

Understanding the ACL Comment Period on Including a Question on Transgender Identity in the National Survey of Older Americans Act Participants

Background

In 2014, the ACL added a demographic question on LGBT status to the National Survey of Older Americans Act Participants (NSOAAP), a critical federal survey that measures the efficacy of federally-funded aging programs in meeting the needs of the most vulnerable elders in the nation. In 2017, the Trump administration tried to remove the question – the only question in the more than 100-page survey to be removed. After a comment period and public push-back, the ACL reinstated the sexual orientation demographic question, but not the question about gender identity, which identified how many older Americans identify as transgender. SAGE is currently working to ensure that the ACL reinstates the transgender question on the NSOAAP through submitting comments from valued partners and leaders in the aging community such as yourself.

Transgender elders – the one segment of the LGBT community that the ACL has decided to stop collecting data about – are the people most likely to have the greatest social and economic need. Transgender elders are even more likely than other LGB older people to suffer from physical and mental disabilities, face cultural, social, or geographic isolation, and have an income level at or below the poverty line. At the same time, the shortage of culturally competent providers and fear of discrimination are especially acute for transgender elders. As a result, transgender elders are at a particularly high risk of not receiving the services and supports that they need to live independently.

Collecting data about the gender identity of participants in Older Americans Act (OAA) funded programs can enable the ACL to determine whether transgender older people are receiving the services they require to age with dignity and respect. Consequently, collecting this data will allow ACL to ensure that states are channeling funds provided under the OAA to older people with greatest social and economic needs.

What Can You Do?

The ACL is working to include a module on the survey about COVID-19 and its effect on the services participants receive through the Older Americans Act. Having undergone a lifetime of systemic discrimination and in turn poorer health outcomes, older LGBTQ people are especially vulnerable, especially trans elders. This vulnerability, alongside a lesser likelihood to reach out to healthcare providers, leads to unique challenges facing this community. That's why it is crucial for the ACL to fully understand the effects of COVID-19 on transgender people and why we need you to call on them to reinstate this question.

Public comments allow for facts and perspectives previously unrepresented in the original draft to have a voice. The goal of commenting is to help the ACL make an informed decision on inclusivity in the NSOAAP and to demonstrate the importance of transgender visibility

The current comment period runs until May 3. SAGE is mobilizing our partners to submit comments in support of reinstating the transgender question to better direct OAA funding to the people that need it most. The ACL needs to hear from you as to why this question is so important. Visit www.sageusa.org/accomment to submit your comment and stand up for trans visibility. You can learn more about the comment period and the NSOAAP [here](#).