November 19, 2021

Arthur Jemison
Principal Deputy Assistant Secretary
Community Planning and Development
US Department of Housing and Urban Development
451 7th St SW,
Washington, DC 20410

Dear Mr. Jemison:

On behalf of our 38 million members and all older Americans nationwide, AARP would like to thank you for the efforts to date by the U.S. Department of Housing and Urban Development (HUD) to include AARP among the stakeholder groups which you convene to share regular updates and collect input on a variety of issues that affect older Americans.

On November 4, 2021, HUD presented information pertaining to its notice of the allocation of more than $2 billion in CDBG-DR and CDBG-MIT to ten states, covering 15 recent major disasters. In that call, HUD presented information on its intention to create a “universal notice” that would serve to expedite future CDBG-DR and CDBG-MIT allocations, including but not limited to the additional $3 billion already appropriated in 2021 for disaster recovery and mitigation efforts.

AARP urges HUD to more explicitly consider the needs of older adults in its current and future implementation of disaster recovery and mitigation funds. Older adults are disproportionately impacted by disasters. For example:

- Older adults age 65+ made up 12 percent of the population of New Orleans when Hurricane Katrina struck in 2005, yet they accounted for 60 percent of storm-related deaths.
- When Hurricane Sandy ravaged communities from the Caribbean up to Canada in 2012, older adults age 65+ accounted for nearly half of those who died.
- In Northern California’s 2018 Camp Fire, five of the 77 dead were under age 50; six were 50 to 59, 19 were 60 to 69, and 47 were over 70.

Certainly, among the 15 recent major disasters covered by this allocation, older adults also represent a disproportionate share of those impacted – yet national data are sparse, and episodic, often derived by more local reporting. Still greater data collection and reporting is required to fully understand the disparate impact on communities of color, which may be more likely to reside in high-risk areas. AARP encourages HUD to require grantees to provide data related to
age, as well as racial and ethnic composition, for communities impacted by disasters, and those engaged in recovery and mitigation efforts.

It is already well documented that many older adults are low- and moderate-income, and thereby are one of the populations that HUD is charged to serve. The 2020 Profile of Older Adults report prepared by the Administration for Community Living (within HHS) states:

- “The median income of older persons (65+) in 2019 was $27,398.
- For all older persons (65+) reporting income in 2019 (52.8 million), 12% reported less than $10,000.
- In 2019, nearly one in ten people age 65 and older (8.9 percent or 4.9 million) lived below the poverty level.
- A higher percentage of older persons living alone were poor (16.1 percent) as compared with older persons living with families (5.3 percent).”

Moreover, older adults often live with disabilities or impairments to their full physical capabilities. In 2019, ACL data showed that 19 percent of adults age 65 and older reported they could not function at all within, or had a lot of difficulty with, at least one of six functioning domains.¹ As a result of COVID-19, ACL notes that there has also been an increase in older adults reporting symptoms of anxiety or depression.

For these reasons, AARP is focusing on how to reduce the risk to older adults presented by extreme weather and natural disasters. In 2020 and 2021, AARP joined with FEMA² to conduct research through a comprehensive literature review and more than a dozen in-depth interviews with leaders from the emergency management and aging advocacy disciplines. The purpose of the research was to better understand how to reduce the incidence of harm to older adults during disasters, and how to strengthen community-scale mitigation efforts that reduce risk to older adults. Those findings will be shared in two forthcoming complementary publications: a new FEMA Guide to Expanding Mitigation for Older Adults, and a complementary AARP Disaster Resilience Tool Kit (expected release date for both is January 2022).

