



**DIVERSE  
ELDERS  
COALITION**

734 15<sup>th</sup> Street, NW  
Suite 1050  
Washington, DC 20005

T 202-347-9733

F 202-347-9735

[diverseelders.org](http://diverseelders.org)

[facebook.com/diverseelders](https://facebook.com/diverseelders)

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#### **MEMBER ORGANIZATIONS**

National Asian Pacific  
Center on Aging

National Hispanic  
Council on Aging

National Indian  
Council on Aging

Services and Advocacy  
for GLBT Elders

Southeast Asia Resource  
Action Center

June 12, 2015

Nora Super  
Executive Director  
White House Conference on Aging  
Hubert Humphrey Building  
200 Independence Avenue, Suite 637D  
Washington, DC 20201

Dear Ms. Super:

In consultation with you and your staff at the White House Conference on Aging, as well as with our member organizations, we at the Diverse Elders Coalition would like to submit this addendum to our previous response to the four Policy Briefs your office has released. The recommendations below reflect more specific policy language that our member organizations have put forth in their advocacy work. In terms of federal agencies for specific review or analysis, while some of the recommendations we put forth seek broad based application across the entire government, we also identify some specific agencies where some of these recommendations have more specific provenance.

As in our previous response, we have provided our recommendations in three areas: Data/ Research, Cultural Competence, and Non-Discrimination and Equal Treatment Under the Law:

#### **Data/ Research**

Data collection for diverse elders faces many challenges, including: small sample sizes of specific populations, emerging methodologies that are still identifying the best ways to survey respondents on sexual orientation and gender identity, and hard to reach populations due to factors such as: limited English proficiency, immigration status, and fear of homophobia/ transphobia. Building off our previously submitted response to the WHCOA Policy Briefs, we provide additional recommendations below: SEARAC has supported data collection that, provides enhanced and segmented data that, at the minimum, includes disaggregated race categories used in the Decennial Census- which includes a broader range of different Asian American and Pacific Islander racial groups. Further, SEARAC supports the inclusion of cross-tabulated data by gender, disability, and English proficiency.

SAGE's policy recommendations call for prioritizing the collection of data related to sexual orientation and gender identity in its population based surveys, including those from the U.S. Census Bureau, such as the American Community Survey, the National Decennial Census, and the Current Population Survey.

Having research that captures disaggregated data on racial groups and improved data on sexual orientation and gender identity across the age spectrum will help provide a better picture of the needs, challenges, and resiliences that exist among elders of color and LGBT elders. Applying these standards across all federal agencies that serve elder populations and requiring all agencies that receive federal funding to meet these standards will also be helpful.

## **Cultural and Linguistic Competence**

The National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care (National CLAS Standards) provide a baseline of practices and policies that can be used to measure cultural competence. It is not clear to us that all programs across the board that serve elders and receive federal funding to do so have minimum standards for cultural competence and it will be important for any policy coming out of the White House Conference on Aging to make a clear statement about not only the need to have culturally and linguistically competent services for elder populations, but to have clear standards and metrics to measure progress towards that goal.

SAGE's work has made it very clear that LGBT constituencies have specific needs and that commonalities around sexual orientation, gender, and gender identity constitute communities that have their own cultural contours and require culturally specific policies as well. Their policy asks identify specific agencies where cultural competence standards and practices would be helpful, including State Units on Aging (SUAs) and Area Agencies on Aging (AAAs), as well as HUD and programs that provide housing for LGBT people.

## **Non-Discrimination**

An Executive Order barring discrimination on the basis of sexual orientation and gender identity in entities that serve older adults with federal funds is one of the key policy recommendations put forth by SAGE. This would apply across all agencies and be applicable to any federally funded institution, including nursing homes and long term care settings. Citizenship becomes another aspect around which elders of color and/or LGBT elders face discrimination in aging settings. Federal immigrant eligibility restrictions in Medicaid, for example, require a five year waiting period for lawfully residing immigrants. Undocumented immigrants are not allowed to purchase private plans in the health insurance exchanges and continue to be eligible for most other public programs. Policies and programs serving elders are available unevenly across Indian country and are not uniformly available for Native Hawaiian and Pacific Islander elders that reside in territories or elsewhere besides the fifty states.

Religious discrimination in settings that are funded by the federal government affect diverse elders in a variety of ways. Elders who are Muslim or Sikh for example, are not sufficiently protected by racial profiling language that still contains exemptions for national security. At the same time, current laws and policies are being mis-interpreted or re-enacted to allow for discrimination against LGBT people justified by "religious freedom." Agencies and programs that serve elders should be held to standard non-discrimination language that maintains religious freedom for sincerely held belief and at the same time protects vulnerable populations from being discriminated against.

We hope that this additional guidance will help you make more informed policy recommendations and we look forward to working with you up to the July 13<sup>th</sup> White House Conference on Aging, and more importantly, beyond that one-time event to develop long-standing policy change that makes concrete improvements in the lives of the diverse elder constituencies our members represent, and indeed, for all elders in the United States. As indicated before, please contact me via e-mail at [bdguzman@diverseelders.org](mailto:bdguzman@diverseelders.org) or by phone at 202-347-9733 if you require anything further.

Sincerely,

Ben de Guzman

cc: Michael Adams, SAGE  
Randella Bluehouse, NICOA  
Dr. Yanira Cruz, NHCOA  
Quyên Dinh, SEARAC  
Dr. Wesley Lum, NAPCA

The Diverse Elders Coalition (DEC) advocates for policies and programs that improve aging in our communities as racially and ethnically diverse people, American Indians and Alaska Natives, and LGBT people. Founded in 2010, the DEC focuses on reforming public policies to better serve older people of color and LGBT elders, connecting diverse elders to policy discussions on aging and health, and increasing awareness on the issues that shape our communities.