



October 15, 2021

Mark Beckley, Acting Director
California Department of Aging
1300 National Drive, Suite 200
Sacramento, CA 95834

RE: CWDA Comments on the Hubs and Spokes Initiative

Dear Acting Director Beckley:

The County Welfare Directors Association (CWDA) is pleased to have the opportunity to provide comments in response to the California Department of Aging (CDA) Hubs and Spokes Initiative. CWDA applauds the Administration's work to begin implementation of the recently adopted Master Plan for Aging, as CWDA supports the vision and values identified in this plan. Given the expected growth in our older adults population, we agree that it is critical take the necessary steps now to build the foundation that will allow California's public and private agencies to strengthen services for older adults, their families and caregivers.

CWDA continues to embrace and encourage adoption of policies and programs that promote a person-centered approach towards building consumer choice, equity, inclusion and accessibility; dignity, innovation and evidence-informed practices; and partnerships among federal, state and local agencies including the philanthropy and private sectors. County human services agencies, including our front-line social workers and our many other county staff, strive on a daily basis to deliver services in alignment with these core values.

As we understand it, the purpose of the "Hubs and Spokes Initiative" is to address two recommendations included in the Master Plan on Aging to build an age- and disability-friendly state (recommendations 98 and 101):

1. Build out No Wrong Door approach statewide for public information and assistance on aging and disability services, with the goal of providing free and easy access to information and services for all Californians.
2. Revisit California's Area Agency on Aging (AAA) local leadership structures to meet the growing and changing needs and advance equity.

With respect to the first recommendation, CWDA supports building on the existing Aging and Disability Resource Connections (ADRC) network as a mechanism to build No Wrong Door approaches statewide, and we applaud recent investments by the Legislature and Administration to increase funding to ADRCs. The ADRC model serves as a gateway to information about, and access to, Long-Term Care Services and Supports for any interested individual, including programs administered by county human service

agencies. The ADRCs promote collaboration through the core partner agencies – Area Agencies on Aging and Independent Living Centers (ILCs). Several county human service agencies also directly operate an ADRC as the local AAA, and all counties see the value of this No Wrong Door approach. We encourage expansion statewide, continued support to this model and collaboration with county human service agencies. We also agree that for the ADRC model of “No Wrong Door” to be effective, there must be a broad array of services available—from prevention, early intervention to more intensive care and support—and leveraging county human service programs can support this goal.

With respect to CDA Recommendation #2 and changing the AAA local leadership structures, we appreciate the consideration of AAAs’ role in meeting the goals of the Master Plan for Aging. We believe AAA’s will play a central role in building connections to a robust array of services and supports for older adults. CDA proposes several scenarios for restructuring the AAA Public Service Areas (PSA), ranging from the current 33 PSA structure, to a 58-county PSA structure, to a hybrid model. CWDA at this time does not endorse any specific model. Rather, we urge CDA to first engage stakeholders in additional discussions of the current challenges and opportunities to strengthen the existing AAA structure and implement solutions that bolster AAAs’ ability to serve older adults in alignment with the Master Plan for Aging. Engaging stakeholders provides the highest potential for collaboration in developing a new model and affords the ability to address existing barriers.

We believe that it is critical to first identify and address the current challenges in the administration of AAA programs before making any decisions for restructuring. Until that can be done, it will be difficult if not impossible to determine how best to support the Hubs and Spokes model and decide upon the appropriate roles of AAAs or other local entities in this model. For example, in our discussions with county agencies that administer AAA programs, challenges raised include the difficulty of managing multiple (and almost continuous) contracting processes for multiple AAA programs and services, which require considerable staff time and resources to manage. In some counties, the county human service agency has the infrastructure and staff resources to help manage this work, but only by leveraging other county resources. Historic and chronic underfunding of the administration of the AAA programs, coupled with the siloed nature of the services, was a recurrent theme in our conversations with counties – both those that administer AAA and those that do not. Until these and other challenges can be addressed, determining the best local structure will be impeded.

As the barriers are addressed, CWDA encourages CDA to work to establish mechanisms for enabling local agencies and stakeholders — including county boards of supervisors, county human service agencies, Area Agency on Aging providers, and ILCs — to engage in transparent processes for determining how best to deliver services to older adults and persons with disabilities, in the best interests of the individuals and families served. We support creating mechanisms to allow for changes in PSA and/or administrative entity designations, when driven through a robust public stakeholder input process and aligning with “build back better” services and service access for older adults. Changes in PSA or administrative entity designations could be permitted on a continuous basis and can be based on set cycles (i.e. every 3-5 years) once AAA funding and other administrative barriers are resolved. The process should be supported by CDA and guided by an outcomes-focused approach aligned with the goals of the Master Plan on Aging.

In addition, CWDA supports the California Association of Area Agencies on Aging (C4A) recommendation in its September 3, 2021 letter to CDA for a “systems analysis of design elements as part of a strategic change process to support higher quality and more effective service delivery.” An independent analysis of the design elements that promote effective service delivery can inform future investments and/or inform discussions for strengthening AAA programs statewide.

For additional considerations and recommendations, please see Attachment A.

Thank you for this opportunity to comment and we look forward to continued conversations regarding this proposal with your Department, our C4A partners and other key aging services stakeholders. Together we can strengthen existing programs and partnerships while also lifting up innovative ideas and best practices that will ultimately result in a easily accessible continuum of services that allows older adults and persons with disabilities to live with dignity.

Sincerely,

A handwritten signature in black ink that reads "Cathy Senderling-McDonald". The signature is written in a cursive, flowing style.

Cathy Senderling-McDonald
CWDA Executive Director

C: Kim McCoy Wade, Senior Advisor to the Governor on Aging, Disability and Alzheimer’s

Enclosure: Attachment A