



1201 15th Street NW
Suite 350
Washington, DC 20005
Phone 202-898-2578
Fax 202-898-2583
www.nasuad.org

March 7, 2018

Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)
New Executive Office Bldg.
725 17th St. NW, Rm. 10235
Washington, DC, 20503

Attn: OMB Officer for ACL

**Re: Agency Information Collection Activities; Submission for OMB Review;
Comment Request; Redesign of Existing Data Collection; National Longitudinal
Survey of Older Americans Act Participants (NLSOAAP)**

Submitted electronically: OIRA_submission@omb.eop.gov

President
Lora Connolly
California

Vice President
Duane Mayes
Alaska

Treasurer
Curtis Cunningham
Wisconsin

Secretary
Claudia Schlosberg
Washington D.C.

At-Large
Alice Bonner
Massachusetts

At-Large
Nels Holmgren
Utah

At-Large
Kathleen Dougherty
Delaware

At-Large
Kari Benson
Minnesota

On behalf of the National Association of States United for Aging and Disabilities (NASUAD), I am writing to you in response to the Comment Request regarding redesigning the National Longitudinal Survey of Older Americans Act Participants (NLSOAAP). NASUAD represents the nation's 56 state and territorial agencies on aging and disabilities and supports visionary state leadership, the advancement of state systems innovation and the development of national policies that support home and community-based services for older adults and individuals with disabilities. Our members oversee the implementation of the Older Americans Act (OAA) across the country, and many also serve as the operating agency in their state for Medicaid waivers that serve older adults and individuals with disabilities. Together with our members, we work to design, improve, and sustain state systems delivering home and community-based services and supports for people who are older or have a disability and for their caregivers.

The Administration for Community Living (ACL) is currently in the process of redesigning the National Survey of Older Americans Act Participants (NSOAAP), which is an important tool that is used by states for a variety of purposes.¹ NASUAD commends ACL's efforts on redesigning the NSOAPP that will allow for better reporting, establishing national benchmarks, and program improvement. We were pleased with the inclusion of two items in the new

¹ <https://www.federalregister.gov/documents/2018/02/20/2018-03390/agency-information-collection-activities-submission-for-omb-review-comment-request-redesign-of>

proposed changes that were recommended in NASUAD's comments to the previous notice published in the Federal Register in May 2017.²

Specifically, NASUAD was pleased to see the following proposed changes:

- *Increasing the survey sample size.* This change will allow for improved confidence rates and to provide more useful information that can be stratified by state.
- *Continuing to refine and test questions on sexual orientation.* NASUAD is pleased to see that ACL will continue to work on and refine the inclusion of questions regarding sexual orientation.

NASUAD also supports the transition from a cross-sectional survey to a longitudinal model. This change will allow for improved data collection that better illustrates the value of OAA programs and services, including the avoidance or delay of more costly health or institutional care. With this change, the NSOAAP will become the National Longitudinal Survey of Older Americans Act Participants, or NLSOAAP.

We ask that ACL continue to work closely and collaboratively with states and local entities throughout the redesign process. If you have any questions, please contact Adam Mosey of my staff at amosey@nasuad.org or (202) 898-2578.

Sincerely,



Martha A. Roherty
Executive Director
NASUAD

² <http://nasuad.org/policy/federal-advocacy/advocacy-alerts/nasuad-submits-comments-national-survey-older-american-act>

