas needing technical assistance. Through this process, the State agency can determine how specific programs are operating and assist in identifying best practice models for use by other AAAs.

Frequency Of On-Site Assessments

The statutory basis for the expectation that State agencies assess and monitor the activities of AAAs is seen in Section 307(a)(8). Through the years, AoA and many State agencies have interpreted and instituted the practice of conducting "an annual on-site assessment" of area agencies to evaluate their programs and activities. Only 32 percent of States report conducting on-site assessments of all AAAs annually; another 35 percent report doing so on a semi-annual basis. The remaining 33 percent of States conduct them less frequently (e.g., every 18 months, every two years).

A closer review of the 6 sample States who reported not doing at least an annual on-site evaluation shows that two reported that their "official policy" is to do an annual on-site visit; however, in practice this has not taken place. One of these States did it every 2 years and the other tried to do them all but missed several area agencies in its annual review. For the other States, one conducted an annual on-site assessment for a quarter of its agencies; another did the on-site assessment every 18 months (to correspond to their 3-year Area plan cycle); and two States reported that their last on-site assessments of area agencies took place in FYs 1989 and 1988.

In discussing their experiences in conducting the annual on-site assessments, several

States commented on the "severe State budgetary constraints" they are experiencing which have affected the operations of the State agency. These budgetary constraints have resulted in the reduction of State agency staff and travel funds which have impacted on their ability to conduct annual assessments. These constraints have also forced the States to re-examine the frequency and the content of their on-site reviews. States have commented that the practice of conducting an annual, on-site assessment review may not be feasible in the near future in light of continuing budgetary constraints.

Other Methodologies Used To Monitor AAAs

Beyond periodic, on-site assessments, States use other methodologies to monitor the performance of AAAs. In some instances this monitoring addresses criteria not included in the formal assessment. Most frequently this monitoring is as follows:

- 1) Ninety-six percent of States use on-site reviews. These on-site reviews used to verify documentation and data submitted on program and financial reports, and to follow-up on identified issues. They are also used to attend public hearings, advisory council meetings, training seminars, and to observe actual provision of services by providers;
- 2) Seventy-eight percent utilize the review and analysis of monthly or quarterly program and fiscal reports. Reports are reviewed for trends and comparison of actual and projected service and financial data. These reports allow States to monitor service costs, service provision, participation rates, and targeting efforts of area agencies. Telephone contacts and/or on-site visits are use to follow up on deficiencies revealed through the reports; and
- 3) Twenty-eight percent conduct desk reviews of self assessment forms. Follow-up site visits or telephone interviews are usually used to verify responses.

ALL AAAs EVALUATE ACTIVITIES AND CONDUCT PUBLIC HEARINGS, BUT MANY DO NOT ASSESS THE EFFECTIVENESS OF OUTREACH

Section 306(a)(6)(A) of OAA stipulates that the area agency on aging will conduct periodic evaluations of, and public hearings on, activities carried out under their area plan, and will conduct an annual evaluation of the effectiveness of outreach to eligible individuals for the program, with special emphasis on specific targeted populations. All States report their AAAs have conducted both the annual evaluations of area plan activities and the annual public hearings. However, only 49 percent report that all of their AAAs have conducted the annual evaluation of the effectiveness of outreach. Of those States who report that not all of their AAAs have conducted the annual evaluation of outreach, 29 percent of States did not know whether the evaluations

have occurred; the remaining States report from 12.5 to 85 percent of their AAAs have conducted the evaluation of the effectiveness of outreach.

Though not a requirement of OAA, 42 percent of States report analyzing the AAAs evaluations of outreach. Of those States, 36 percent commented that effective outreach in a time of level and limited service dollars has raised additional programmatic concerns. It creates waiting lists and a demand for services that area agencies have difficulty supplying.

