



August 14, 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, DC 20201

RE: Older Americans Act Notice of Proposed Rulemaking (ACL-2023-0001)

Dear Director Wiatr-Rodriguez,

On behalf of the Coalition to End Social Isolation and Loneliness (the Coalition), we appreciate the opportunity to provide input on the *Older Americans Act: Grants to State and Community Programs on Aging; Grants to Indian Tribes for Support and Nutrition Services; Grants for Supportive and Nutritional Services to Older Hawaiian Natives; and Allotments for Vulnerable Elder Rights Protection Activities* Proposed Rulemaking.¹ Established in 2018, the Coalition brings together a diverse set of national organizations including consumer groups, technology innovators, health care providers, patient advocates, and health plans to develop and advocate for federal policy solutions to address the issues of social isolation and loneliness in the United States. With a comprehensive [policy agenda](#) that focuses on public awareness, social and health services, technology, and research, the Coalition works to combat the adverse health effects of social isolation and loneliness and advance approaches that improve social connectedness for all Americans through targeted and evidence-based policy recommendations. Coalition members, many of whom are part of the Aging Network, also participate in our Older Adults Working Group to address the unique social isolation, loneliness, and social connection challenges facing the aging population.

The Coalition commends the Administration for Community Living (ACL) for its long-standing commitment to maximize the independence, well-being, and health of older adults, people with disabilities across the lifespan, and their families and caregivers. ACL's proposed rulemaking demonstrates a commendable commitment to health equity with the prioritization of those with the greatest social and economic needs while addressing social isolation and loneliness, and fostering meaningful social connection.

We appreciate the opportunity to offer comments and recommendations to further support the Aging Network's implementation of this critical work, ensuring its effectiveness and long-term success.

Introduction

Evidence shows that social isolation and loneliness take a toll on individuals, leading to poorer health outcomes, higher rates of mortality, and higher healthcare costs. Research shows that social isolation can lead to a 29 percent increased risk of mortality and loneliness a 26 percent increase, comparable to that of obesity and cigarette smoking.² Other studies have found that social isolation and loneliness are strongly related to poor health, particularly with respect to arthritis, mobility impairment, and depression.

¹ [88 FR 39568](#)

² Emily Barone/Elijah Wolfson for TIME; SourcePRO. 2020



Furthermore, social isolation has been associated with significant co-occurring conditions such as chronic lung disease, heart disease, arthritis, mobility limitations, depressive symptoms, self-neglect, elder abuse, and exploitation.³

For older adults, social isolation and loneliness increase the risk of dementia and stroke by 50 percent and 32 percent, respectively. Not to mention, the risk of mental health disorders increases by 26 percent for older adults.⁴ In addition to the negative health effects, it is estimated that Medicare spends close to \$7 billion annually as a result of individuals being socially isolated.⁵ Given the detrimental impacts of social isolation and loneliness on the mental and physical health of older adults, it is imperative to address both facets to improve the well-being of this population.

We also know that racial and ethnic communities often face systemic barriers that contribute to social isolation, including limited access to resources, healthcare disparities, and discrimination. Seventy-five percent of Hispanic adults and 68 percent of Black adults were classified as lonely in 2021.⁶ LGBTQ individuals, especially those belonging to multiple marginalized groups, can experience heightened social isolation due to prejudice, stigma, and lack of inclusive support networks, and as a result, they are more likely to report being lonely.⁷ In addition, rurality exacerbates these challenges by presenting additional barriers such as geographical distance, limited transportation options, and reduced access to community services.⁸

Unfortunately, aging can further compound these issues, as older adults with these intersecting identities may encounter ageism, reduced social support systems, and increased risk of isolation and loneliness.⁹ Addressing these intersectional impacts requires a comprehensive approach that addresses systemic inequalities, promotes inclusive policies and programs, and fosters culturally sensitive support networks to ensure that every individual is empowered and has the opportunity to forge meaningful social connections and combat social isolation and loneliness.

Integrate Social Isolation and Loneliness into the Definition of “Greatest Social Need”

The Coalition supports the ACL’s proposal to include social isolation in their definition of “greatest social need” to better address and respond to the substantial social needs faced by older adults. Standardized regulatory definitions and guidance:

- 1) Help clarify the ACL’s expectations for states, Area Agencies on Aging, and other agencies on aging;
- 2) Provide ACL with the opportunity to highlight innovations and best practices learned during the COVID-19 public health emergency; and,

³ Julianne Holt-Lunstead, et al. Loneliness and Social Isolation as Risk Factors for Mortality: A Meta-Analytic Review. 2016.

