



Advocacy. Action. Answers on Aging.

March 12, 2010

Ron Sims, Deputy Secretary  
Office of Sustainable Housing and Communities  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street, SW, Room 10180  
Washington, DC 20410

**Attention Docket No. FR-5396-N-01**

Dear Deputy Secretary Sims:

The following comments by the National Association of Area Agencies on Aging (n4a) are in response to the advance notice and request for comments on the Sustainable Communities Planning Grant Program.

n4a is the leading voice on aging issues for Area Agencies on Aging (AAAs) and a champion for Title VI Native American aging programs. Through advocacy, training and technical assistance, we support the national network of 629 AAAs and 246 Title VI aging programs. We appreciate the opportunity to provide input through this advance notice as HUD seeks to maximize the benefits and impact of this exciting new planning grant program.

**General Comments**

n4a is very encouraged by the efforts of HUD and its partners at the DOT and EPA through the interagency Sustainable Communities Initiative. n4a fully supports the goals and objectives of the Initiative and believes these resources will go a long way to improving planning and coordination efforts that in turn lead to greater access to affordable, accessible housing, transportation options, and other essential supportive services to assist people to age successfully in their communities over their lifespans.

We believe the planning and coordination efforts developed through this grant program will only be cost-effective and efficient however, if they reflect our nation's new aging reality. It is clear policymakers' decisions on issues such as housing opportunities, transportation systems, and land use regulations directly impact older adults' ability to live successfully and productively at home and in their community. As such, **we encourage you to consider more thoroughly incorporating into the Initiative's six livability principles the need to plan across the**

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**National Association of Area Agencies on Aging**

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**lifespan** whether dealing with transportation choices, affordable housing, economic competitiveness, energy conservation, or investing in healthy, safe and walkable communities.

It is critical that we involve and assist local aging programs, such as AAAs, in broader community planning efforts so that they can better collaborate with state and local government agencies, nonprofit organizations and private sector partners to develop comprehensive strategies to promote livable communities that meet the needs of Americans over the lifespan. The first baby boomers will turn 65 in 2011, but most communities are still unprepared to handle the increased demands that this population shift will create.

According to the 2006 MetLife Foundation report cosponsored by n4a, *The Maturing of America – Getting Communities on Track for an Aging Population*, only 46 percent of American communities have even begun efforts to address the needs of the rapidly increasing aging population. This survey of 10,000 local governments found that “although many communities have some programs to address the needs of the older adults, few have undertaken a comprehensive assessment to make their communities ‘elder friendly’ or livable communities for all ages.”

### **Sustainable Communities Planning Grant Program**

n4a recommends that plans developed through the Sustainable Communities Planning Grant Program be required to include efforts on how the community agencies will invest in projects that are environmentally sustainable and promote livable communities for all ages. This includes community services and supports that serve people of all ages, as well as infrastructure improvements that meet the needs of people across their lifespan, including affordable and accessible housing, and transportation projects that take into account the needs of all users and enhance the availability and accessibility of mobility services.

#### **A. Proposed Funding Categories and Eligible Activities**

##### ***Category 1: Regional Plans for Sustainable Development***

First and foremost, **we encourage the Partnership to include aging readiness as a priority area in the performance metrics** it establishes for visioning and scenario planning exercises under this category of the grant program. This would entail appropriate data analysis, needs assessment, and outreach to experts to fully understand current and future demographics and the needs of the aging population in the area. We believe this would require the full and active involvement of AAAs in the region, which are uniquely positioned to have the information and expertise that will be critical to truly harmonize plans across multiple disciplines and support people over their lifespan.

In a separate but related issue, **we would like to bring to your attention the important role Title VI Native American aging programs play in their communities** in planning and directing services for older Native Americans. It is unclear from the notice whether tribal organizations will be eligible for planning funds under the grant program. We would appreciate clarification in the NOFA on this issue.

As stated previously, we believe plan elements should address planning for the lifespan, such as how the plan addresses the needs of older adults that want to age-in-place in their community and remain independent. For example, how do objectives and goals outlined in the plan impact non-drivers or public transportation—dependent populations such as older adults and persons with disabilities? Is there an adequate supply of affordable and accessible housing in the area within a quarter of a mile of public transportation? Are neighborhood streets and thoroughfares pedestrian-friendly?

The plan should also address how activities will be sustained on an ongoing basis. This is particularly an issue when considering the aging of communities with the number of Americans age 65 and older expected to reach 70 million by 2030, twice their number in 2000. At that point, older Americans will comprise nearly 20 percent of the U.S. population, representing one in every five Americans. In many communities across America, the percentage of the 65 and over population already far exceeds this projection. With life expectancy also rising, older adults will, collectively, live longer than their predecessors. With a high percentage of baby boomers expected to live beyond 85, forecasters expect a 60 percent surge in the 85 and over population between 2030 and 2040.<sup>1</sup>

We urge you provide for as open and inclusive a planning process as possible in your grant requirements. Specifically, it is important to consider the special needs of citizens in order to maximize participation and ensure input is broad enough and representative of all the community. To that end, we recommend that the grantees be required to hold public stakeholder meetings and community forums that are accessible to people from diverse backgrounds and interest areas. Special attention should be paid to holding these meetings at times and in venues that will be conducive to the participation of people across the lifespan.

We agree with the need to coordinate planning efforts under the grant with existing HUD, DOT and EPA required plans. It would be both inefficient and disjointed to not coordinate these efforts to the extent possible. Furthermore, we would encourage HUD to direct grantees to also coordinate planning efforts with other community initiatives, such as HHS-funded programs through Medicare, Medicaid and the Older Americans Act that have an essential role in promoting livable communities.