SUAs PROVIDE TECHNICAL ASSISTANCE AND TRAINING TO ADDRESS AAA DEFICIENCIES

The most commonly reported deficiencies identified by the SUAs' assessments of AAAs were:

- contracting, monitoring and provision of technical assistance to subgrantees or service providers;
- administrative and management issues (e.g., training, shortage of staff);
- program administration (e.g., service coordination, documentation of services, needs assessments);
- reporting (e.g., data collection, analysis, delinquent reports); and
- weaknesses in various programmatic areas (e.g., targeting and low-income participation, advisory council composition and use, outreach).

Regarding the type of technical assistance provided by the State agencies, States have attempted to address many of the deficiencies identified in the assessments. The most common types of technical assistance and training provided by States are in the areas of: 1) program administration and management (e.g., area plan development and planning, monitoring and assessments, recruitment of staff, directors' training); 2) grant/financial management (e.g., budgeting, preparation of RFPs, financial management, performance-based contracting); 3) reporting; and 4) State policies and procedures (e.g., policy and program interpretations). In addition, a wide variety of specific programmatic areas were identified. These include nutrition services, advisory councils, serving older persons with disabilities, implementation of the Americans with Disabilities Act and its impact on OAA programs, targeting and community-based systems of care.

States also use other methods to determine and identify the need for technical assistance and training. They include:

- direct requests from area agencies and providers;
- analysis of monitoring and assessment findings;
- review and analysis of program and fiscal reports;
- changes in Federal/State program priorities and policies; and
- State agency training survey.

Despite their ongoing technical assistance efforts, 85 percent of States report their area agencies still have unmet training and technical assistance needs. The most common are:

- program and financial management (particularly in the areas of reporting, management information systems, and monitoring);
- resource development and cutback management;
- targeting;
- new network personnel;
- advisory councils; and
- wide variety of programmatic areas (most frequently mentioned- outreach and use of volunteers).

In addition, 63 percent of States report that they also have unmet technical assistance and training needs. They include having a better understanding of what AoA wants in terms of assessments, monitoring and evaluation of programs, priorities of AoA, service expectations in terms of quality and quantity, and identification of best practice models. Other State unmet technical assistance and training needs are targeting, reporting (service data gathering and analysis), and a variety of specific program areas (e.g., Americans with Disabilities Act, cost sharing and managing with declining resources).

APPENDIX A

Review Instrument For Stewardship

STEWARDSHIP COMPLIANCE REVIEW

Department of Health and Human Services Administration on Aging

State _____ Date _____

Primary Respondent _____ Telephone _____

Review Team Leader _____ Telephone _____

1. *Prior to the on-site visit, obtain a copy of the Area Plan format provided to Area Agencies on Aging (AAAs) from the State Agency on Aging (State Agency). Review and determine whether or not the Area Plan format addresses the criteria identified in the following table. Indicate your responses with an X in the appropriate column reflecting these codes:*

Y (Yes) = Total Compliance with Criteria
P (Partial) = Partial Compliance with Criteria
N (No) = Not in Compliance with Criteria

	CRITERIA	Y	P	N	COMMENTS
a1	Sec. 306(a)(2) contain an assurance that an adequate proportion of Title III-B will be expended for access, in-home, and legal assistance,...				
a2	specify annually, amounts expended in previous fiscal year for access, in-home and legal assistance;				
b	Sec. 306(a)(3) & 1321.3 designate community focal points for services;				
c	Sec. 306(a)(4) establish and maintain information and referral services;				
d1	Sec. 306(a)(5) assure that preference is given to serving those of greatest economic or social needs (particularly low-income minorities)...				
d2	have proposed methods to serve those of greatest economic or social needs...				