⁴ Emma Rubin. Elderly Loneliness Statistics. 2023. <https://www.consumeraffairs.com/health/elderly-loneliness-statistics.html>

⁵ Colleen Walsh. Young adults hardest hit by loneliness during pandemic. 2021. <https://news.harvard.edu/gazette/story/2021/02/young-adults-hardest-hit-by-loneliness-during-pandemic/>

⁶ The Cigna Group The Loneliness Epidemic Persists: [A Post-Pandemic Look at the State of Loneliness among U.S. Adults.](#)

⁷ American Heart Association [Protecting LGBTQ People from the Health Risks of Social Isolation.](#)

⁸ University of Minnesota Rural Health Research Center. [Key Informant Perspectives on Rural Social Isolation and Loneliness.](#)

⁹ National Academies Press (US) [Social Isolation and Loneliness in Older Adults: Opportunities for the Health Care System – Risk and Protective Factors for Social Isolation and Loneliness.](#)



3) More prominently center social isolation interventions as a key component of Older Americans Act plans and programs.

Define Social Isolation

To ensure that Aging Network organizations are implementing programs that meet the needs of the populations they serve, **the Coalition urges the ACL to include the [Foundation for Social Connection's](#) (Foundation) definition of social isolation within the implementing regulation.** The Foundation defines social isolation as having objectively few social relationships, social roles, and group memberships, and infrequent social interaction. While we appreciate that the 2020 reauthorization of the Older Americans Act explicitly authorized the Aging Network to address social isolation, it remains important to continue to expand the use of evidence-based, culturally competent interventions to address social isolation such as telephone reassurance and friendly visiting programs.

Include and Define Loneliness

It is also important to note that even though social isolation is strongly related to loneliness and social connection, social isolation and loneliness are distinct experiences. The Foundation defines loneliness as a subjective unpleasant or distressing feeling of isolation. A perceived discrepancy between one's actual and desired level of social connection.

To ensure that Aging Network organizations implement programs that also address loneliness, **we recommend that the ACL revise the definition of "Greatest Social Need" to also include loneliness given the link between social isolation and loneliness and the impact on older adults.** We further recommend that ACL provide additional guidance to Aging Network organizations on opportunities to utilize the Older Americans Act to address social isolation, loneliness, and social connection for the service populations.

The National Family Caregiver Support Program

The Coalition supports the ACL's inclusion of family caregivers as a designated service population as identified within the National Family Caregiver Support Program. We also support the proposed rule's clarification regarding available family caregiver support services under Title III, Part E of the Act.

Caregivers play a crucial role in supporting the well-being and independence of older adults and acknowledging their efforts through the program aids in recognizing the valuable contributions they make. While the act of providing care can be fulfilling and meaningful, caregivers without adequate workplace, financial, and other support are at higher risk of becoming isolated, lonely, depressed, and ill themselves. Caregivers frequently face round-the-clock responsibilities, including tasks like administering medications, assisting with personal care, managing appointments, and providing emotional support. These responsibilities can be physically and emotionally draining as research shows that nearly 4 in 10 caregivers consider their caregiving situation to be highly stressful.¹⁰

The constant pressure and lack of respite can lead to caregivers feeling trapped, isolated, and unfortunately deprioritizing their own social needs and connections to continue meeting the needs of the care recipient. Over time, this isolation and neglect of self-care can lead to a sense of loneliness. Recognizing the immense challenges faced by caregivers and implementing supportive measures can play a vital role in mitigating the negative consequences on caregivers' mental and emotional well-being. As such, **the Coalition recommends that the ACL encourage social isolation and loneliness**

¹⁰ AARP and National Alliance for Caregiving. Caregiving in the United States 2020. Washington, DC: AARP. May 2020. <https://doi.org/10.26419/ppi.00103.001>



interventions within the National Family Caregiver Support Program to support caregivers at risk for experiencing social isolation and loneliness. To capitalize on the Aging Network’s existing role in reducing social isolation among older adults and caregivers, the Coalition recommends ACL leverage the Older Americans Act congregate and home-delivered nutrition programs, supportive services, evidence-based disease prevention programs, multigenerational services, resource centers, and other state/local programs to address the impact of social isolation and loneliness on mental and physical health and improve social connectedness.

