

Good morning. My name is Tracy Murray, and I am the Director of the Contra Costa County Aging & Adult Services Bureau. I am responsible for seven divisions, including the Area Agency on Aging, that support older adults and people with disabilities. I am speaking today to share my concern about the proposed regulatory changes related to the Revocation of AAA Designation status.

In the proposed text that is provided, CDA has stricken out in the first paragraph, section (a), the words “after attempts to resolve the problem, including the use of sanctions specified in Article 5, have been unsuccessful.” Striking these words from the opening paragraph effectively absolves CDA from utilizing an escalation process or corrective action plan in working through perceived issues with an Area Agency on Aging.

The Department continues by noting that it “shall revoke an AAA designation, in accordance with the provisions of this section, whenever it finds that” followed by six statements. The statements do not contain the word “and”, so it could be construed that revocation could occur if any of the factors are met. Regarding the factors, my concerns are as follows:

- (1): notes “*An AAA does not meet the requirement of this part;*” The statement is overly broad and ambiguous.
- (2): “*An Area Plan, update or amendment is not approved.*” CDA frequently delays approval of Area Plans by several months. As written, such a delay could be used to revoke an AAA’s designation.
- (4) notes “*Activities of the AAA are inconsistent with the statutory mission prescribed in the Act*”. This statement is overly broad and does not provide actionable guidance for AAA’s.
- (6) describes when the Department changes one or more planning & service designations. As written, this would effectively allow the Department to change the service area and revoke status without any due process described.

Section (b) allows the Department to revoke an AAA designation if a county submits a letter of intent to exercise its first right of refusal. This last statement does not appropriately consider the implications if an existing AAA, if not a county, is performing well.

I recognize and appreciate the Department’s commitment to enhancing the AAA network to serve older Californian’s, and I believe that the AAA’s, which include counties, Joint-Powers Agreements, and nonprofit organizations, seek to engage in meaningful dialogue about how to best proceed forward. I respectfully conclude by restating my concern about the proposed changes in regulation. I hope that the Department will consider all the feedback that it receives and revise its plans and documents accordingly. As a closing comment, I also want to note that finding the zoom links for this hearing, as well as others related to this effort has been challenging. I encourage CDA to prominently display in one section of their website all zoom links for the public hearings.

Best regards,  
Tracy Murray  
Director, Contra Costa County Aging & Adult Service