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October 15, 2021

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

**Re: Hubs and Spokes Network for Aging and Disabilities**

Dear Acting Director Beckley:

On behalf of the California State Association of Counties (CSAC), I write to share comments on the California Department of Aging (CDA) proposal for the Hubs and Spokes Network for Aging and Disabilities. California's Master Plan for Aging has created and propelled numerous opportunities to strengthen and enhance services for older adults. CDA's Hubs and Spokes Network proposal follows up on several of the initiatives outlined in the Master Plan and outlines a vision to revisit the local leadership structure for aging services in order to meet the growing demand and achieve equity. Counties have a pivotal role in delivering aging services and CSAC appreciates this opportunity to provide feedback.

CSAC supports the overall goal of the Hubs and Spokes Network to establish a foundation for delivering person-centered services for older adults. A key element of this proposal is that it would serve as a framework for local communities to adapt, which is critical as each county faces unique circumstances, resource availability, and geographic challenges in providing services to individuals and families. In addition, the Hubs and Spokes Network recognizes the valuable contributions of Area Agencies on Aging (AAA), County Adult Services, and community-based organizations and how all these entities must work closely together to best meet the diverse needs of this population.

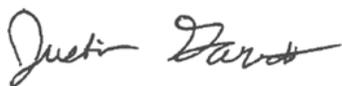
Regarding the AAA structure, counties must be able to maintain local decision-making authority and flexibility for delivering AAA services. The AAA administrative structure varies throughout the state, with both individual county and multi-county Planning and Service Areas (PSAs), and with AAA services administered by counties directly, by non-profit organizations, and through a joint powers agreement (JPA). Based on county feedback, it is clear that there are a variety of preferences by counties on how best to serve older adults in their community. Some counties want to keep their structure (including multi-county PSAs and non-profit administered structures), other counties want to separate and form an individual county PSA, and other counties want to change their administrative entity from a non-profit to instead be county administered. Given this diversity of approaches, CSAC has advocated throughout the Master Plan for Aging process that counties be given the flexibility and control to determine locally to either maintain or change their structure based on what works best in their community for administering and delivering aging services.

It is important to further define the process for how locally supported changes to the AAA structure could be made. For those counties that do want to change their structure, the timing of the Hubs and Spokes proposal presents a good opportunity to move forward, but that should not be the only opportunity to make changes. In addition, there are some limitations on a county's ability to make changes, particularly as it relates to counties that want to change only their administrative entity and not their PSA. While counties can change their administrative entity when modifying the makeup of the PSA, they should also have this ability even if not changing their PSA. There is merit in establishing a defined process and timeframe for making these decisions while also retaining the ability for counties to make changes on a continuous basis and to keep their current structure. The defined process could be established by having counties reaffirm or choose to change their PSA and administrative entity as a step in the Master Plan implementation process or by setting up a specific cycle for counties to do so every few years. CSAC looks forward to further discussion on what the process could look like and the role of county boards of supervisors.

Counties recognize that the aging population in California is growing significantly and that the demand for these services will continue to rise. The Hubs and Spokes Network proposal and the Master Plan overall provide a unique opportunity to reassess the resources that are provided for serving our state's aging population. Counties are supportive of investing additional funding into these services, committed to helping to determine the increased level of need, and look forward to partnering with the Administration and the Legislature to secure these resources.

CSAC appreciates the open and collaborative process being utilized by the California Department of Aging to gather feedback on this proposal. We look forward to continuing the partnership and active dialogue that has occurred throughout the Master Plan process. Should you or your staff have questions or need additional information, please do not hesitate to contact me at (916) 698-5751 or [jgarrett@counties.org](mailto:jgarrett@counties.org). Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Justin Garrett". The signature is written in a cursive, flowing style.

Justin Garrett  
Senior Legislative Representative

cc: Kim McCoy Wade, Senior Advisor on Aging, Disability, and Alzheimer's, Office of Governor Newsom