	CRITERIA	Y	P	N	COMMENTS
d3	assure each service provider agreement will specify how the service provider will serve low-income minorities...in at least the same proportion...				
d4	identify numbers of and describe methods used to serve low-income minorities in previous fiscal year...				
d5	assure use of outreach methods...with special emphasis on rural elderly, greatest economic or social needs (with particular attention to low-income minorities), and severe disabilities;				
e1	Sec. 306(a)(6) conduct periodic (at least annually) evaluations				
e2	conduct public hearings on Area Plan activities...				
e3	conduct an annual evaluation on outreach...				
e4	provide technical assistance to service providers...				
e5	consider views of recipients of services in the development and administration of Area Plan...				
e6	monitor, evaluate, and comment on policies, actions...affecting elderly...				
e7	provide volunteer opportunities for older individuals in day care services for children and adults and respite for families...				
e8	establish an Area Agency advisory council...				
e9	develop and publish methods for determining priority of services...				
e10	establish procedures for coordinating Title III programs with other Federal programs as specified in Sec. 203(b)...				
e11	facilitate coordination with community-based, long-term care services...				
e12	identify agencies and organizations working in areas of abuse, neglect, and exploitation of older people...				
e13	determine unmet service needs of abused, neglected, and exploited older individuals...				
e14	facilitate involvement of long-term care providers in coordinating community-based long-term care services...				
e15	coordinate priority services with Alzheimer's disease organizations...				

	CRITERIA	Y	P	N	COMMENTS
e16	coordinate Title III-B mental health services with the services of other mental health agencies and organizations...				
e17	conduct outreach services to older Indians...				
e18	compile and provide list of higher education courses available to and enrollment policies for older individuals in each planning and service area...				
f	Sec. 306(a)(7) assure proper use of Title III-D funds...				
g	Sec. 306(a)(10) assure proper use of Title III-G funds...				

At this point, you should have completed the in-house compliance review of the area plan format provided to the AAAs. For each criteria 1a-1g indicating an entry of NO or PARTIAL, list it in the first column of question 2 prior to the on-site interview. Ask question 2 during the on-site visit following the brief explanation initiating the interview.

- A few weeks ago, we requested a copy of the area plan format provided to the Area Agencies on Aging concerning stewardship. This format was reviewed against Section 306 of the Older Americans Act. During this review, we identified parts of Section 306 which were only partially addressed, or which were not addressed in your area plan format. For these, I need to understand how the State Agency directs and guides the AAAs to ensure that stewardship requirements are met for those criteria not addressed or partially addressed in your area plan format.

Criteria # with
No or Partial

Agency Response

_____	_____
_____	_____
_____	_____
_____	_____

4. What are the beginning and ending dates of your most current Area Plan

- a. Beginning date - _____
- b. Ending date - _____

5. IF MULTI-YEAR PLANS: How often are they up-dated? _____

6. What follow-up procedures do you have to address sections in Area Plans that did not meet or only partially met criteria of the State Agency's Area Plan review?

- a. _____

b. _____ Don't Know (*Check if applicable*)

7. Are any AAAs operating under a "conditionally" approved Area Plan?

a. _____ Yes, (*If yes*),

(1) How many AAAs have conditional approval for Area Plans?

_____ (*indicate number*)

(2) What factors may generally result in a conditional approval?

- (a) _____
- (b) _____
- (c) _____
- (d) _____
- (e) _____ Don't Know (*Check if applicable*)

b. _____ No (*If No, skip to question 9*)

c. _____ Don't Know (*Check if applicable*)

8. What are State Agency procedures to bring conditionally-approved Area Plans into full approval?

- a. _____

b. _____ Don't Know (*Check if applicable*)

9. Does the State Agency have any criteria for approving the direct provision of supportive services, nutrition services, or in-home services?

a. _____ Yes *(If yes), What are they?*

b. _____ No

c. _____ Don't Know *(Check if applicable)*

10. Are any AAAs approved by the State Agency to directly provide supportive services, nutrition services or in-home services?

a. _____ Yes

b. _____ No *(If No, skip to question 12)*

c. _____ Don't Know *(Check if applicable)*

11. What are the number of AAAs providing each?

a. _____ Number of AAAs directly providing supportive services

b. _____ Number of AAAs directly providing nutrition services

c. _____ Number of AAAs directly providing in-home services

d. _____ Don't Know, *(Identify whether Don't Know applies to a, b, c, or combination):*

