



Elder Justice Coalition

April 24, 2024

Alison Barkoff
Principal Deputy Administrator
Administration on Aging, Administration for Community Living
Department of Health & Human Services
330 C Street SW
Washington, DC 20201

Re: EJCC Priorities

Submitted electronically via ejpubliccomments@acl.hhs.gov

Dear Administrator Barkoff:

[The Elder Justice Coalition \(EJC\)](#) appreciates the opportunity to comment on the Request for Information on Elder Justice Coordinating Council (EJCC) Priorities. We are a nonpartisan coalition of 3,000 individuals and organizations dedicated to ending elder abuse, neglect and exploitation via federal policy, including through regulatory action. The EJC was founded in 2003 by five founding elder justice member organizations to coincide with the introduction of the original Elder Justice Act in Congress.

Overall, we recommend:

The EJCC should increase coordination. Programs like Adult Protective Services and the Long-term Care Ombudsman Program should be better connected to other agencies' elder justice programs. For example, the Department of Justice's elder justice coordinators are supporting more coordinated conversation and training with Office of Inspector General's Medicaid Fraud Control Units (MFCUs). This could be achieved by reducing layers of approval to facilitate coordination and encouraging staff from the agencies to work together. We would like the federal coordination to filter down to state level as coordination varies by state.

Develop a better repository of information for the public. The EJCC should become a clearinghouse for current elder abuse research. This would include coordinating all existing government resources and websites, which could be housed at the National Center on Elder Abuse's (NCEA) website. EJCC should also work to coordinate or develop abuse sensitive materials for caregivers, as this is a missing resource.

Increase outreach to the public through public service messaging. EJCC should spend more time with dissemination and produce public service ads to raise awareness. This could be conveyed from the start with messaging like the government cares. Consider public service ads based on covid vaccine messaging (e.g. how to protect against being a victims) timed to run in May for Older Americans month, during holidays, and during World Elder Abuse Awareness Day (WEAAD, June 15th).

Increase data collection. Data should be centralized through the EJCC and easily accessible by Congress. We need proper data collection to give Congress data to support our programs. Data collection should extend beyond APS, LTCOP, and Medicaid incidence reporting of abuse. Most agencies have some data to share and report, which should be included in an EJCC semi-annual and annual data report.

Complete a landscape analysis or community needs assessment. The EJCC should identify and quantify the extent of elder abuse, neglect, and exploitation in the United States, ways to address them, and what additional resources are needed.

Establish a civilian advisory board. The Elder Justice Act created an Advisory Board on Elder Abuse, Neglect, and Exploitation comprised of 27 members appointed by the Secretary from among members of the public who are individuals with experience and expertise in elder abuse, neglect, and exploitation prevention, detection, treatment, intervention, or prosecution. This advisory board was never established. While the EJCC has regularly engaged field, they need regular field advice and input.

Increased focus on timely topics. As work and discussions on social isolation and loneliness continue in the federal government, EJCC should focus on the link to elder abuse. Furthermore, Multidisciplinary Teams (MDTs) are underrecognized and require more attention and funding. We should focus on treating elder abuse as a crime. Finally, we suggest a special hearing meeting on links between Artificial Intelligence and elder abuse.

Expand focus to advance equity. The EJCC should add the Office of Minority Health at the U.S. Department of Health and Human Services and the Centers for Disease Control and Prevention to their membership. Additionally, the EJCC should focus more on tribal issues. We call for at least two meetings a year outside the DC area. We also suggest a special hearing on equity and meeting diverse needs of older adults in elder justice.

Thank you for considering our comments. Please let us know if we can provide any further information. You may reach us at bob@elderjusticecoalition.com

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Blancato". The signature is fluid and cursive, written in a professional style.

Bob Blancato
National Coordinator
Elder Justice Coalition