



Sent by email to: Greg.Link@acl.hhs.gov

August 19, 2016

Greg Link
Administration for Community Living
Washington, DC 20201

Collection Comment Request: Guidance for the Development and Submission of State Plans on Aging, State Plan Amendments and the Intrastate Funding Formula.

Dear Mr. Link,

The National Indian Council on Aging (NICOA), Inc. appreciates the Administration for Community Living (ACL) staff for the development of the comprehensive State Plans on Aging. These plans are essential because they are responsive to the diversity needs of America's aging populations.

NICOA is particularly interested in addressing the services and supports of American Indian, Alaska Native, and Native Hawaiian (AI/AN/NH) elders. NICOA generated a civic outreach effort in collaboration with the Diverse Elders Coalition, to gather comments for the proposed state plan guidance. Our AI/AN/NH elders and allies provided 158 comments that strongly urge ACL to ensure that the Older Americans Act services and supports are accessible to deeply rural communities across the country - focusing explicitly on AI/AN/NH communities. However, over the last few decades there is a growing trend across Indian Country referred to as urban migration. The U.S. Census of 2010 indicates that 78% of American Indians are now residing off Indian Land, near Indian land border towns and urban areas, while 22% remain living on Indian lands. This urban migration acknowledges that AI/AN/NHs are residing in various demographic locations across the country where they require services and supports that are culturally relevant and accessible.

Some states have not adequately facilitated outreach efforts to engage with Indian Nations which prevents government funded programs from reaching areas that are most in need. Jurisdiction and government-to-government respect and consideration for Indian Nations is imperative and should be seen as an opportunity, and not a barrier for access to services. Building partnership development is an important requirement of the Older Americans Act and all federally funded programs.

It is also clearly indicated that the Aging and Disability Resource Centers (ADRC) are limited in their efforts to engage and offer services and supports to Indian Communities both off and on

Indian lands. The ADRCs are further limited in their understanding and efforts to partner and utilize Urban Indian Centers and Healthcare Centers that are already providing culturally relevant services to AI/AN/NH elders that reside off Indian lands. Many of these agencies are underutilized and underfunded. Partnerships with these agencies needs to be strengthened to respond to growing AI/AN/NH aging population needs.

There are deep concerns about services and supports that are still unavailable and tragically underfunded across our demographic areas. These are, coordinated services for elder abuse prevention and intervention services; coordinated long-term services and supports; end of life planning and supports; transportation; legal services; caregiver training and supports; financial counseling; benefits counseling; fraud and financial exploitation programs; long-term care ombudsmen services; discharge care after IHS Hospital care.

The following are a few comments to illustrate these concerns. Please see the 158 comments in their full text as attached.

“Elder Abuse seems to be occurring more frequently and our tribal elders don’t know how or what to do. They are too embarrassed to report it. We do not have a specific person employed by the tribe to deal with this problem.”

“Our meals make such a difference. There are several elders that are homeless, diabetic, or failing and the balanced meals I serve keep the elders healthier for a longer period of time, sometimes it is the only meal they have all day.”

“A great deal of our Native American Elders living on rural reservations have many more needs but resources available through the state systems are not equally and fairly allocated to our elders.”

The collected comments from our elders and allies urge ACL to ensure that AI/AN/NHs are clearly identified in the state plans across the country. It is critical that the state leadership make concerted efforts to provide aging and support services to Indian Country and also make provision for the growing number of elders residing near Indian land border towns and urban areas.

Thank you to the Administration for Community Living for providing this opportunity for public comment.

Sincerely,



Randella Bluehouse
Executive Director