

September 25, 2019

Lance Richardson, MPA
Administrator and Assistant Secretary for Aging
Administration for Community Living
330 C Street, SW
Washington, DC 20201

Submitted by e-mail to ejcc@acl.hhs.gov

Re: ACL Seeks Public Input on Future Priorities for the Elder Justice Coordinating Council

Dear Administrator Richardson:

On behalf of the National Association of Social Workers (NASW), I am submitting comments on priorities of the Elder Justice Coordinating Council (EJCC). NASW appreciates the opportunity to provide input on this important topic.

As the largest membership organization of professional social workers in the United States, NASW works to enhance the professional growth and development of its 120,000 members, to create and maintain professional social work standards, and to advance sound social policies. Integral to that mission is advocacy for elder justice.

Social workers¹ play multiple roles in preventing and responding to elder abuse, neglect, and exploitation. They created some of the first programs to address elder abuse and remain active in program development and administration,^{2,3} including multidisciplinary teams (MDTs). Social workers engage in elder justice–focused education, research, policy development, and advocacy, including in state and local elder justice coalitions.^{4,5,6} Moreover, social workers help older adults who have experienced elder abuse by providing crisis intervention, supportive counseling, resource linkage, service coordination, and advocacy, among other activities.

The social work profession shares with the Administration for Community Living (ACL) the goal of supporting older adults and family caregivers in maximizing their dignity, health, and independence and in staying engaged within their communities. This work reduces the risk and mitigates the effect of elder abuse and is informed by the social work profession's ethical principles of service, social justice, dignity and worth of the person, and the

¹ NASW defines a *social worker* as someone who possesses (1) a baccalaureate or master's degree in social work from a school or program accredited by the Council on Social Work Education or (2) a doctoral degree in social work. Acronyms for social work degrees and licenses vary.

² New York City Elder Abuse Center. (2019). *History of NYC Elder Abuse Center*. Retrieved from <https://nyceac.org/about/>

³ National Clearinghouse on Abuse in Later Life. (2019). *History*. Retrieved from <https://www.ncall.us/about/about-ncall/>

⁴ California Elder Justice Coalition. (n.d.). *National Network of State Elder Justice Coalitions (NNSEJC)*. Retrieved from <https://www.elderjusticecal.org/nnsejc.html>

⁵ New York State Coalition on Elder Abuse (n.d.). *New York State Coalition on Elder Abuse—A statewide elder abuse outreach effort managed by Lifespan of Greater Rochester Inc.* Retrieved from <https://www.nyselderabuse.org/about>

⁶ Ohio Coalition for Adult Protective Services. (2015). *Our mission*. Retrieved from <https://www.ocapsohio.org/about-ocaps>

importance of social relationships.⁷ Other tenets that inform social workers' elder justice efforts include the person-in-environment perspective, the ecological framework, and systems theory; the strengths perspective and trauma-informed, person-centered service delivery; and striving for cultural and linguistic competence.^{8,9,10}

Given these close connections between the social work profession and the elder justice field, NASW is a longtime supporter of the Elder Justice Act of 2009 (EJA) (S. 795)¹¹ and has closely followed the activities of the EJCC. The association offers the following input for the council's consideration.

EJCC benefits to NASW and the social work profession

The EJCC has emerged as a recognized federal collaboration and repository willing to receive individual and organizational elder justice–related comments, concerns, and requests for action. Its work has increased awareness of federal activities to prevent and address elder abuse, neglect, and exploitation. Furthermore, federal elder justice initiatives, collaboration, and cross-promotion have increased as a result of the EJCC's efforts.