Incorporating Social Isolation and Social Connection in State Plans on Aging

State agencies are responsible for developing and implementing a multi-year State plan on aging which lays out the goals and objectives of the State regarding assisting older adults, their families, and caregivers. Setting these goals within the State plan serves as a measure of accountability for agencies, ensuring that they fulfill their intended objectives throughout the designated plan period. To leverage the role of State plans to address social isolation and loneliness, **the Coalition urges the ACL to consider implementing recommendations outlined in our [policy agenda](#) that incentivize States to incorporate activities that foster social connection in their State aging plans.**

For instance, technology has the potential to foster social connection and alleviate social isolation and loneliness by providing avenues for communication, community building, and establishing virtual support networks. An analysis of over 60,000 individuals aged 50 or older found a significant association between internet use and decreased loneliness.¹¹ In addition, among older adults, more frequent internet use is associated with reduced depression levels in individuals both cross-sectionally and longitudinally.¹²

With solid observations of the importance of safe digital literacy as a mitigating factor against loneliness and isolation in our elderly population, a fundamental issue becomes how to provide the necessary digital skills through specialized and highly targeted digital learning. **The Coalition recommends that evaluation strategies examine which technologies, digital tools, or usages promote and facilitate social connection and which exacerbate social isolation and loneliness.** As we previously described, social connection can act as a protective factor against social isolation and loneliness by providing emotional support, practical assistance, a sense of purpose and belonging, and opportunities for engagement and participation. When people have strong social connections, they are more likely to feel valued, understood, and included in their communities.

Additionally, to enable the timely identification of social risk factors that may cause stress and enhance State agencies’ capacity to customize supports and services, **the Coalition recommends that the ACL provides guidance and technical assistance to help State agencies incorporate screening tools or measures directly related to social isolation, loneliness, and social connection in their state aging plans.** The Systems of Cross-sector Integration and Action across the Lifespan (SOCIAL) Framework published by the Foundation recommends that government agencies develop a consistent, evidence-based set of benchmarks and measures related to social isolation, loneliness, and social connection.¹³ Our partners at the Foundation, in conjunction with its Scientific Advisory Council, have been engaged in cooperative efforts with multiple stakeholders such as the National Health and Nutrition Examination Survey, the National Health Interview Survey, Healthy People, and the Office of the Surgeon General. The aim of these collaborations is to establish uniform measurement protocols. The Foundation has made

¹¹ Patrícia Silva, Alice Delerue Matos & Roberto Martinez-Pecino (2022) Can the internet reduce the loneliness of 50+ living alone?, *Information, Communication & Society*, 25:1, 17-33, DOI: 10.1080/1369118X.2020.1760917

¹² Cotten SR, Ford G, Ford S, Hale TM. Internet use and depression among retired older adults in the United States: a longitudinal analysis. *J Gerontol B Psychol Sci Soc Sci*. 2014 Sep;69(5):763-71. doi: 10.1093/geronb/gbu018.

¹³ Foundation for Social Connection [SOCIAL Framework: The Work, Employment, & Labor \(WEL\) Sector](#)



available an open source compilation of related metrics, accessible [here](#), and the Coalition recommends that ACL provide one or more of these tools to State agencies. Furthermore, the Foundation is releasing an *Action Guide for Building Socially Connected Communities*. This guide will provide instructions for community leaders to develop social connection strategies, and effectively monitor and assess their impact. Ongoing evaluation of the levels of social isolation, loneliness, and social connection within targeted communities would inform ACL and State agencies on their baseline and progress towards enhancing the quality of care, outcomes, and overall health of older adults, people with disabilities across the lifespan, and their families and caregivers.¹⁴

Conclusion

We commend the efforts of the ACL in updating the implementing regulations of the Older Americans Act to promote and facilitate equitable access to all individuals who receive these services. It is crucial to actively incorporate elements that acknowledge and address social isolation in order to strengthen the health and well-being of older adults, individuals with disabilities, and their caregivers. By recognizing the significance of these factors and incorporating appropriate measures, we can enhance the quality of life for those at-risk for social isolation and loneliness.

The Coalition to End Social Isolation and Loneliness appreciates the opportunity to provide input on this proposed rule and welcomes discussing these recommendations with you further. Please do not hesitate to contact me by email at dsekoni@healthspieren.com, with any specific questions.

Sincerely,

Daneen Sekoni

Daneen Sekoni

Senior Policy Advisor

¹⁴ Smith ML, Steinman LE, Casey EA. Combatting Social Isolation Among Older Adults in a Time of Physical Distancing: The COVID-19 Social Connectivity Paradox. *Front Public Health*. 2020 Jul 21;8:403. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7396644/>