

Calhoun County Council on Aging

P.O. BOX 212

St. Matthews, South Carolina 29135

TELEPHONE: 874-1270

Mr. Tony Kester
Director
LGOA
1301 Gervais Street
Suite 350
Columbia, SC 29201

Dear Mr. Kester:

I would like to thank you for this opportunity to address my questions and concerns regarding the updated Policy and Procedures Manual. I especially want to thank you and your staff for the changes that were made in the revised manual dated June 28, 2013.

The new definition of "homebound" is much better but I think it should include impairments of IADL's since being homebound is a requirement of receiving a home delivered meal. There are elderly that are not totally homebound that cannot stand and prepare a balanced meal and are not mobile enough to attend the congregate meal program. These individuals need a home delivered meal to remain in their home.

Also this revised definition has not been updated in AIM and until AIM is updated the scoring for clients will be biased. NEED TO MAKE SURE ALL CHANGES MADE TO THE MANUAL ARE REFLECTED IN AIM AND ON THE ASSESSMENT FORM.

Other biases in AIM's scoring:

- Too much weight on ADL's as compared to IADL's. The definition may have changed but the weight on these questions place those that meet nursing home level of care at a higher priority. Many of the elderly in this category or seeking placement or have caregivers in the home to help them. The purpose of the OAA is to prevent clients from reaching nursing home level of care for as long as possible.
- Too much weight on income. OAA does not allow means testing. However, the policy manual states that a client must provide their income and other information in order to receive service. This is means testing. Also reducing ones score because they refuse to give income information is means testing. Actually giving any score for a certain level of income is means testing. The OAA does require targeting clients who are socially and economically needed, minority and non-English speaking but there is difference between *targeting a*

population and only serving a certain population. Targeting of low income could be gathered from the questions that ask if they have missed a mortgage payment, utility payment, or gone without food or medicine because they could not afford it. These questions are not scored therefore it would not be means testing.

- The question that troubles me the most and the number of points associated with it, is: *Have you ever been denied a service based on where you live?* This could be anything, such as cable or internet and could have been denied 10 or so years ago but not now. Not sure the validity of this question, but if it is due to targeting rural this is already being scored based on zip code.
- The weight the nutrition score has in assessing all clients. One's nutrition score should not be weighted the same for home care and transportation as nutrition services. It should not be used at all for eligibility for group dining as the only requirement of OAA funds is that they are 60 years of age or older. Having served as Director of a service provider agency for 25 years, my experience is that the program helps those that are socially needed the most. Many of our client's would tell you that coming to the senior center gives them purpose and a reason to get up and get dressed. These clients receive the added benefit of nutrition while attending the senior center.

I am concerned about using the Census Bureau's definition of rural. All areas of a small county should be counted rural not just the unincorporated area. Using zip code does not work for small counties because most of the small counties have just one zip code.

How does the requirement of entering meal service data once a week improve service quality? This requirement creates a lot of additional work and impairs our system of checks and balances and reconciliation of meals ordered, delivered and served. I think monthly is sufficient.

A major concern with separating the duties of client assessment and selection is the cost associated with assessing clients and not having any reimbursement until service is provided to a client. Your manual states to include all this in your unit cost but most providers are not reimbursed the true unit cost. Actually this year my reimbursement rate for every service provided with OAA funds has been reduced from last fiscal year's reimbursement; and costs have increased some of which are the result of the changes in this manual.

Another issue I have with AIM is that we no longer have any rights to access. It does not allow us access or the ability to allow access to our employees who have to work in AIM for the agency to meet compliance requirements and receive reimbursement. All requests for access or to block access have to be requested from LGOA and this delays data entry etc. I understand that controls need to be in place but I think Director's of provider agency's are capable of monitoring access for our employees. Also, we should be able to correct simple data input errors. By not allowing corrections for data entry error information provided does not accurately reflect who we serve.

Section 603 – Eligibility is for those “functionally impaired” – this definition needs to be expanded to include IADL's or at least should be the same as that for III C-2 meals. It is ok to

have targets such as 75 or older etc. but should not be limited only to those criteria. Maybe a percentage of clients served should meet the specific criteria. This would give us flexibility to serve all those in need.

The Policy and Procedures manual makes reference of QA standards. Are these the current standards effective January 2009 or, are they included in this manual and not a separate document? When they are revised will you follow the procedure in this manual that they be revised with input from providers and give a period for comment before implementation?

In the future when updates are made to the manual could we be notified by email? It was several days before I know there were changes and spent time and resources implementing some requirements that we deleted with the revision.

There are several inconsistencies throughout the manual some of which SCACAD will present to you as a group.

Again, Thank you for this opportunity to have my questions and concerns addressed and I look forward to meeting with you and your staff on Tuesday July 23, 2013 at 2:00.

Sincerely,

A handwritten signature in cursive script that reads "Jenny Swofford". The signature is written in black ink and is positioned above the printed name and title.

Jenny Swofford
Executive Director