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June 12, 2015

Ms. Nora Super, Executive Director  
White House Conference on Aging  
200 Independence Avenue SW, Suite 637D  
Hubert H. Humphrey Building  
Washington, DC 20201

## **RE: LSA Policy Recommendations to the 2015 White House Conference on Aging**

Dear Ms. Super:

On behalf of Lutheran Services in America (LSA), thank you for the opportunity to review and provide input on the White House Conference on Aging's (WHCOA) four key issue areas: healthy aging, long-term services and supports, elder justice, and retirement security. We appreciate your commitment to gathering stakeholder input and to ensuring the success of the 2015 WHCOA.

LSA is a nationwide network of more than 300 Lutheran health and human services organizations that touch the lives of one in 50 Americans each year. Our members serve low-income, vulnerable people of all ages, faiths, and abilities in a variety of settings across the country. Nearly two-thirds of LSA member organizations provide services to older adults, including home and community-based services, such as adult day; case management; caregiver support; and senior nutrition services; as well as person-centered senior residential and facility-based care, including rehabilitation; health care; and respite.

LSA is committed to advancing the health, dignity, and independence older adults, their families, and caregivers. We support policies that promote healthy aging, including through preventive programs that maximize seniors' physical, mental, and social well-being; and those to prevent, identify, and respond to elder abuse and financial exploitation. We recognize that an adequately financed, person-centered long-term services and supports delivery system is critical to improving health outcomes, well-being and quality of life; as is individual economic, retirement, and health security.

Many of the ideas and recommendations included in the WHCOA policy briefs reflect these key principles. **We appreciate the opportunity to comment, and respectfully submit the following policy recommendations for your consideration:**

### Long-Term Services and Supports

- Develop and adequately fund a national system to finance and provide access to high-quality, culturally competent long-term services and supports (LTSS) for all Americans.
- Eliminate Medicaid's historical institutional bias.
- Increase federal funding and support for critical home and community-based programs, such as those authorized by the Older Americans Act.

- Eliminate the Medicare requirement that a beneficiary must be “homebound” as narrowly defined in current law and implementing regulations in order to receive ongoing home care coverage.
- Increase funding for federal programs that support family caregivers, including the National Family Caregiver Support Program and the Lifespan Respite Care Program.
- Support efforts to help providers identify and implement strategies to respond to the emerging trends in the post-acute care market, so that they can continue to provide care to those that need it most.
- Develop and promote unique approaches to offer and fund improved team-based training for LTSS care providers, including direct-care workers, family caregivers, and health care professionals.
- Enhance, improve, and extend the Balancing Incentive Program (BIP) and Money Follows the Person (MFP), and further improve mechanisms for ensuring that Medicaid beneficiaries can both choose and access home and community-based LTSS.

#### Healthy Aging

- Count time spent in observation status towards the three-day prior hospitalization requirement to be eligible for the Medicare skilled nursing facility (SNF) benefit.
- Build the capacity of the eldercare workforce and provide training in geriatric principles.
- Implement and adequately fund innovative care coordination models that increase supports and provide caregiver training.
- Make the Qualified Individual (QI) program and the Medicare improvement for Patients and Providers Act (MIPPA) low-income outreach and enrollment funding permanent.
- Establish dementia as a qualifying event for the Medicare home health benefit.

#### Retirement Security

- Expand Social Security benefits and extend program solvency by increasing benefits across-the-board; instituting the Consumer Price Index for the Elderly (CPI-E), which reflects actual elder spending patterns; adding a caregiver credit, which recognizes interruptions in labor force participation to provide services to family members. Any enhancements in Social Security benefits should be exempt from income and should not count for the purpose of Supplement Security Income (SSI) eligibility or benefit amount.
- Support programs and policies that enhance individual health and economic security.

- Secure adequate administrative funding for the Social Security Administration (SSA) in order to increase staffing and office hours, reduce wait times for applicants and beneficiaries, and reinstitute the mailing of annual benefit statements.
- Support reallocation of the Old-Age and Survivors (OASI) payroll tax to address the imminent funding shortfall in the Social Security Disability Insurance (SSDI) program.

### Elder Justice

- Create a dedicated federal funding stream for Adult Protective Services (APS).
- Develop a national APS system based on standardized data collection, a core set of service provision standards, and best practices. This national program should be administered by the Administration for Community Living.
- Ensure adequate funding for and provision of culturally competent provider and workforce training.
- Banking regulations currently require reporting of suspected fraudulent transactions due to senior exploitation. Direct the Treasury Department to enhance reporting of data and outcomes from Suspicious Activity Reports (SARs) including giving feedback on outcomes to financial institutions who file SARs. Report SARs to local law enforcement and Adult Protective Services.
- Direct all federal agencies who are a part of the Elder Justice Coordinating Council to have elder abuse prevention information, including where to report elder abuse at the state and local levels, on their respective websites.

Thank you again for the opportunity to provide input on these important issues. We truly appreciate your leadership in guiding the 2015 WHCOA, and look forward to continued engagement as this process continues. If you have questions, please contact me at [lcopeland@lutheranservices.org](mailto:lcopeland@lutheranservices.org), or (202) 499-5832.

Sincerely,

Lindsey Copeland  
Director, Public Policy and Advocacy  
Lutheran Services in America