



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

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Heather Menne,
U.S. Department of Health and Human Services
Administration for Community Living
Washington, DC 20201

President
Gary Jessee
Texas

Vice President
James Rothrock
Virginia

Treasurer
Lora Connolly
California

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Alice Bonner
Massachusetts

Jed Ziegenhagen
Colorado

RE: Agency Information Collection Activities: National Survey of Older Americans Act Participants

Dear Ms. Menne:

On behalf of the National Association of States United for Aging and Disabilities (NASUAD), I am writing in response to the notice of information collection activities issued by the Administration for Community Living (ACL) at 82 F.R. 13457 on March 13, 2017. NASUAD represents the 56 officially designated state and territorial agencies on aging and disabilities. Each of our members oversees the implementation of the Older Americans Act (OAA), 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 notice includes changes to the National Survey of OAA participants, which is an important tool that is used by states for a variety of purposes. This includes understanding the population served; identifying issues with the health and well-being of participants; and informing policymakers as they plan and allocate resources for individuals. NASUAD and our members believe that the survey is a valuable resource, and we commend ACL for extending the data collection activities. Based on our network's experience with the survey, we offer the following comments:

Survey Participants

Issue: The data collection notice estimates that 4,000 individuals will be surveyed as a component of this survey. NASUAD notes that prior surveys have

experienced nonresponses and small data samples for each element, which hinders the ability of states to utilize the information during their planning processes. In fact, the stratification of data on the survey tools only allows for larger census regions (ie: northeast, southwest, etc.) and not by specific state. Increasing sample size would provide ACL, states, and researchers with much more robust information that could be used to compare programs and policies, improve data within the state plans on aging, and increase understanding of individuals served. Given that the number of older adults is significantly increasing across the country, this information will be increasingly valuable in order to properly target resources to individuals and communities with the greatest need.

Recommendation: We recommend expanding the sample size to increase confidence rates and to provide more useful information that can be stratified by state.

Questions on Sexual Orientation

Issue: The survey collection tool remains largely unchanged from prior years, except for one modification. In the revised data collection tool, the proposed survey removes a block of questions within the demographic section that related to the participant's sexual orientation. In 2015, these questions were grouped under DE1a, and the follow-up questions ran from DE1a1 through DE1a3.

These questions were piloted through the past several iterations of the national survey; however, information on the results has not yet been released due to small sample size and large measure of standard errors. In the data release of prior surveys, ACL states that it, "is working to refine these questions (with other experts in the field), adjust the sample size and obtain an acceptable level of standard error measurement."

NASUAD recognizes the challenges associated with collecting information of this nature, which can be deeply personal and may result in some participants declining to respond. However, as we stated in our response to proposed changes to the State Plan on Aging template last year, we believe that there is opportunity to improve the data collection regarding the needs and prevalence of different populations served by the aging network. Last year, we recommended that ACL work with states and AAAs to examine best practices for data collection in order to better understand the scope of services required by different populations within the network, including individuals in the LGBT community.¹ We continue to believe that there is benefit from better understanding the populations served in order to assist states and AAAs target supports and services to OAA participants.

Recommendation: We recommend that ACL continue to refine this data collection in order to provide meaningful analysis rather than eliminate the questions.

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http://www.nasuad.org/sites/nasuad/files/NASUAD_Comments_OAA_State_Plan_Guidance_LETTERHEAD.pdf

We would be happy to discuss these recommendations with you further. If you have any questions or concerns, please feel free to contact Damon Terzaghi of my staff at dterzaghi@nasuad.org or (202) 898-2578.

Sincerely,



Martha A. Roherty
Executive Director
NASUAD

