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**National Association of  
Area Agencies on Aging**

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November 13, 2015

Stephanie Whittier Eliason  
Office of Elder Justice and Adult Protective Services  
U.S. Administration on Aging, Administration for Community Living  
Department of Health and Human Services  
1 Massachusetts Avenue, NW  
Washington, DC 20001

Re: ACL Draft Voluntary Consensus Guidelines for State Adult  
Protective Services Systems

Dear Ms. Whittier Eliason:

On behalf of the National Association of Area Agencies on Aging (n4a), which represents the country's 623 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 recently proposed Draft Voluntary Consensus Guidelines for State Adult Protective Services Systems.

AAAs and Title VI programs are on the frontlines of the country's unprecedented demographic shift as 10,000 baby boomers turn 65 each day, and these agencies have the role of providing services and supports to help older adults age with dignity and independence in their homes and communities. In this role, AAAs serve as leaders and key partners in ensuring the health and safety of older adults in their homes and communities. Additionally, many AAAs operate local long-term care ombudsman programs, thereby serving older adults and people with disabilities living in long-term care facilities.

As the population of older adults increases, the prevalence of elder abuse and exploitation—especially among the most frail and vulnerable elders—is also rising at a troubling rate. As part of the frontlines of prevention and response efforts in nearly every community, often AAAs or contracted service providers serve as first responders when tragic situations occur. An estimated one out of every 10 older adults is the victim of maltreatment—abuse, neglect, self-neglect or financial exploitation—and AAAs play a critical role in developing and executing intervention and prevention strategies and activities.

Virtually all AAAs offer at least one service or program designed to address elder abuse. The most common services, provided by more than half of all AAAs, are legal assistance, community education or training, public awareness information directly to seniors, participation in an elder abuse prevention coalition or multidisciplinary team and case management for at-risk/vulnerable seniors. We also know that 92 percent of AAAs partner with Adult Protective Services in their communities. (Trends and New Directions, 2014 Area Agencies on Aging Survey, n4a)

Unfortunately, a lack of long-standing and robust federal funding, leadership and infrastructure has positioned local and state APS agencies with a patchwork of varied, inconsistent and often inadequate resources and research to prevent, respond to and fully understand the phenomenon of the maltreatment of older adults. This is why n4a appreciates and supports the Administration on Aging's (AoA/ACL) efforts to take important steps toward augmenting federal leadership on this priority issue. By creating a national Office of Elder Justice and Adult Protective Services and a national resource center to better identify and support effective APS practices; implementing a national data collection system to aid research efforts in learning about the issue and pinpoint effective prevention and intervention strategies; and releasing a set of National Voluntary Consensus Guidelines for State APS systems, AoA is making meaningful headway toward establishing the framework for an effective and cohesive national system to support state and local APS activities.

In response to the Draft Voluntary Consensus Guidelines for State APS Systems, n4a applauds and supports the effort to identify key domains of APS practices, evaluate current research on the issue of adult maltreatment and incorporate proven best practices among APS systems to inform recommendations for state APS systems. We also appreciate that AoA recognizes the reality that a dearth of resources creates for APS efforts nationally, and that the guidelines will constitute neither a standard nor a regulation; will not create any legal obligations; and will not impose any mandates or requirements. Until a dedicated and reliable funding stream for APS systems is established, it is essential that guidelines remain just that—guidelines—and not impose unfunded administrative mandates on already stressed and fiscally strained systems.

Overall, n4a supports the Guidelines as drafted. We believe the recommendations reflect current best practices and research and build upon existing work in the field of APS. We are supportive of the seven specific domains within APS practice that the guidelines cover, and we appreciate that the guidelines were informed by an intensive review of existing research in the field, as well as an environmental scan developed by subject matter experts. We also commend AoA for conducting an intensive stakeholder engagement exercise in the months between the draft guidelines release and the deadline for comments.

Specifically, we would encourage AoA to incorporate sensitivity to community dynamics and demographics in developing the final guidelines. For example, APS systems, resources, practices and even the situations encountered may vary widely between urban and rural areas. Guidelines that are appropriate for systems operating in population-dense areas may be too prescriptive or impossible to implement in locations where older adults are more spread out and where APS staff and key partners may not be as accessible or available.

Additionally, we encourage AoA to include worker safety and security training earlier in the training process. While we appreciate that worker safety is included as part of an advanced training curriculum for APS workers, workers are in the field and potentially encountering dangerous or hazardous situations prior to receiving advanced training. Including worker safety training earlier in the training process may mitigate some of that risk to APS workers and better prepare them to respond effectively and safely when they begin doing field work.

In conclusion, it must be acknowledged that comprehensively incorporating these guidelines into state APS systems will require adequate financial resources to states and, in turn, to localities. Current federal and state APS funding streams are simply insufficient to ensure effective implementation of the recommendations. Furthermore, federally recognized and dedicated stewardship will be required to sustain state adherence to future enforceable regulations, which we feel will ultimately be required to achieve implementation nationally and systemically. While unenforceable, non-binding guidelines are a positive start, we believe a true paradigm shift to enable state APS systems to adequately respond to the growing problem of elder maltreatment will be impossible unless supported by federal financial resources and leadership.

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