

Greg Link  
Administration for Community Living  
U.S. Administration on Aging  
Department of Health and Human Services  
Washington, DC 20201

August 22, 2016

Dear Mr. Link,

The undersigned organizations are submitting this letter in response to the Notice published in the Federal Register on June 21, 2016, which seeks comments regarding the inclusion of a provision in the Administration for Community Living's (ACL) proposed Program Instruction that would provide guidance regarding the obligation of State Units on Aging to target resources to older adult populations that have the "greatest economic and social need." Specifically, this letter addresses the proposed targeting guidance within the Program Instructions as it relates to Holocaust survivors.

Following the 2016 reauthorization of the Older Americans Act (OAA), which included a new provision ("Section 10") directing the Assistant Secretary for Aging to issue guidance for conducting outreach to and serving Holocaust survivors, The Jewish Federations of North America (JFNA) brought together 56 experts from secular and religious aging service providers, national aging service organizations, and institutions specializing in services to Holocaust survivors for three phone calls to review the Program Instructions and gather feedback and recommendations in response to the Notice. In addition, agencies providing direct services to survivors were encouraged to submit in-depth recommendations to JFNA through an online survey. We received recommendations from 24 communities in the following states: Arkansas, Arizona, California, Connecticut, Florida, Missouri, New Jersey, New York, Ohio, Pennsylvania, and Texas.

We commend ACL for including Holocaust survivors in its targeting guidance and acknowledging that being a Holocaust survivor can "limit the degree to which older adults experience full inclusion in society and are able to access available services and supports." However, we are concerned that, without enforcement, states that have little experience with or education about Holocaust survivors and their unique needs are unlikely to effectively target resources in a way that enables Holocaust survivors to live their last years with dignity and safety in their homes.

The OAA defines "greatest social need" as the need caused by "physical and mental disabilities" and by "cultural, social or geographic isolation, including isolation caused by racial or ethnic status." Under this definition, the majority of Holocaust survivors are at a high risk of being in greatest social need. As survivors age, many begin to suffer from mental health complications that include anxiety, depression, and post-traumatic stress disorder (PTSD), all of which stem from traumatic experiences during the Holocaust. Facing the normal stressors of aging and the loss associated with it can be particularly painful for survivors. As Sandor Samuels, former President and CEO of Bet Tzedek Legal Services, told the U.S. Senate Special Committee on Aging in 2014, "On account of wartime and post-war experiences, the struggles of aging can be greatly magnified for survivors, creating a group that ages differently and has more acute needs than do other older Americans."

Furthermore, Holocaust survivors have some unique attributes that contribute to their greatest

social need status. The Holocaust was responsible for the mass killing of six million Jewish men, women, and children. As a result, many survivors do not have large extended families, reducing their options for family caregiving. Additionally, the youngest survivors in the U.S. immigrated from the former Soviet Union (FSU) in the 1980s and 1990s, and many are still unable to speak English. These language barriers contribute to further isolation.

The OAA defines “greatest economic need” as “the need resulting from an income level at or below the poverty line.” Under this definition, many Holocaust survivors are at or at high risk of being in greatest economic need. Research indicates that at least 25 percent of survivors live at or below the poverty line, although survivors from the FSU, as well as those living in New York City and Los Angeles, face poverty rates closer to 50 percent. Participants in our calls and surveys reported that poverty, which can create stress and mental and physical health issues for all older adults, is especially traumatic for survivors for whom it reminds them of experiences of deprivation during the Holocaust.

Public health experts agree that overall health outcomes for older adults who age in place are often better than for those in unnecessary or premature institutional care. However, if a Holocaust survivor loses their independence once again and enters an institutional setting, the negative impact is further exacerbated due to the many potential Holocaust triggers that are prevalent in institutions. Therefore, home-based services are critical for this population. Moreover, Holocaust survivors correlate displays of weakness with certain death, making them unlikely to seek out services. In spite of this critical need to help Holocaust survivors age in place, we do not believe that most State Units on Aging (SUAs) are currently making systematic efforts to assess the needs of Holocaust survivors, nor do they possess the requisite guidance or training to adequately serve this population.

It is the undersigned organizations’ opinion that a Federal mandate requiring SUAs to assess the needs of Holocaust survivors will ensure the maximum inclusion of this population in programs funded under the OAA. Accordingly, we ask ACL to modify the proposed guidance to expressly require States to describe the actions that should be taken to address the needs of Holocaust survivors. While each state would retain the right to determine, based on its assessment, whether survivors have greatest economic and social need, we expect that after engaging in a comprehensive, good-faith, effort of this population’s needs, many states will conclude that they do. Furthermore, we believe that SUAs require specific guidance on how best to serve survivors in order to avoid retraumatization. In this vein, we have put together a comprehensive recommendations guide that we believe could be used by ACL for further guidance, including technical assistance.

