



SENIOR AND LONG-TERM CARE, AGING SERVICES BUREAU NP22001-Aging Services Assessment and Review Program Officer 1.0 PB Request

Background:

The Senior and Long-Term Care, Aging Services Bureau serves as the State Unit on Aging (SUA) for administering Older Americans Act (OAA) funds. These funds are distributed through required contracts with Montana's nine Area Agencies on Aging (AAAs). The Administration for Community Living (ACL), part of the U.S. Department of Health and Human Services, oversees the SUA's compliance with the Act and its programs, which are delivered in partnership with the AAAs.

Area Agencies on Aging

AAAs were added to the Act in 1973 to help vulnerable older adults live independently and with dignity in their homes and communities. The OAA mandates that AAAs use the flexibility provided in the law to ensure local needs and preferences are taken into consideration, resulting in a service-delivery system tailored to the community.

Current Impact:

Today, AAAs coordinate a complex local service-delivery system that serves millions of older adults and caregivers nationwide, providing access to critical home and community-based services. The OAA authorizes a wide array of service programs through a national network of 56 SUAs, 618 AAAs, nearly 20,000 service providers, 281 tribal organizations, and one Native Hawaiian organization representing 400 tribes.

In Montana, the aging network consists of the SUA, nine AAAs, approximately 163 councils on aging and senior centers, as well as many other home health agencies and not-for-profit organizations. Collectively, this network results in a system of coordinated efforts to provide critical supports, assisting people in aging successfully at home and in their communities.

Program Officer Responsibilities:

This position is needed to develop, implement, and maintain compliance for programs offered with OAA funding. Both program and fiscal monitoring are required, along with providing technical assistance and corrective action plans as needed. Monitoring is required for the following funding sources and programs:

- Title III B – Supportive Services
- Title III C-I and C-II – Nutrition Services
- Title III D – Evidence-Based Programs
- Title III E – Caregiver Supports
- Title VII – Elder Abuse Prevention



The process includes annual desk reviews for all nine AAAs, focusing on at least two programs. On-site reviews will follow, determined by the desk-review results and assessed risk levels. This work will involve contributing to policies, procedures, and contracts while ensuring compliance with the new OAA regulations. The role may expand as the ACL provides further compliance guidance.

Compliance Requirements:

New federal regulations, effective March 16, 2024, mandate state compliance by Sept. 30, 2025. States may submit a corrective action plan if additional time is needed to address non-compliance. The regulations require states to collaborate with their AAAs to develop and update new policies and procedures, aiming to strengthen existing frameworks.

Impact:

The updated OAA implementing regulations under [§45 CFR 1321](#), released in February 2024, clarify the roles and responsibilities of SUAs, AAAs, and providers of OAA-funded services:

- [§1321.1\(c\)\(3\)](#): SUAs are responsible for planning, policy development, administration, coordination, priority setting, monitoring, and evaluation of all State activities related to the OAA;
- [§1321.47 \(a\)\(3\)](#): SUAs must establish robust monitoring and oversight processes, including periodic reviews, to identify conflicts of interest in Title III programs; and
- [§1321.7](#): SUAs must maintain an adequate number of qualified staff to fulfill the prescribed functions, including monitoring, as defined by the rule.
- [§1321.9](#), [§1321.47](#): New regulations emphasize developing, implementing, and monitoring compliance with conflict-of-interest policies for contractors and subcontractors of the state. SUAs must also establish and enforce requirements for contracts and commercial relationships with AAAs.

With the expanded regulations, the program officer position is critical to addressing gaps within the agency and ensuring compliance with the new OAA regulations. Without this role, the Aging Services Bureau will continue to rely on the bureau chief and staff to field calls from contractors and subcontractors, to work with them on new federal laws and regulations to ensure compliance. These issues require prompt attention, mitigation, and the implementation of updated policies to prevent future occurrences.

Introducing this position will provide dedicated support to the AAAs and their subcontractors, ensuring compliance with federal and state requirements and the proper use of taxpayer dollars for OAA services.