In fact, the 2006 amendments of the Older Americans Act authorized State Units on Aging and AAAs to include a community needs assessment on livable communities in the development of their state/area plans. Additionally, the Act includes provisions that require area plans to “include information detailing how [AAAs] will coordinate activities, and develop long-range emergency plans....” It is critical that the AAAs involved in these efforts be supported in their collaborative efforts and funded if they carry out work that is integral to the regional planning grants.

### ***Category 2: Detailed Execution of Plans and Programs***

We commend HUD for breaking out grant program funding under this category, which will allow regional coalitions to take steps to adopt their vision, implement strategies and follow through on their initial planning work. **The activities eligible for funding under this category should include:**

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<sup>1</sup> U.S. Census Bureau, National Population Projections, 2008.

- The development of mixed-use neighborhoods; enhanced pedestrian access and adoption of “Complete Streets” standards;
- Projects that increase transportation options and access to housing for people across the lifespan; Programs that promote healthy aging and disease prevention; and
- Initiatives that encourage the strong collaboration of participants and integration of transportation and development with other public services including services and supports for older adults and persons with disabilities.

Consistent with previous comments, we believe criteria for evaluating whether an adopted regional vision is in alignment with the livability principles must include how well the vision addresses and considers the needs of multiple population groups across the lifespan.

In reviewing this category of the grant program, **we have three questions on how the grant initiatives will be implemented** that we would appreciate clarification on in the NOFA.

- 1) How long is the grant period?
- 2) How will grantee activities be judged in terms of their sustainability beyond the grant period?
- 3) To what degree will the regional planning grant program be aligned with existing planning cycles at the local and regional level?

While the stated expectation is that at least 20 percent of overall costs of the project awards under the grant will include leveraged funding from other public, philanthropic and private sources including in-kind contributions, it should be noted that regional and local governments are having increasing difficulty in coming up with local matching requirements for federally funded programs due to the current budget climate and depleted revenues. Due to this fiscal reality, we suggest providing potential grantees with as much flexibility as possible as they seek to leverage funding and piece together financing arrangements. However, we believe those applicants that show a commitment to matching federal funding above the 20 percent threshold should be rewarded with additional points.

### ***Category 3: Implementation Incentives***

While resources under this program are limited, we support the notion of providing a portion of the appropriated funding through this category to innovative communities that have already adopted a regional vision and plans consistent with the livability principles, but lack the necessary resources in certain areas to bring them to fruition.

Evaluation criteria should include how consistent the regional vision and planned projects are with the needs of people across the lifespan, and whether they have established appropriate outcome measures to gauge success in meeting those needs. Have local and regional decision-makers developed set parameters for establishing new policies that are consistent with the livability principles under the Partnership? **Projects that are truly catalytic would demonstrate a capacity to:**

- Make institutional changes that spur greater coordination across agencies and jurisdictional boundaries;
- Bridge organizational barriers and funding silos; and

- Establish a multi-disciplinary approach to addressing community needs across the lifespan.

**The activities eligible for funding under this category should include tangible steps, such as:**

- Developing a plan to implement roadway design changes to make streets and highways safer for drivers and pedestrians;
- Forming a new interagency partnership among local transportation providers and aging services agencies to better serve the mobility needs of older adults and persons with disabilities in order to access community amenities; and
- Establishing cooperative agreements between local workforce boards and community service and job training programs to better utilize and take advantage of the talents of older workers and volunteers.

However, projects like these require a significant commitment of time, energy and human resources. For that reason, we would urge HUD to allow grantees funded to perform specific activities in this category sufficient time to conduct their activities—at least two or three years. Due to the nature of projects in this category and how federal funding would support local and regional implementation efforts, we would like to emphasize the potential for collecting “best practices” and related outcome data, and the benefits this information would have to other communities less far along in their planning efforts.

### **B. Entities Eligible for Funding**

n4a believes certain entities should be required partners in the multi-jurisdictional regions that would make up the consortiums including units of general local government. Specifically, **we urge HUD to require that AAAs be a required entity whether or not they fall under a council of governments or other governmental structure, or are private nonprofit organizations.** AAAs often work collaboratively with regional councils of governments, metropolitan planning organizations and their rural counterparts; however, this requirement would ensure that collaboration takes place and advancements are made as agencies work together under the grant program.

In order to ensure appropriate buy-in among the participants, the lead agency should be required to include letters of support from each of the consortium members that demonstrate a commitment to the livability principles as well as the goals and objectives of the grant proposal. Additionally, upon being awarded a grant the lead agency should be required to establish memorandums of understanding with each of the partner groups on their specific roles and responsibilities.

### **C. Selection Criteria**

**A needs assessment should be required as part of the application submission and required data elements should include:**

- The degree to which the proposal addresses needs across the lifespan;
- Current demographics and estimates on the growth of the aging population including members of the baby boomer generation that will reach retirement over the course of the

- next three decades, and how these population changes are likely to have an impact directly or indirectly on the communities in the region; and
- What factors are likely to promote or deter the ability of citizens to age-in-place, and remain independent in their own homes and communities for as long as possible.

Thank you for the opportunity to comment. Please do not hesitate to contact K.J. Hertz, Associate Director of Public Policy and Legislative Affairs, at 202.872.0888 if we can be of any assistance.

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: Shelley R. Poticha, Director, Office of Sustainable Housing and Communities