The EJCC's efforts have equipped NASW to inform its members on federal elder justice activities and resources that can enhance social work practice. NASW has especially appreciated learning about programs in which social workers play a role, such as the United States Postal Inspection Service program described during the December 2018 EJCC meeting.¹²

Activities, tools, resources, or components that would help states create and strengthen their systems of services and supports

The EJCC is well positioned to support state elder justice work. The following activities could be especially useful to states in the coming years:

- creating written guidance to inform states' consideration of policymaking on timely topics, such as abuse registries, MDTs, and mandatory reporting
- disseminating information about best practices and evidence-based practices, such as *Understanding Self-Neglect in Adult Healthcare Patients and Evaluating a New Intervention to Prevent It*,^{13,14} *PROTECT* (a program in which adapted Problem-Solving Therapy and anxiety management are integrated into elder

⁷ National Association of Social Workers. (2017). *Code of ethics of the National Association of Social Workers*. Retrieved from <https://www.socialworkers.org/About/Ethics/Code-of-Ethics/Code-of-Ethics-English>

⁸ Herman, C. (2018, May 10). *The reframing initiative in the context of social work* [Web log post]. National Center on Elder Abuse, Center for Digital Aging, World Elder Abuse Awareness Day 2018 series. Retrieved from <https://eldermistreatment.usc.edu/the-reframing-initiative-in-the-context-of-social-work/>

⁹ National Association of Social Workers. (2019, June). *2019 NASW virtual forum: Trauma through the social work lens*. Retrieved from <https://virtualforum.socialworkers.org/>

¹⁰ National Association of Social Workers. (2015). *Standards and indicators for cultural competence in social work practice*. Retrieved from <https://www.socialworkers.org/LinkClick.aspx?fileticket=7dVckZAYUmk%3d&portalid=0>

¹¹ S. 795, 111th Cong. (2009).

¹² Administration for Community Living. (2018, December 5). *Fall 2018 EJCC meeting* [Full video with captions]. Retrieved from <https://acl.gov/programs/elder-justice/fall-2018-ejcc-meeting>

¹³ Administration for Community Living. (2018, September). *Elder justice innovation grants*. Retrieved from <https://acl.gov/programs/elder-justice/elder-justice-innovation-grants-0>

¹⁴ Kuehn, K. (2019, July 25). *News from the field—July 2019* [Web log post]. Retrieved from Adult Protective Services Technical Assistance Resource Center Blog Web site: <https://apstarc.acl.gov/APS-Blog/July-25-2019.aspx>

abuse services to reduce depression and improve self-efficacy),¹⁵ *A Model Intervention for Elder Abuse and Dementia*,¹⁶ and MDTs,^{17,18} highlighting effective state and local elder justice programs, such as the California Elder Justice Coalition, the National Clearinghouse on Abuse in Later Life, the New York City Elder Abuse Center, and the Ohio Coalition for Adult Protective Services

- underscoring the importance of social support both in preventing elder abuse and in reducing the negative impact of elder abuse, as demonstrated by the National Elder Mistreatment Study,¹⁹ an eight-year longitudinal study,²⁰ and subsequent research²¹
- identifying a set of baseline services for elder abuse response in each community; such a framework could include MDTs, temporary shelter, and hospital-based emergency department and inpatient detection and response programs (including protocols and training), to name a few components
- encouraging and supporting the development of state and local elder justice coalitions, in cooperation with the National Network of State Elder Justice Coalitions (<https://www.elderjusticecal.org/national-network.html>) and in addition to existing networks focusing on elder fraud prevention and response.

Ways in which the EJCC could benefit the elder justice community

The EJCC is a tremendous resource to the broader elder justice community, and its meetings have reflected perspectives from numerous stakeholders. At the same time, increased stakeholder participation could amplify and strengthen EJCC's work. NASW urges EJCC member agencies to work with Congressional appropriators and the President to establish an Advisory Board on Elder Abuse, Neglect, and Exploitation, composed of stakeholders from the field, as specified in the EJA within the Patient Protection and Affordable Care Act (P.L. 111-148)

