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**National Association of  
Area Agencies on Aging**

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June 29, 2021

The Honorable Patty Murray, Chair  
The Honorable Roy Blunt, Ranking Member  
Senate Appropriations Subcommittee on Labor/HHS/Education  
Washington, DC 20510

The Honorable Rosa DeLauro, Chair  
The Honorable Tom Cole, Ranking Member  
House Appropriations Subcommittee on Labor/HHS/Education  
Washington, DC 20515

Dear Chairwoman Murray, Ranking Member Blunt, Chairwoman  
DeLauro and Ranking Member Cole:

The National Association of Area Agencies on Aging (n4a), which represents the country's 622 Area Agencies on Aging (AAAs) and advocates for the more than 260 Title VI Native American aging programs, would like to build on our [March 25](#) and [April 26](#) letters to the Committee and express our support for critically important recommendations in President Biden's FY 2022 budget. Specifically, we support increases to the Older Americans Act (OAA) programs and services funded via Title III B Supportive Services, Title III E National Family Caregiver Support Program and Title VI Native American Aging Programs. **This letter also addresses our recommendations on the flexibility of OAA funding and an urgent situation on OAA match requirements for the American Rescue Plan.**

The OAA is the cornerstone of the nation's non-Medicaid home and community-based services (HCBS) system, providing older adults with much-needed supports, including in-home care, congregate and home-delivered meals, adult day care, information and referral assistance, case management, transportation, legal services and caregiver support/respite. Investments included in the Biden Administration's budget request in these vital OAA programs support the health of older adults with these services and save Medicare—and the nation—money in the short and long term.

The President's FY 2022 recommended increases to OAA are particularly welcomed by n4a as our members from all corners of the

country have told us that these are the programs most in need of additional resources to meet the continued and growing needs of older adults and caregivers. The Biden Administration's budget request builds upon the Aging Network's successful pandemic response, which was made possible by substantial supplemental funding provided by Congress. Long-term and widespread social isolation and loneliness among older adults; racial, economic, and geographic inequities; a caregiving workforce in crisis; and, until the passage of COVID-19-relief legislation, largely inadequately resourced systems of care have all contributed to the pandemic's devastating consequences for older Americans—consequences that we and our members expect to remain a threat even as the pandemic ebbs.

**As you consider funding levels for FY 2022, we urge you consider the following priorities identified by our members' experience in directly supporting older adults and caregivers and aligned with President Biden's FY 2022 budget priorities.**

**OAA Title III B Supportive Services programs.** The most chronically underfunded title of OAA until this year—and a top appropriations priority for n4a—III B received a **proposed total of \$551 million for FY 2022** in President Biden's budget. This increase reflects the significant investment OAA advocates have championed for more than a decade and aligns with the Administration's priority to support older adults and people with disabilities by providing services that enable them to remain in their homes and communities. **n4a's request remains \$785 million**, a doubling of current appropriations levels, for this most flexible and needed of OAA programs that provides a wide range of services to older adults, including in-home care, case management, information and referral, transportation, legal services and much more.

**Title III E National Family Caregiver Support Program.** President Biden proposed a 32 percent increase over this year's funding levels to allow for the continuation of critical relief to family and other caregivers who support individuals aging at home, which is in line with n4a's request of at least a 50 percent increase (to \$283.4 million). We have also supported congressional and coalition calls to double III E to \$377.8 million in FY 2022 to respond to the current and unmet needs of family and other informal caregivers.

**Title VI Grants for Native American Aging Programs.** The Biden Administration has committed to strengthening support for Native American tribes specifically around reliable, affordable, quality health care and addressing long-standing disparities impacting the most vulnerable populations within Indian Country. For OAA Title VI Native American aging programs, the President's budget mirrors n4a's request to double Part A to \$70.4 million so that tribes can provide nutrition and supportive services to some of America's most vulnerable older adults. Part C, the caregiver program within Title VI, would see a 45 percent increase (to \$16 million) in the President's budget; n4a has requested \$21.6 million, which is a doubling of the current level. Please see [our April 26 joint letter with the National Indian Council on Aging](#) for more details on our Title VI request.

