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October 15, 2021

Mark Beckley
Interim Director
California Department of Aging
2880 Gateway Oaks, Suite 200
Sacramento, CA 95833

RE: Hubs & Spokes Recommendations

Dear Mr. Beckley:

The California Foundation for Independent Living Centers (CFILC) represents 24 Independent Living Centers across the state that provide programs and services for over 100,000 people with disabilities each year. CFILC members have reviewed the California Department of Aging (CDA) Hubs & Spokes initiative and supports the model with the recommendations articulated in this letter.

As stated on CDA's website, the vision of Hubs & Spokes is to establish a statewide "foundation and framework" for aging and adult services within each county to deliver person centered, equity focused, and data driven programs and services that lead to outcomes. CFILC understands this initiative is in alignment with what the Master Plan on Aging set out to accomplish and the Older Californians Act is the vehicle to move the process forward.

However, CFILC believes this initiative should not compete with what has been created through Aging and Disability Resource Centers (ADRCs), Area Agencies on Aging (AAAs) and Independent Living Centers (ILCs). The Hubs & Spokes initiative must instead serve as the next step in expanding ADRCs in becoming Hubs & Spokes No Wrong Door systems that are inclusive and grounded in aging and disability equity.

CFILC is concerned that disability groups, and specifically the Department of Rehabilitation (DOR) and ILCs, were not invited to the table that led CDA to hosting Hubs & Spokes Town Hall events. The ILCs serve the cross-disability population and are established core partners with AAAs as the ADRCs, which currently serve as the No Wrong Door System within California.

Four of our ILCs currently serve as designated or emerging fiscal entities of their local ADRC. As we continue to expand ADRC's No Wrong Door Systems across the state, CFILC wants to ensure the same level of fiscal responsibility is an option for ILCs as core partners moving forward. CFILC believes a Hubs & Spokes model must be led by a Hub that includes the AAA, ILC and ADRC (where they exist and where they need to be expanded). The model should be geographically based and

inclusive of programs and services needed by local community members to live and thrive independently.

In partnership and through the ADRC, AAAs and ILCs will transform service navigation and access as the Hub to LTSS for all Californians with the goal of improving the social determinants of health for all individuals regardless of disability or age. The organizational leadership of the Hub must include disabled individuals with lived experience, as well as older adults and service providers with relevant expertise.

As the state works to create quality measures and develop a training curriculum that ensures programs and services are provided from a person-centered approach with a focus on equity and service coordination, CFILC recommends such efforts are done in coordination with Department of Rehabilitation, ILCs and AAAs – stakeholders who have the expertise and lived experience needed to assist in developing quality approaches that can serve as a national model.

Additional Recommendations:

1. Existing ADRCs or AAAs in partnership with the ILCs shall co-lead and be the Hubs of the proposed model.
2. There is high value in developing a statewide, multilingual accessible website to assist in communicating what “One Door” is, how to apply for services, and serve as the directory for geographically based local LTSS Spokes kept current by the Hub. The website shall include a built-in consumer referral system for individuals needing to be connected digitally to their local Hub for an intake.
3. A statewide ADRC phone number shall be established through the Public Utility Commission operating similarly to the 211, 411 or 711 systems, but specifically providing consistent and updated LTSS information and referrals to all Hubs and Spokes 24 hours a day, 7 days a week. The system will be uniform and structured so a caller from one county can find the same services in any county within the state.
4. In partnership with the ADRC Hubs, the state should launch a multi-year Hubs & Spokes LTSS public information marketing campaign to educate Californians on how to connect with their local “One Door” for LTSS.
5. It is important the state assess 33 Area Agencies on Aging and 28 Independent Living Centers to determine service gaps and work with the organizations to build their capacity and develop strategies to create programs and services needed in the community but are also in alignment with other “One Door” systems across the state.
6. Develop and implement program standards and trainings in collaboration with DOR, ILCs and AAAs on the four core ADRC services; (Enhanced Information & Referral/Assistance, Options Counseling, Short-Term Service Coordination and Transition services).
7. Each local ADRC is to provide person-centered, culturally competent information and assistance to older adults, people with disabilities and caregivers across all income levels, with appropriate language services led by individuals with disabilities that have lived experience.
8. All Information & Assistance and Referral (I&A/R) practices should be person-centered and based on individuals’ needs and preferences.
9. No individual should be referred to a program/service for which they are ineligible or unavailable. Individuals will be referred to services they qualify for, with a warm hand-off and follow-up to ensure access to service was provided.

10. Each local Hub program should plan, collaborate, and coordinate services with existing community-based organizations providing long-term services and supports (LTSS) and health-related information to older adults and people with disabilities, in their communities through what is currently known as a local ADRC Advisory Committee and or local/regional Collaborative. Information provided will be comprehensive, up-to-date, and accurate.
11. The ADRC Hubs shall determine minimum standards for the four core ADRC services.
12. The ADRC Hubs will conduct an annual review of extended partners/service providers Spokes.
13. The service provider Spokes should issue consumer satisfaction surveys on an annual basis to determine needed changes and best practices.
14. The ADRC Hubs should provide training and monitor the "services."
15. Develop consumer satisfaction process and procedures to measure outcomes across the state based on the core services, including a pre and post self-reported consumer assessment.
16. Develop a statewide grievance process for consumers who do not get their needs met and/or would like to file a complaint.

It is critical DOR, ILCs, and AAAs come together with CDA to discuss each section of the Hubs & Spokes initiative before the final recommendations are published in December. We look forward to this opportunity to share our concerns while also providing detailed recommendations and suggestions.

Respectfully,



Christina N. Mills
Executive Director

cc: Assemblymember Adrin Nazarian, Chair, Assembly Aging & LTC Committee
Joe Xavier, Executive Director, Department of Rehabilitation
Michael Costa, Executive Director, California Association of Area Agencies on Aging
Kim McCoy Wade, Senior Advisor on Aging, Disability and Alzheimer's, Office of the Governor