12. State Agencies have the ability to waive the adequate proportion requirement for Title III-B services. How many AAAs have been granted waivers for: *(Fill-in with a-c and record response)*

a. _____ Access services?

b. _____ In-home services?

c. _____ Legal assistance services?

d. _____ Don't Know, *(Identify whether Don't Know applies to a, b, c, or combination):*

[NOTE: ATTACHMENT B PERTAINS TO IN-HOUSE DESK REVIEW OF AAA WAIVERS - IF ANY INFORMATION IS MISSING OR INDICATES DISCREPANCIES, ASK ABOUT THESE DURING THE ON-SITE VISIT AT THIS POINT]

13. *Prior to the on-site visit, obtain a copy of the instrument used by the State Agency to assess compliance and performance of AAAs with stewardship law and regulations. If the questions on stewardship are part of a larger review instrument, ask the State Agency to identify or highlight those items pertaining to the review of stewardship practices. Have the State Agency mark the instrument(s) with the applicable criteria (e.g., a, b, c, etc.) using a provided copy of the criteria. This informational request should be included in the letter that is sent to the State Agency outlining the Compliance Review. Review and determine whether or not the assessment instruments address the stewardship criteria identified in the following table. Indicate your responses with an X in the appropriate column reflecting these codes:*

*Y (Yes) = Total Compliance with Criteria
P (Partial) = Partial Compliance with Criteria
N (No) = Not in Compliance with Criteria*

During the desk review, if the assessment instrument and related materials do not include those items necessary to make a determination of compliance (Y, P, or N), mark NA (Not Available) in the Comments section of the table.

	CRITERIA	Y	P	N	COMMENTS
a1	Sec. 306(a)(2) contain an assurance that an adequate proportion of Title III-B will be expended for access, in-home, and legal assistance,...				
b	Sec. 306(a)(3) & 1321.3 designate community focal points for services:				
c	Sec. 306(a)(4) establish and maintain information and referral services:				
d1	Sec. 306(a)(5) assure that preference is given to serving those of greatest economic or social needs (particularly low-income minorities)...				
d2	have proposed methods to serve those of greatest economic or social needs...				
d3	assure each service provider agreement will specify how the service provider will serve low-income minorities...in at least the same proportion...				

	CRITERIA	Y	P	N	COMMENTS
d5	assure use of outreach methods...with special emphasis on rural elderly, greatest economic or social needs (with particular attention to low-income minorities), and severe disabilities;				
e1	Sec. 306(a)(6) conduct periodic (at least annually) evaluations				
e2	conduct public hearings on Area Plan activities...				
e3	conduct an annual evaluation on outreach...				
e4	provide technical assistance to service providers...				
e5	consider views of recipients of services in the development and administration of Area Plan...				
e6	monitor, evaluate, and comment on policies, actions...affecting elderly...				
e7	provide volunteer opportunities for older individuals in day care services for children and adults and respite for families...				
e8	establish an Area Agency advisory council...				
e9	develop and publish methods for determining priority of services...				
e10	establish procedures for coordinating Title III programs with other Federal programs as specified in Sec. 203(b)...				
e11	facilitate coordination with community-based, long-term care services...				
e12	identify agencies and organizations working in areas of abuse, neglect, and exploitation of older people...				
e13	determine unmet service needs of abused, neglected, and exploited older individuals...				
e14	facilitate involvement of long-term care providers in coordinating community-based long-term care services...				
e15	coordinate priority services with Alzheimer's disease organizations...				
e16	coordinate Title III-B mental health services with the services of other mental health agencies and organizations...				
e17	conduct outreach services to older Indians...				

	CRITERIA	Y	P	N	COMMENTS
e18	compile and provide list of higher education courses available to and enrollment policies for older individuals in each planning and service area...				
f	Sec. 306(a)(7) assure proper use of Title III-D funds...				
g	Sec. 306(a)(10) assure proper use of Title III-G funds...				