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- ¹⁵ Sirey, J. A., Halkett Mphil, A., Chambers, S., Salamone, A., Bruce, M. L., Raue, P. J., & Berman, J. (2015). PROTECT: A Pilot Program to Integrate Mental Health Treatment into Elder Abuse Services for Older Women. *Journal of Elder Abuse & Neglect*, 27, 438–453. doi:10.1080/08946566.2015.1088422
- ¹⁶ Anetzberger, G. J., Palmisano, B. R., Sanders, M., Bass, D., Dayton, C., Eckert, S., & Schimer, M. R. (2000). A Model Intervention for Elder Abuse and Dementia. *Gerontologist*, 40, 492–497. doi:10.1093/geront/40.4.492 [Full article available as free download at <https://academic.oup.com/gerontologist/article/40/4/492/641855>]
- ¹⁷ University of Southern California, Center on Elder Mistreatment. (2019). *Elder abuse multidisciplinary team project*. Retrieved from <https://eldermistreatment.usc.edu/elder-abuse-mdt-project/>
- ¹⁸ Yonashiro-Cho, J., Rowan, J. M., Gassoumis, Z. D., Gironde, M. W., & Wilber, K. H. (2019). Toward a better understanding of the elder abuse forensic center model: comparing and contrasting four programs in California. *Journal of Elder Abuse & Neglect*. Advance online publication. doi:10.1080/08946566.2019.1647326 [See also other publications by Kathleen Wilber on MDTs (<https://gero.usc.edu/faculty/wilber/>).]
- ¹⁹ Acierno, R., Hernandez, M. A., Amstadter, A. B., Resnick, H. S., Steve, K., Muzzy, W., & Kilpatrick, D. G. (2010). Prevalence and correlates of emotional, physical, sexual, and financial abuse and potential neglect in the United States: The National Elder Mistreatment Study. *American Journal of Public Health*, 100, 292–297. doi:10.2105/AJPH.2009.163089 [Full text available, free of charge, at www.researchgate.net/publication/40696667_Prevalence_and_Correlates_of_Emotional_Physical_Sexual_and_Financial_Abuse_and_Potential_Neglect_in_the_United_States_The_National_Elder_Mistreatment_Study]
- ²⁰ Acierno, R., Hernandez-Tejada, M. A., Anetzberger, G. J., Loew, D., & Muzzy, W. (2017). The National Elder Mistreatment Study: An 8-year longitudinal study of outcomes. *Journal of Elder Abuse & Neglect*, 29, 254–269. doi:10.1080/08946566.2017.1365031 [Visit www.napsa-now.org/wp-content/uploads/2018/01/R2P-Park-Mulford.pdf for an open-access summary of this article.]
- ²¹ Hernandez-Tejada, M. A., Breckman, R., & Burnes, D. (2019). *The role of social support in the lives of elder abuse victims* [National Adult Protective Services Association–National Committee for the Prevention of Elder Abuse Research to Practice Series]. Retrieved from https://www.napsa-now.org/wp-content/uploads/2012/06/R2P-Brief-The-Role-of-Social-Support-in-the-Lives-of-Elder-Abuse-Victims_V2-Final.pdf

(2010).²² This body would provide an invaluable connection to the broader elder justice community—especially to older adults who have experienced elder abuse, family caregivers, and elder justice professionals—and is essential to the long-term success of the EJCC.

NASW affirms the council’s attention to numerous programs, settings, and populations. The association encourages the council to continue this excellent work by focusing on the following areas:

- increased communication & collaboration between Adult Protective Services (APS) and Area Agencies on Aging (AAAs); NASW has supported identification of elder abuse survivors as a population of greatest social need in reauthorization of the Older Americans Act,²³ a strategy that has proven effective on the state and local levels (such as in Ohio) in the past
- continued or fresh attention to elder abuse prevention and response with underserved populations—such as communities of color (including tribal communities); immigrants and refugees; lesbian, gay, bisexual, transgender, and queer communities; and veterans, among others—and in settings in which elder abuse is under addressed (such as nursing homes, assisted living residences, and hospice programs)
- continued consideration of the intersection of trauma (including elder abuse and previous or concurrent forms of trauma), mental health, and substance use, including remedies beyond incarceration
- multistakeholder dialogue on what constitutes “success” in elder justice; this exploration could include systems-level consideration of APS²⁴ and the Long-Term Care Ombudsman program and research on best practices for elder abuse prevention and intervention
- maximization of funds and technical assistance available through the Office on Violence Against Women (OVW); enhanced collaboration between OVW and other federal entities
- report on the amount and nature of Victims of Crime Act (VOCA)²⁵ fund expenditure on elder abuse by OVC and states or jurisdictions, as specified by the Elder Abuse Prevention and Prosecution Act (2017) (P.L. 115-170)²⁶
- ongoing integration of the Reframing Elder Abuse communications strategy, developed by the FrameWorks Institute and the National Center on Elder Abuse,²⁷ throughout EJCC communications and by EJCC member agencies.

