



August 20, 2020

Representative Weston Newton  
Chairman, House Legislative Oversight Committee  
228 Blatt Bldg.  
Columbia, SC 29201

Dear Representative Newton,

On behalf of the South Carolina Association of Council on Aging Directors, we are grateful for the commitment of continuous improvement of the aging network as outlined in the Legislative Audit Council's June 2020 review of the South Carolina Department on Aging.

We applaud the restructuring of the SCDOA as a cabinet level agency and the early developments of reform under the capable leadership of the new director. We are committed to joining the SCDOA in providing high-quality services for South Carolina's growing aging population. As providers serving locally in counties across the state, we look forward to joining the process of improving the network as outlined by the report's recommendations.

The report outlines a thorough review of the agency, including its relationship with the Area Agencies on Aging through which we are contracted as local providers. Many of the recommendations will directly impact our service delivery models as the network renews its commitment for efficiency and accountability. We share this commitment and have reviewed the report carefully to join the movement of improvement. After reviewing the report, SCACAD would like to share our perspective and response to the report.

In Chapter Two the report recommendations on the funding structure will have significant impact on local service models. We concur that a thorough review of current population information, equitable allocation of resources, and improved budgeting processes are in the best of interest of the seniors in South Carolina. The LAC's recommendations and SCDOA's agreement with recommendations are to be applauded, however we strongly recommend that the local providers and impact to seniors in our communities be voiced and considered in these reforms. We lift the following three specific recommendations and responses for consideration:

- *Recommendation 10* outlines a change in the funding formula. Such changes must be made with consideration of equitable access to services statewide. Service delivery costs in rural areas and high density suburban and urban areas differ greatly. At the same time the high density areas often have greater population needs than those in less populated areas. **Response: Changes in the funding formula must include a nuanced review on the impact to seniors in the varying and diverse communities across the state.**

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- *Recommendation 15* encourages an analysis of service rates and the report lifts an example of a statewide unit rate for service. The current unit rate process is based on competitive bids to the meet extensive SCDOA service requirements. Local providers operate in a wide variety of local conditions and provide the most economical delivery of high-quality services. A move to a statewide unit rate may jeopardize some counties' abilities to provide services where operational costs are more expensive while at the same time may represent excessive rates in areas where operational execution costs are lower. The consideration of local operation costs in contract rates provides the best stewardship of tax payer dollars. **Response: The analysis of service costs should not include a flat unit rate for services but rather a range of acceptable rates based on the cost of local service delivery.**
- We share the desire to reduce and eliminate waiting lists as outlined in *Recommendation 17*. The report adequately acknowledges the challenges in this shared goal. However, the recommendation that direct provision of services by the SCDOA or AAA does not reflect the full utilization of the network's strengths to solve this problem. The local providers have decades of experience, possess active local presence in the communities where seniors live, and many have additional local resources that can address this issue. Additionally, as prior decisions made within the network have made clear, the three-tier system of SCDOA, AAA, and providers creates the highest degree of fidelity and compliance with federal standards. As the SCDOA develops plans to eliminate waiting lists it is in the best interest of seniors that local providers be included in the plan. **Response: To efficiently eliminate waitlists with fidelity, the inclusion of local providers to expand services should first be explored before the provision of services directly by the AAA or SCDOA.**

Chapter Three outlines recommendations to strengthen monitoring practices at the state, regional, and local levels. We agree with recommendations and responses that encourage a uniform monitoring system that will address the need for consistent and visible monitoring of aging services across the network. As these tools are being developed we encourage active dialogue with local providers to ensure these monitoring systems adequately reflect service delivery at the local level and the experiences of the seniors receiving services. **Response: Monitoring practices enacted to improve performance of aging services should reflect an accurate representation of service delivery from a full perspective of participants including senior citizens, local providers, AAAs, and the SCDOA.**

As the newly formed agency takes shape, we commit to being supportive partners in the organization and management practices outlined in Chapter Four. We support the reorganization and formulation of new practices. As revised practices relate to local providers we wish for an open, timely, and active dialogue with providers to ensure full understanding and commitment to follow new protocols. We anticipate this to include frequent communication of changes and the availability of training to ensure uniform delivery and monitoring of services statewide. We especially encourage immediate attention to *Recommendation 106* to fully replace the AIM system with a more modern and comprehensive data system. **Response: Development of revised organization and management practices should involve active communication with local providers to ensure uniform service delivery statewide to meet SCDOA objectives.**

