



advocacy | action | answers on aging

May 11, 2017

**National Association of
Area Agencies on Aging**

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Heather Menne
U.S. Administration on Aging, Administration for Community Living
Department of Health and Human Services
330 Independence Ave., SW #4760
Washington, DC 20201

Re: HHS/ACL Public Comment Request on National Survey of Older
Americans Act Participants

Dear Ms. Menne:

On behalf of the National Association of Area Agencies on Aging (n4a), which represents the country's 622 Area Agencies on Aging (AAAs) and serves as a voice in the nation's capital for the 256 Title VI Native American aging programs, we are writing in response to the Administration on Aging (AoA), within the Administration for Community Living (ACL), request for comment on updated questions for the next National Survey of Older Americans Act Participants.

AAAs and Title VI programs are on the frontlines of the country's unprecedented demographic shift as 10,000 boomers turn 65 each day, providing services and supports to help older adults age with dignity and independence in their homes and communities. In this role, AAAs serve as regional and local leaders in ensuring the health and safety of older adults and supporting their caregivers.

The Older Americans Act (OAA) is the bedrock of the AAA and Title VI aging program networks—offering not only statutory authority for these key aging entities, but also critical federal leadership and funding to enable local development and provision of life-saving services to older adults. Surveying a subset of consumers who have accessed OAA programs and services is an important role for our federal partner to play to assess consumer satisfaction and gather key demographic data to determine whether the Act's targeting requirements are being effectively met.

We are, therefore, concerned about the reversal of current efforts to collect demographic data about OAA participants who identify as lesbian, gay, bisexual or transgender (LGBT) from National Survey of

Older Americans Act Participants administered by AoA.

As detailed in our August 2016 comments in response to AoA's request for public input on proposed state plan guidance, n4a's members remain committed to the important goal of targeting outreach and service provision to the most vulnerable populations (as identified by Congress and the Administration), even as they strive to make OAA programs and services available to as many older adults as possible. Those same comments also address the desire of our members to more effectively engage and serve LGBT older adults in their communities. To meet that need, n4a has worked with other national organizations to educate and train our members to better identify and serve historically isolated or underserved older adults (and their caregivers) through sessions at our annual conference, via an extensive webinar series, and through the dissemination of educational resources.

However, Area Agencies on Aging have detailed ongoing and unique challenges that they face in adequately reaching out to and serving LGBT older adults. In our August comments, we wrote: "We encourage the Administration, through collaboration with national advocacy organizations, states and local agencies, to continue developing best practices and training for the Aging Network on ways to assess and best serve these at-risk populations." We also raised a concern that the Aging Network in general (our members, but also State Units on Aging and the community-based providers that AAAs contract with) needed more training and education on data collection efforts with this population specifically.

Those realities—both the potential to inadequately identify and/or underserve LGBT seniors and the need for more information, data and training—are why we write today to strongly encourage AoA to restore the demographic questions around sexual orientation and gender identity to the Survey of Older Americans Act Participants. We need federal leadership on this issue and this is a simple, no-cost, already implemented approach to gathering key data on OAA participants who identify as LGBT. We can see no reason why the questions should have been removed from the survey since it was last conducted, and we ask AoA to immediately restore this data collection point to correct the oversight.

The Aging Network believes in a person-centered approach, which means we strive to meet older adults where they are and help them age well with maximum independence, health and dignity. To do that, we must understand the people we are serving, including better assessing important factors such as sexual orientation and gender identity.

Thank you for considering our comments, and we look forward to continuing to work on these important issues with AoA, our national partners, states and our AAAs across the country.

Sincerely,



Sandy Markwood
Chief Executive Officer