For each criteria 13a-13g indicating an entry of NO, PARTIAL, or NOT AVAILABLE, list it in the first column of question 14 prior to the on-site interview. NOTE: For those items marked NA as a result of the desk review, State Agency responses may indicate converting the NA to Y, P, N, or to CMSL (Criteria met at State level) or NSC (State Agency does not address this applicable Federal criteria). Ask question 14 during the on-site visit.

14. We have reviewed your assessment instrument for AAAs and note that some requirements of Sec. 306 of the OAA are not covered. How do you ensure that AAAs are meeting the requirements of the Older Americans Act in the following areas?

Criteria # with
No, Partial, or
Not Available entry

Agency Response

(If additional space is required, use the back of the previous page.)

15. Beyond that required by Federal law or regulation, what significant items have you added to your assessment instrument for assessing AAAs?

a. _____

b. _____ Don't Know (*Check if applicable*)

16. How frequently does the State Agency perform on-site assessments of AAAs?

- a. _____ Annually
- b. _____ Semi-annually
- c. _____ Quarterly
- d. _____ Monthly
- e. _____ Other, (*Specify time period*) _____
- f. _____ Don't Know (*Check if applicable*)

17. What were the beginning and ending dates of the last complete cycle of assessments?

- a. Beginning Date - _____
- b. Ending Date - _____

18. During your last review cycle, were all AAAs assessed?

- a. _____ Yes
- b. _____ No, (*If No*) (1) How many AAAs were assessed?

(a) _____ of _____
Number Assessed Total # AAAs

(b) _____ Don't Know (*Check if applicable*)

(2) Why weren't all of the AAAs assessed?

(a) _____

(b) _____ Don't Know (*Check if applicable*)

c. _____ Don't Know (*Check if applicable*)

19. What other processes are in place to monitor the performance of AAAs? (*Check all applicable responses*)

- a. _____ On-site review
- b. _____ Desk review of "self-assessment" form
- c. _____ Telephone interviews
- d. _____ Other (*Specify*)

(1) _____

(2) _____

(3) _____

20. Provide a brief description of how each process is used to monitor the performance of AAAs. (*Description should be provided for each applicable response provided in question 19*)

21. What were the most common deficiencies revealed in the last cycle of assessments of the Area Agencies?

- a. _____
- b. _____
- c. _____
- d. _____
- e. _____
- f. _____ Don't Know (*Check if applicable*)

22. Has the State Agency implemented procedures to ensure that issues or concerns raised during an assessment of an Area Agency on Aging are resolved?

a. _____ Yes (*If yes*), Please describe: _____

b. _____ No (*If no*), Why not? _____

c. _____ Don't Know (*Check if applicable*)

23. What percentage of your AAAs conducted the annual evaluation of activities carried out under the Area Plan? [Sec. 306(a)(6)(A)]

_____ (*Indicate percentage*)

24. What percentage of your AAAs conducted the public hearings on activities carried out under the Area Plan? [Sec. 306(a)(6)(A)]

_____ (*Indicate percentage*)

25. What percentage of your AAAs conducted the annual evaluation of the effectiveness of outreach (to identify and inform individuals eligible for assistance, with special emphasis on the rural elderly; those of greatest economic or social need; and older individuals with severe disabilities)? [Sec. 306(a)(6)(A)]

_____ (*Indicate percentage*)

26. Have you analyzed the: *(Fill-in the remainder of the question with a, b, and c. Indicate response for each)*

a. evaluation of activities?

(1) _____ Yes *(If Yes)*, What are your primary observations based on the analysis?

(2) _____ No

(3) _____ Don't Know *(Check if applicable)*

b. results of public hearings?

(1) _____ Yes *(If Yes)*, What are your primary observations based on the analysis?

(2) _____ No

(3) _____ Don't Know *(Check if applicable)*

c. evaluation of outreach?