Recognizing that the federal government has done extensive elder justice work with limited funding during the past decade, NASW also encourages EJCC member agencies to work with Congressional appropriators and the President to secure increased funding for all elder justice programs, especially the ones listed below:

²² Patient Protection and Affordable Care Act, 42 U.S.C. §1397k-1 (2010).

²³ Leadership Council of Aging Organizations. (2019). *Leadership Council of Aging Organizations (LCAO) consensus recommendations for the 2019 Older Americans Act reauthorization*. Retrieved from <https://www.lcao.org/chairs-letter-on-the-reauthorization-of-the-older-americans-act/>

²⁴ NASW would particularly welcome research on how educational level (such as a baccalaureate or master’s degree in social work) and staffing ratios influence effectiveness within APS.

²⁵ The Victims of Crime Act of 1984 (42 U.S.C. § 10601) was amended in 1988 as part of the Anti-Drug Abuse Act of 1988 (P.L. 100-690; 102 Stat. 4181).

²⁶ Elder Abuse Prevention and Prosecution Act, P.L. 115-170, 131 Stat. 1208 (2017).

²⁷ National Center on Elder Abuse. (2019). *Reframing Elder Abuse project*. Retrieved from <https://ncea.acl.gov/Resources/Reframing.aspx>

- APS
- MDTs
- elder abuse prevention initiatives, including those provided by AAAs
- services for people who have experienced elder abuse, neglect, and exploitation, including elder justice–specific funding available through OVW (Abuse in Later Life grants), the Family Violence Prevention and Services Act (S. 2430) (1984),²⁸ and VOCA
- health-related elder abuse research by the National Institute on Aging (as has been done in the past).

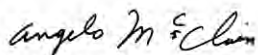
Way to measure the impact and effectiveness of the Elder Justice Coordinating Council on state systems and on survivors of elder abuse, neglect, and exploitation

The EJCC semiannual meeting materials and biennial reports to Congress have been helpful in tracking the council’s progress. NASW respectfully recommends that the EJCC supplement these in-depth resources with concise resources that would be even more accessible to the public:

- a clear articulation of EJCC goals and an operationalized definition of “success,” especially in relation to collaboration and coordination efforts; these goals and indicators could be modeled on information from the Federal Interagency Elder Justice Working Group,²⁹ could be linked with the eight EJCC recommendations³⁰ for example
- a visual representation of organizational structure (federal agencies, work groups, and functions), including individual contact names and information
- consumer-oriented highlights or an executive summary of each biennial report to Congress and semiannual meeting, including a dedicated Web page of links to programs and resources presented by EJCC members and guests in EJCC reports and meetings.

Thank you for your consideration of NASW’s comments. Should you need additional information, please contact me at naswceo@socialworkers.org or (202) 336-8200 or Chris Herman (cherman.nasw@socialworkers.org).

Sincerely,



Angelo McClain, PhD, LICSW
Chief Executive Officer

²⁸ S. 2430, 98th Cong. (1984). [S. 2430 was signed into law as Title III of the Child Abuse Amendments of 1984, P.L. 98-457, 98 Stat. 1757 (1984).]

²⁹ Federal Interagency Elder Justice Working Group. (2018, June 5). *Opportunities for improving intergovernmental coordination and collaboration* [Presentation to the Elder Justice Coordinating Council]. Retrieved from <https://acl.gov/sites/default/files/programs/2018-06/EJWGRecs05-06-18.pdf>

³⁰ Elder Justice Coordinating Council. (2014). *Eight (8) recommendations for increased federal involvement in addressing elder abuse, neglect and exploitation*. Retrieved from https://acl.gov/sites/default/files/programs/2016-09/Eight_Recommendations_for_Increased_Federal_Involvement.pdf