

Via Email

Greg Link  
Administration for Community Living  
U.S. Administration of Aging  
Department of Health and Human Services  
Washington, DC 20201

RE: Request for New Information Collection for a Program Instruction on Guidance for the Development and Submission of State Plans on Aging, State Plan Amendments and Intrastate Funding Formula

Dear Mr. Link:

I am submitting this letter on behalf of the National Hispanic Council on Aging (NHCOA) in response to the Notice published in the Federal Register on June 21, 2016, which seeks comment regarding the inclusion of a provision in the Administration for Community Living's Program Instruction that would provide guidance regarding the obligation of State Units on Aging to target resources to older adult populations that have the "greatest economic and social need."

I would like to begin by commending ACL for this proposal. We are particularly hopeful because the Older Americans Act requires serving older individuals with greatest economic and social need, as the ACL states in its proposal: "The OAA requires that states give preference to serving older individuals with greatest economic and social need with particular attention to low-income older individuals, including low-income minority older individual, older individuals with limited English proficiency, and older individuals residing in rural areas."

This language describes our constituency of Hispanic older adults. NHCOA is the nation's only national organization focusing solely on the wellbeing of Hispanic older adults, their families and caregivers and the nation's expert on reaching and serving this vulnerable and hard-to-reach population. Each year, NHCOA releases its data- and testimony-driven [\*Status of Hispanic Older Adults: Recommendations from the Field\*](#) that includes a report on the main challenges facing this population, as well as recommendations on how to improve the lives of these seniors.

NHCOA is working closely with the Diverse Elders Coalition in responding to ACL for its proposal. NHCOA is a founding member of the five-member Diverse Elders Coalition, which advocates for policies and programs that improve aging in communities represented by the coalition -- American Indian/Alaska Native elders, Asian American/Pacific Islander elders, Black elders, Hispanic elders, and LGBT elders. As part of the Diverse Elders Coalition effort to respond to ACL, NHCOA's members and allies collected comment cards addressed to the ACL, requesting that the ACL take into account the specific needs of Hispanic older adults in their proposed guidance to states on the development of state plans on aging.

I trust that the ACL is well aware of the statistics surrounding the U.S. Hispanic older adult population. Hispanic older adults face numerous cultural and linguistic barriers and have low-levels of formal education. They are the fastest growing older adult demographic in the nation, but also more likely to be poor or economically insecure, hungry, lack access to quality medical care and live in substandard or unaffordable housing.

What is often not recognized is the incredible resilience and can-do attitude of Hispanic older adults. NHCOA works with community leaders and members on a daily basis. These Hispanic older adults are eager to return to the workforce to ensure that they can close their financial gaps and become economically secure if they are physically able. They are deeply involved in their families and communities. They are eager to help their neighbors and mentor their grandchildren. They are building on lives of sacrifice and hard work for their families and communities and nation with continued service.

They want to access the services for which they are eligible so that they can continue to contribute meaningfully to their families and communities, without being consumed by the economic, health and housing challenges they face. They want to enjoy their golden years in dignity and security.

Unfortunately, many of them do not know that the services they need exist, that they are eligible for them or how to access them. This is because they are socially isolated due to their cultural and linguistic differences from larger society. They are not reached by usual outreach strategies, even if the materials are in Spanish, and they do not go to mainstream organizations for assistance. They are easily overwhelmed by complex enrollment procedures and do not understand U.S. systems. They need assistance that goes beyond Spanish fluency capability to culturally and linguistically appropriate outreach and enrollment procedures. This often means reaching them through community leaders and organizations after creating strong ties to these entities and walking them through enrollment procedures step-by-step.

We at NHCOA urge you for the sake of these dedicated older Americans to ensure that truly culturally competent practices are in place as you continue to implement your state plans under the OAA. We also urge State Units on Aging to partner with and subcontract organizations with a long trajectory of serving Hispanics to effectively serve Hispanic seniors. In sum, we encourage the ACL to take into account the linguistic and cultural needs of Hispanic older adults and to partner with Latino expert organizations like NHCOA in developing ways to close the gap between the services available and the specific needs of this hard-to-reach population. We stand by ready to assist in this effort.

With all best regards.

Sincerely,

A handwritten signature in black ink, appearing to read 'Yanira Cruz', with a long horizontal flourish extending to the right.

Yanira Cruz, Dr.PH  
President & CEO