



advocacy | action | answers on aging

**National Association of  
Area Agencies on Aging**

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June 8, 2018

The Honorable Roy Blunt, Chair  
The Honorable Patty Murray, Ranking Member  
Senate Appropriations Subcommittee on Labor/HHS/Education  
Washington, DC 20510

The Honorable Tom Cole, Chair  
The Honorable Rosa DeLauro, Ranking Member  
House Appropriations Subcommittee on Labor/HHS/Education  
Washington, DC 20515

Dear Chairman Blunt, Ranking Member Murray, Chairman Cole and  
Ranking Member DeLauro:

We are reaching out to follow up on our April 2018 letter regarding the FY 2019 Labor/HHS/Education appropriations. The National Association of Area Agencies on Aging (n4a), which represents the country's 622 Area Agencies on Aging (AAAs) and is a voice in the nation's capital for the more than 250 Title VI Native American aging programs, is responding to the Trump Administration's FY 2019 Congressional Justification (CJ) for the Administration for Community Living (ACL), which was publicly released on May 31.

In addition to the concerning cuts included in the FY 2019 ACL budget request that were outlined in [our initial letter](#), we have strong objections to the language included in the CJ to allow states to disregard provisions in the Older Americans Act (OAA) Reauthorization of 2016 (P.L. 114-144) that limit the transfer authority between OAA Title III programs. According to the recently released CJ, the Administration proposes that lawmakers include language in the FY 2019 Labor-HHS funding bill to allow states to override the appropriations decisions reached by Congress by enabling them to move "nearly all" of the funding for OAA Title III programs and services around between subtitles as they see fit—without local input.<sup>i</sup>

There is already long-standing transfer authority in several subtitles of the Act to enable state *and local* flexibility while maintaining consistent availability of the Act's core programs and services across the country, which is vital to the health and well-being of the millions of older adults it serves.

The Administration's proposal provides increased flexibility for states to

transfer funds between OAA titles but does not engage local Area Agencies on Aging or providers in the transfer process. **As such, it contradicts the structure and history of the Act, which intentionally builds in local decision-making entities (Area Agencies on Aging) and processes (Area Plans) in order to ensure that local needs and preferences are reflected in programs and services delivered.** The proposal, if enacted, would also usurp the obligation of appropriators to appropriately direct federal resources.

As you work toward developing funding proposals for FY 2019, we hope you will reject the Administration's request to allow states such wide latitude to transfer funds between OAA Title III programs. We also echo our original request and hope that you will make every effort to, at a minimum, protect the increases for OAA and other aging programs that were provided in FY 2018—and continue to prioritize increases in FY 2019. Robust investments are essential to ensuring that these innovative, efficient and cost-effective programs enable older Americans to live at home and in their communities for as long as possible. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Sandy Markwood". The signature is written in black ink and is positioned below the word "Sincerely,".

Sandy Markwood  
Chief Executive Officer

cc:

Chairman Richard Shelby, Senate Appropriations Committee  
Ranking Minority Member Patrick Leahy, Senate Appropriations Committee  
Chairman Rodney Frelinghuysen, House Appropriations Committee  
Ranking Minority Member Nita Lowey, House Appropriations Committee  
Members of the House and Senate Labor/HHS/Education Subcommittees

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<sup>i</sup> Department of Health and Human Services, Fiscal Year 2019, Administration for Community Living, Justification of Estimates for Appropriations Committees, page 30, <https://www.acl.gov/sites/default/files/about-acl/2018-05/FY2019ACL-CJ3.pdf>