At the conclusion of the report in Chapter Five regarding communication problems we applaud the SCDOA response to improve internal and external communication practices. We look forward to being an active part of the communication plans to communicate policy changes and important end-user information with the communities and seniors we serve. We agree with *Recommendation 115* to consider meetings of the AAA Directors and SCDOA as public meetings and believe that the accompanying transparency and accountability will be beneficial to the entire network. However, we believe that these public meetings should also be made open to the public to attend and include the opportunity on each agenda for public comment in order for senior citizens and local providers to provide feedback and consideration for items of concern in the aging community. **Response: As part of the improved and increased communication strategy, public meetings should be open to the public to attend and include the opportunity for public forum.**

It is our desire that the above responses to the Legislative Audit Council report be considered by all parties with an interest in improving South Carolina's service to our aging adults. The local service providers represented by the South Carolina Association of Council on Aging Directors are committed to continuously improving the services to the seniors we serve and we look forward to being an active participant in refining the aging network in our state.

We would like to thank members of the Legislative Audit Council for its time and energy in preparing the report and the staff of the Department on Aging for their dedication to the audit process. We commend the early work of Director Munn and look forward to her continued leadership. In light of the COVID-19 pandemic, we understand that disruptions have impacted and will continue to impact our shared work addressed in the audit. As we respond actively to the evolving emergency needs of our state's seniors, we remain committed to our long-term work of providing high-quality services to our states growing aging population in the years to come.

Respectfully submitted, on behalf of our members,



Lynn Stockman, President  
Newberry County Council on Aging, Executive Director  
1300 Hunt St, Newberry, SC 29108

cc: Legislative Audit Committee Director and Legislative Members  
Senate Family & Veterans Services Committee  
House Oversight Committee, Executive Subcommittee

## **South Carolina Association of Council on Aging Directors Membership**

*Aiken Area Council on Aging, Aiken*

*Allendale County Office on Aging, Allendale*

*Anderson Meals on Wheels, Anderson*

*Bamberg Council on Aging, Bamberg*

*Berkley Seniors, Inc., Berkley*

*Calhoun County Council on Aging, Calhoun*

*Carolina Lowcountry Red Cross, Charleston*

*Charleston Area Senior Citizens, Charleston*

*Chesterfield Council on Aging, Chesterfield*

*Clarendon County Council on Aging, Clarendon*

*Colleton County Council on Aging, Colleton*

*Darlington Council on Aging, Darlington*

*Dillion Council on Aging, Dillon*

*Dorchester Seniors Inc., Dorchester*

*Edgefield County Senior Citizens Council, Edgefield*

*Fairfield County Council on Aging, Fairfield*

*Senior Citizens Association, Florence*

*Generations Unlimited, Barnwell*

*Georgetown Council on Aging, Georgetown*

*Greenville Meals on Wheels, Greenville*

*Hampton Council on Aging, Hampton*

*Horry Council on Aging, Horry*

*Irmo/Chapin Recreation Commission, Lexington*

*Jasper Council on Aging, Jasper*

*Kershaw Council on Aging, Kershaw*

*Lancaster Council on Aging, Lancaster*

*Lee County Council on Aging, Lee*

*Lexington Recreation & Aging Commission, Lexington*

*Marion Council on Aging, Marion*

*Marlboro Council on Aging, Marlboro*

*McCormick Council on Aging, McCormick*

*Newberry Council on Aging, Newberry*

*Orangeburg Council on Aging, Orangeburg*

*Piedmont Agency on Aging,  
Greenwood, Abbeville, Laurens, & Saluda*

*Pickens County Meals on Wheels, Pickens*

*Senior Action, Inc., Greenville*

*Senior Centers of Cherokee County, Cherokee*

*Senior Centers of Spartanburg, Spartanburg*

*Senior Resources, Richland*

*Senior Services of Beaufort, Beaufort*

*Senior Services of Chester, Chester*

*Senior Solutions, Anderson, Oconee*

*South Santee Community Center, Charleston*

*Sumter Senior Services, Sumter*

*Union Council on Aging, Union*

*Vital Aging, Williamsburg*

*York County Council on Aging, York*