We appreciate your consideration of this request and materials and look forward to continuing to work with ACL in this effort. If you or your colleagues at ACL have any questions about our recommendations and proposed guidance, please contact Elizabeth Leibowitz, JFNA’s Director of Government Affairs, at [Elizabeth.Leibowitz@JewishFederations.org](mailto:Elizabeth.Leibowitz@JewishFederations.org) or 202-736-5878.

Respectfully submitted,

**National Organization Cosigners**

1. Agudath Israel of America
2. Association of Jewish Family and Children's Agencies
3. B'nai B'rith International
4. Conference on Jewish Material Claims Against Germany
5. Easterseals

6. Hadassah, The Women's Zionist Organization of America, Inc.
7. International Association of Jewish Vocational Services
8. Jewish Council for Public Affairs
9. Jewish Women International
10. LeadingAge
11. Lutheran Services in America
12. National Association of Nutrition and Aging Services Programs (NANASP)
13. National Council on Aging
14. National Human Services Assembly
15. Services and Advocacy for GLBT Elders
16. The Blue Card
17. The Jewish Federations of North America
18. The National Consumer Voice for Quality Long-Term Care
19. World Jewish Restitution Organization (WRJO)

**Local Organization Cosigners**

20. Bet Tzedek Legal Services
21. Charleston Jewish Federation
22. CJE SeniorLife
23. Ferd & Gladys Alpert Jewish Family & Children's Service of Palm Beach County, Inc.
24. Goodman Jewish Family Service of Broward
25. Guardians of the Sick/Bikur Cholim Chesed Organization
26. Gulf Coast Jewish Family & Community Services
27. Holocaust Resource Center of Buffalo
28. Indianapolis Jewish Community Relations Council
29. Indianapolis Jewish Family Services
30. Jewish Community Relations Council of Greater Boston
31. Jewish Community Relations Council of the Jewish Federation of Greater New Haven
32. Jewish Family & Career Services of Atlanta
33. Jewish Family & Career Services of Louisville
34. Jewish Family & Community Services East Bay
35. Jewish Family and Children's Service of Minneapolis
36. Jewish Family and Children's Service of Greater Philadelphia
37. Jewish Family and Children's Services of Southern Arizona
38. Jewish Family Service & Children's Center of Greater Clifton/Passaic
39. Jewish Family Service of Buffalo & Erie County New York
40. Jewish Family Service of Houston
41. Jewish Family Service of Los Angeles
42. Jewish Family Service of Metropolitan Detroit
43. Jewish Family Service of MetroWest NJ
44. Jewish Family Service of North Jersey
45. Jewish Family Service of Northeastern Pennsylvania
46. Jewish Family Service of Orange County, NY
47. Jewish Family Service of Salt Lake City
48. Jewish Family Service of San Diego

49. Jewish Family Service of Seattle
50. Jewish Family Service of Somerset, Hunterdon and Warren Counties
51. Jewish Family Service of St. Paul
52. Jewish Family Service of the Cincinnati Area
53. Jewish Family Services of Columbus, Ohio
54. Jewish Family Services of Greater Hartford
55. Jewish Family Services of Silicon Valley
56. Jewish Federation & Family Services, Orange County, CA
57. Jewish Federation Association of Connecticut (JFACT)
58. Jewish Federation of Greater Des Moines
59. Jewish Federation of Greater Indianapolis
60. Jewish Federation of Greater Philadelphia
61. Jewish Federation of Greater Santa Barbara
62. Jewish Federation of Greater Seattle
63. Jewish Federation of Metropolitan Chicago
64. Jewish Federation of Peoria
65. Jewish Social Services of Madison
66. NJ State Association of Jewish Federations
67. Ohio Jewish Communities
68. Rockland Jewish Family Service
69. Ruth & Norman Rales Jewish Family Services, Inc.
70. Samost Jewish Family & Children's Service of Southern New Jersey
71. Selfhelp Community Services, Inc.
72. The Center for Holocaust and Humanity Education, Cincinnati
73. The Community Relations Council of the Jewish Alliance of Greater Rhode Island
74. The Greater Miami Jewish Federation and its Jewish Community Relations Council
75. The Jewish Community Foundation of Greater MetroWest
76. The Jewish Community Relations Committee of Columbus, Ohio
77. The Jewish Community Relations Council of the Jewish Federation of Greater Orlando
78. The Jewish Federation of Fort Worth & Tarrant County
79. The Jewish Federation of Greater Kansas City
80. The Jewish Federation of Greater Los Angeles
81. The Jewish Federation of Greater New Orleans
82. The Jewish Federation of Reading
83. The Jewish Federation of St. Joseph Valley
84. The Jewish Federation of the Sacramento Region
85. The United Jewish Organizations of Williamsburg and North Brooklyn
86. UJA-Federation of New York