(1) _____ Yes *(If Yes)*, What are your primary observations based on the analysis?

(2) _____ No

(3) _____ Don't Know *(Check if applicable)*

27. What technical assistance and training has the State Agency provided to AAAs in order to address any identified deficiencies?

If technical assistance or training has been provided, indicate on the following table the type of technical assistance or training provided, how the need was determined, and how the technical assistance or training was provided, (e.g., memoranda, consultants, telephone calls, on-site visits, etc.).

	TECHNICAL ASSISTANCE OR TRAINING PROVIDED	HOW NEED FOR TECHNICAL ASSISTANCE OR TRAINING DETERMINED	HOW TECHNICAL ASSISTANCE OR TRAINING PROVIDED
(a)			
(b)			
(c)			
(d)			
(e)			
(f)			
(g)			
(h)			

(i) _____ Don't Know (*Check if applicable*)

28. Do the AAAs have any unmet training or technical assistance needs related to their stewardship activities?

a. _____ Yes (*If yes*), Please describe:

b. _____ No

c. _____ Don't Know (*Check if applicable*)

29. Does the State Agency have any unmet training or technical assistance needs related to stewardship activities?

a. Yes (*If yes*), Please describe:

b. No

c. Don't Know (*Check if applicable*)

30. *The preselected sample of 10 Area Agencies on Aging were identified prior to the on-site visit. This sample is to be used throughout the compliance review process for all five areas, the first compliance review being Stewardship.*

For the sample AAAs, obtain the most current Area Plan. Review each Area Plan and determine the extent to which the plan addresses the statutory and regulatory criteria identified in Attachment A. Record your responses on the following table using these codes:

- Y (Yes) = Total Compliance with Criteria*
- P (Partial) = Partial Compliance with Criteria*
- N (No) = Not in Compliance with Criteria*
- NSC = No State Criteria (State Agency does not use this Federal criteria - identified through in-house review of State Agency's area plan format)*
- O = Other Finding (provide explanation and indicate by report number and criteria number in the Comments section following the table)*

AAA Name										
Sample Number	1	2	3	4	5	6	7	8	9	10
Criteria										
a1										
a2										
b										

AAA Name										
Sample Number	1	2	3	4	5	6	7	8	9	10
c										
d1										
d2										
d3										
d4										
d5										
e1										
e2										
e3										
e4										
e5										
e6										
e7										
e8										
e9										
e10										

AAA Name										
Sample Number	1	2	3	4	5	6	7	8	9	10
e11										
e12										
e13										
e14										
e15										
e16										
e17										
e18										
f										
g										

COMMENTS:

31. For the sample AAAs, obtain the most currently completed annual cycle of State Agency assessment instruments and corresponding assessment reports (if any). Review the assessment findings and determine the extent to which each of the sample AAAs were in compliance with each of the criteria identified in Attachment A. Record your responses on the following table using these codes:

- Y (Yes)* = Total Compliance with Criteria
- P (Partial)* = Partial Compliance with Criteria
- N (No)* = Not in Compliance with Criteria
- NSC* = No State Criteria (State Agency does not assess this Federal criteria - identified through in-house review of State Agency's assessment tool and related materials)
- CMSL* = Criteria met at State level
- O* = Other Finding (provide explanation and indicate by report number and criteria number in the Comments section following the table)

AAA Name										
Sample Number	1	2	3	4	5	6	7	8	9	10
Criteria										
a1										
b										
c										
d1										
d2										
d3										
d5										
e1										

AAA Name										
Sample Number	1	2	3	4	5	6	7	8	9	10
e2										
e3										
e4										
e5										
e6										
e7										
e8										
e9										
e10										
e11										
e12										
e13										
e14										
e15										
e16										
e17										

AAA Name										
Sample Number	1	2	3	4	5	6	7	8	9	10
e18										
f										
g										

COMMENTS:

[INTERVIEW COMPLETED]