



advocacy | action | answers on aging

**National Association of  
Area Agencies on Aging**

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Heather L. Menne  
Social Science Analyst, Office of Performance and Evaluation  
Center for Policy and Evaluation  
Administration on Aging  
Administration for Community Living  
U.S. Department of Health and Human Services  
Washington, DC 20201

RE: Agency Information Collection Activities; Public Comment  
Request; Redesign of Existing Data Collection; National Survey of  
Older Americans Act Participants

*Via Email: [heather.menne@acl.hhs.gov](mailto:heather.menne@acl.hhs.gov)*

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 more than 250 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 the proposed redesign of the National Survey of Older Americans Act Participants (NSOAAP).

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 salute the new longitudinal nature of the survey as part of AoA/ACL's ongoing efforts to improve data collection and analysis.** We hope the new format will further document the health and social benefits of critical Older Americans Act programs and services to older adults and caregivers.

We were pleased to see that this latest NSOAAP continues to include questions related to sexual orientation, as we believe it is critical that older adults who identify as lesbian, gay or bisexual (LGB) have their lives and their needs recognized, counted and attended to in the same way as their heterosexual counterparts. We were disappointed, however, to see that the NSOAPP once again does not include the previously-asked question about gender identity, despite the concerns raised in our May 11 and July 24 letters reacting to the redesign of the previous NSOAAP. We are disappointed that such a particularly vulnerable population as transgender older adults would be left off this national survey to ensure OAA participants' satisfaction.

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. To this end, our members have expressed desire to more effectively engage and serve LGBT older adults in their communities.

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 2016 comments on the proposed State Plan Guidance, 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 strongly urge the Administration to restore the demographic question on gender identity to the NSOAAP.** 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 LGB and T.

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 documenting and recognizing important factors such as gender identity.

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

Sincerely,

A handwritten signature in cursive script that reads "Sandy Markwood". The signature is fluid and connected, with a long, sweeping tail on the "d" of "Markwood".

Sandy Markwood  
Chief Executive Officer