While creating these resources, we have identified several strategies that we believe can improve the ability of older adults to safely withstand disasters in the future. Many of these are grounded in the ongoing work of AARP’s 53 state offices, and members of the AARP Network of Age-Friendly States and Communities. AARP encourages HUD to promote the following strategies through its implementation of the CDBG-DR and -MIT programs, and instruct grant recipients to:

¹ The six functioning domains are: hearing (even if wearing hearing aids), seeing (even if wearing glasses), mobility (walking or climbing stairs), ability to communicate (understanding or being understood by others), cognition (remembering or concentrating), and self-care (such as washing all over or dressing). Source: ACL 2020 Profile of Older Adults
² FEMA and AARP have collaborated since 2013, and now share a Memorandum of Understanding (dated 2019) to “cooperate to carry out their respective responsibilities... to prepare older adults with respect to disaster mitigation, preparedness, response and recovery operations in the event of ... disaster(s).
1. **Build stronger connections to and relationships with organizations that represent the needs of older adults.**

Experience shows that emergency management and disaster recovery agencies do not regularly work with entities that represent the needs of older adults. Far more effort is required to understand the needs of the vast majority of older adults, who live independently but lack adequate communication, transportation, or financial resources to effectively prepare for a disaster, much less respond to or recover from a disaster -- or mitigate risk for future disasters. Organizations that provide transportation to older adults (nearly 20 percent of people age 65+ do not drive at all) are an example of critical partners with which emergency managers should proactively engage and collaborate.

2. **Identify where older adults are and how to reach them.**

There is a poor level of understanding of where older adults reside, and how to best reach them. Research shows that 15 percent of people age 50 and over do not have access to the internet. Often, emergency plans limit their consideration to the logistical needs of those in nursing homes -- which account for only seven percent of people age 65+. Many older adults rely on landline phones, radio/TV, and newspapers for their news, which are increasingly becoming outdated methods of receiving breaking news alerts and emergency updates. For those who reside in nursing homes and congregate living facilities, emergency managers must ensure that adequate support and provisions are provided for residents, who often represent those in greatest need of care and medical attention.

3. **Recognize the diversity among older adults.**

Many older adults live with disabilities or impairments to their full physical capabilities. In 2019, 19 percent of adults age 65 and older reported they could not function at all or had difficulty with at least one of six functioning domains, presenting very real challenges for their ability to respond to high-risk conditions that emerge during a disaster. In 2019, 24 percent of persons age 65 and older were members of racial or ethnic minority populations, which require additional considerations in terms of language, culture, custom, and hesitancy when offered federal interventions. Collaboration with trusted, local, community-based groups who understand the needs of a diverse older population is critical.

4. **Be mindful of response and relocation risks.**

There is ongoing debate as to whether and when older Americans should relocate during disasters. Many older adults have experienced past disasters and may have a sense that they can withstand future disasters. Therefore, they are often unwilling to relocate in the face of future risk. For some, the risk of relocation -- and separation from needed in-

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3 Examples of organizations that broadly represent the interests of older adults include communities that are members of the AARP Network of Age-Friendly States and Communities, AARP state offices, area agencies on aging, in-home care providers, and more. Organizations that provide transportation to older adults can include transit agencies, paratransit operators, and volunteer driver programs.
home medical equipment, or beloved pets, or caregivers – outweighs the risk of sheltering in place. For those older adults who are relocated (temporarily or permanently), long-lasting physical, emotional and mental trauma often follows, compounding existing health concerns. Many older adults lack the financial resources to relocate, either temporarily or permanently, particularly those living on a fixed income with little or no savings. And yet, sheltering in place and the disruption to essential power supplies, fresh food and clean water also carries significant risk.

5. **Strengthen community-wide infrastructure.**
Communities can and must invest in more reliable and accessible solutions that reduce the risk posed to older adults during times of disaster. Solutions can include but aren’t limited to: expanded high-speed internet access, increased transportation options (including for those who have disabilities), improved parks and public spaces (to absorb stormwater, increase cooling, and provide safe harbor), investments to harden or relocate homes in high-risk areas, and more resilient power systems that can withstand extreme weather.

We appreciate your consideration of this very important topic and look forward to providing support in any way we can to ensure the effective deployment of these funds in ways that best serve the needs of older adults. For further information, please do not hesitate to contact Debra Alvarez, Senior Legislative Representative (dalvarez@aarp.org).

Sincerely,

David Certner
Legislative Counsel and Legislative Policy Director
Government Affairs