**Title III C Nutrition Programs.** n4a was pleased to see the President's recommendation of

an overall 41 percent increase to the OAA's nutrition program. The budget proposal also rebalances nutrition funding to better reflect the pandemic-era needs of older adults and caregivers, *decreasing* congregate meals (C1) funding from \$515 million in FY 2021 to \$467 million while *increasing* home-delivered meals (C2) funding from \$276 million to \$703 million. This rebalancing recommendation is a more modest approach to solving the problem, but it should be noted that n4a has long supported an expansion of the 40 percent transfer authority within the Act between C1 and C2 to 100 percent *within that title alone*. Congress provided that flexibility to states and Area Agencies on Aging on a temporary basis during the pandemic, which played a significant role in the Aging Network's success in meeting the nutritional needs of older adults during the pandemic. Given unabating numbers of clients our members are seeing, this flexibility must continue to meet today's needs. n4a would like to work with appropriators on the most sensible approach to continued flexibility within the nutrition subtitle of the OAA.

**OAA Flexibility.** Speaking of flexibility, the President's budget also asks for a one-year continuation of the 100 percent flexibility in the Act provided via the states' Major Disaster Declarations (MDD). As those MDDs rapidly begin to expire, it is reasonable for Congress to provide some continuity as the Aging Network (along with the nation) emerge from the pandemic, readjust programs and services as in-person activities resume, and build upon pandemic-era innovation to move aging services into a new era.

However, there are important reasons why Congress created separate funding streams for key titles and subtitles of the OAA (e.g., III B, III C, III D), such as accountability, prioritization and setting national standards for the suite of programs and services the Aging Network uses to deliver person-centered care. **While 100 flexibility was essential to address the emergencies that COVID-19 created, longer-term use of that extreme collapsing of separate funding streams poses a serious risk to a unique and key aspect of the Act: local decision-making.**

n4a's Area Agency on Aging members were added to the Act in 1973 in order to build out a regional and local development, planning and delivery system for aging services that would better meet the mission of the legislation and older adults' needs. It's this local leadership that separates this Act from many others that are wholly state-controlled, and it's critical that the Act ensures that healthy balance of state decision-making and oversight *as well as* Area Agency on Aging decision-making and oversight. Too often, states attempt to make spending and policy determinations that should be left to the Act's local leaders: AAAs specifically but also the community-based service providers in the AAA's local network that also deliver a wide range of OAA services. The area plans required by the Act are intended to inform the state plans, not the other way around, yet this does not always happen, as states are used to working top-down.

**To preserve one of the most important and successful aspects of the OAA delivery system, any conversations about total flexibility need to take into consideration the essential role of AAAs in creating the state and local options for older adults and their caregivers.** We want to ease the Network's burdens as we make this transition to post-pandemic service delivery—yet not inadvertently create a federal or state block grant with

no local decision-making, flexibility or input. While not opposed to the Biden Administration's attempt to ease this transition within FY 2022 funding, we urge caution regarding longer-term policies and hope that a larger conversation can be had with Congress and the Aging Network to determine the best path forward.

**ARPA Match Requirements.** An additional, urgent issue for discussion as you craft your respective spending bills is relief from the matching requirement that was, we believe inadvertently, not waived in the American Rescue Plan Act for the OAA. Grateful as we are for Congress' leadership in providing these significant funds to meet pandemic-related and ongoing needs, the fact that state and local match (25 percent in total) wasn't waived as it was in earlier COVID-relief packages is proving to be a barrier for states and AAAs in implementation. We are seeking relief from this match for the ARPA funds only at this time and would welcome other ideas from your committees on rectifying this situation so that the vital investment can most swiftly and effectively be put to use on behalf of older adults and caregivers in communities across the country.

Thank you for your consideration of our recommendations. If you need to revisit n4a's priorities and funding requests, please review our [March 25](#) (comprehensive) or [April 26](#) (Title VI request) letters or visit [n4a's 2021 Policy Priorities](#) for additional information. Should you have any questions, please feel free to contact [me](#) or [n4a's policy staff](#).

Sincerely,



Sandy Markwood  
Chief Executive Officer

cc:

Chairman Patrick Leahy, Senate Appropriations Committee  
Ranking Member Richard Shelby, Senate Appropriations Committee  
Chairwoman Rosa DeLauro, House Appropriations Committee  
Ranking Member Kay Granger, House Appropriations Committee  
Members of the House and Senate Labor/HHS/Education Subcommittees