

August 7, 2023

Amy Wiatr-Rodriguez
Director of Regional Operations
Administration for Community Living
U.S. Department of Health and Human Services
330 C Street SW
Washington, D.C. 20201

RE: RIN 0985-AA17 – Request for Deadline Extension for Submitting Public Comments on Proposed Older Americans Act Regulations

Dear Director Wiatr-Rodriguez:

We are writing on behalf of State Units on Aging, Area Agencies on Aging, Title VI Native American Aging Programs, community-based organizations, and other aging services providers from all 50 states, DC, and territories to express our collective interest in extending the deadline for the submission of comments in response to the notice of proposed rulemaking (NPRM) to modernize the regulations of the Older Americans Act (OAA). As organizations deeply invested in the well-being of older adults and caregivers and as representatives of the entities that comprise the Aging Network, **we are formally requesting at least a 15-day extension of the current August 15, 2023 deadline for submitting comments.**

The NPRM's impact on the Aging Network, partner organizations, and the older adults and caregivers they serve is of utmost importance, as it presents a once-in-a-generation opportunity to strengthen OAA programs and adapt them to the evolving needs of our aging population. These proposed rules significantly impact more than 11 million older adults, including elders in 574 federally recognized tribes. To ensure that we provide the most comprehensive and well-informed feedback on this essential federal guidance, we firmly believe that additional time is necessary for thorough analysis and thoughtful consideration.

As you know, the NPRM is long, comprehensive and complicated, presenting certain novel and potentially controversial approaches to the continued implementation of the OAA. It has been 35 years since these regulations were promulgated and last updated, and there is much history to consider. Further, it is essential that the updates address the concerns and ideas of the constituent organizations who implement the OAA every day, and the current 60-day comment period has not provided us with adequate time to consult with our constituents and prepare complete responses for your consideration.

By granting an extension to the deadline, the Administration for Community Living (ACL) will equip us to better engage with our diverse network and other key stakeholders to gather insights and harness the collective wisdom in formulating well-grounded responses. We understand the significance of the NPRM process, and the complexities involved in formulating the proposed updates to the OAA regulations. Therefore, we are committed to dedicating the additional time to prepare a comprehensive response that addresses key issues, potential challenges, and feasible

recommendations to ultimately support ACL's mission to maximize the independence, well-being, and health of older adults, people with disabilities, and their families and caregivers.

Thank you for considering our request. We appreciate your dedication and partnership throughout this process. We are firmly committed to continuing effective implementation of the OAA and want to provide the proposed changes the full consideration of our constituencies to ensure that the best results occur for the older adults we serve. If you have any questions or require further information, please do not hesitate to contact us.

Sincerely,

ADvancing States
Aging Life Care Association
American Foundation for the Blind
Association for Education and Rehabilitation of the Blind and Visually Impaired
Center for Medicare Advocacy
The Gerontological Society of America
International Association for Indigenous Aging
Meals on Wheels America
National Adult Day Services Association (NADSA)
National Adult Protective Services Association (NAPSA)
National Alliance for Caregiving (NAC)
National Association of Nutrition and Aging Services Programs (NANASP)
National Association of Senior Legal Hotlines
National Association of State Long Term Care Ombudsman Programs (NASOP)
National Council on Aging (NCOA)
Network of Jewish Human Service Agencies
USAging

Cc: ACL Administrator and Acting Assistant Secretary for Aging Alison Barkoff, Deputy Assistant Secretary for Aging Edwin Walker, Office of Management and Budget