



Via Electronic Submission

November 30, 2022

Alison Barkoff
Acting Administrator and Assistant Secretary for Aging
Administration for Community Living
330 C Street, SW
Washington, DC 20201

Re: HCAOA Response to ACL's 2022 National Strategy to Support Family Caregivers

Dear Ms. Barkoff,

The Home Care Association of America ("HCAOA") respectfully submits these comments to the Administration for Community Living's (ACL) recently released National Strategy to Support Family Caregivers found here. The following comments are responsive to questions that can be [found here](#). An abbreviated version of these comments was submitted through ACL's online portal.

Question 1: Within this component of the strategy, what are the three most important topics/issue for the Advisory Councils to focus on moving forward?

The Home Care Association of America ("HCAOA") is the home care industry's leading trade association. We currently represent over 4,200 companies that employ nearly two million caregivers across the country. We are truly appreciative of the opportunity to comment on ACL's 2022 National Strategy to Support Family Caregivers.

HCAOA believes that the three most important topics the Advisory Councils should address are:

- 1) supporting and actively engaging family caregivers in care planning,
- 2) lessening the financial strain of family-funded home care, and
- 3) strengthening the role of direct care workers in providing long term services and supports.

ACL has HCAOA's full support in executing its National Strategy to Support Family Caregivers. Home care agencies, more than any other health care provider, must develop strong ties with family caregivers because the majority of in-home care is not 24/7. When an engaged family caregiver is working with a professional caregiver, the patient/client experience is greatly enhanced, making all parties involved feel more fulfilled and valued.



In coordination with the release of ACL's National Strategy to Support Family Caregivers, HCAOA established the *National Caregivers Advisory Council*, which seeks to explore issues affecting the one-to-one care received in one's own home and how both family caregivers and professional caregivers can improve the care of a loved one. The Council will address many issues raised in the national strategy.

Supporting and Actively Engaging Family Caregivers in Care Planning

Planning and saving for future long-term care needs will require multiple options, based on one's ability to save and projected care needs. Saving for care in old age should be as top-of-mind as saving for education when a child is born. Government and private-sector stakeholders must make financing for care a priority and develop a suite of options to fit the diverse financial and care needs of older Americans.

There are also emotional components to creating a successful home care experience. Families of the patient/client must be included in all facets of the care plan. Both the patient/client and the family caregiver should feel free to express their needs, wants, and expectations. Once a home care agency is chosen by the client and family, the agency should have a discussion regarding what the client needs and wants and how the professional caregiver can provide that in conjunction with the family caregiver. Clear expectations and open dialogue must start immediately.

Lessening the Financial Strain of Family-Funded Home Care

HCAOA has been engaging in a dialogue with Congress and the Biden Administration on a range of options to lessen the financial burden of long-term services. These include, but are not limited to, a tax credit for caring for seniors, expansion of eligibility for Medicaid home and community-based care, expanding health savings accounts to cover home care expenses, allowing individual retirement funds to pay premiums for LTC insurance, and establishing a benefit under Medicare for home care costs beyond the existing supplemental benefit under Medicare Advantage plans.

Long-term care – which 70 percent of adults 65 and older will require at some point – costs \$55,000 annually for 44 hours per week of home care compared to more than \$93,000 per year for nursing home or assisted living care.

Seventeen percent of people 65 and up have less than \$5,000 saved for retirement. Among elderly Social Security beneficiaries, 21 percent of married couples and 45 percent of single people rely on Social Security for 90 percent or more of their income. By 2029, 54 percent of the 14.4 million middle-income seniors will have insufficient resources to pay for care.



A recent Milken Institute analysis found that individuals and families pay 52 percent of all long-term care (LTC) costs out of pocket. Medicaid pays for nearly 34 percent, primarily for low-income people or those who spend down their assets to qualify for coverage. Private LTC insurance covers less than 3 percent. The financial burden of caring for our aging population—on individuals, families, and our society/economy—is simply unsustainable on today’s payment model.

Strengthening the Role of Direct Care Workers in Providing Long Term Services and Supports

Many family caregivers are under severe stress, especially those in the “sandwich generation,” who must balance the demands of raising children and caring for aging loved ones. The COVID-19 pandemic has only deepened that stress. Direct care workers were unquestionable among the heroines of the pandemic, aiding family caregivers in their efforts to support loved ones.

It takes a special kind of person to be a caregiver. When asked why they joined the profession, more than 88 percent of caregivers cited a desire to help people. High-performing caregivers bring a unique mix of skills to the job, including patience, empathy, dependability, flexibility, trustworthiness, compassion, rapport, enthusiasm, and exceptional communications skills.

Yet society often fails to adequately value these skills, leading to a lack of public recognition and respect for caregiving as a profession. The demographic makeup of this workforce also lends itself to stereotypical misperceptions of the skills and value of the workforce. Nearly one-third of home care workers were born outside the U.S. By comparison, people born outside the U.S. make up less than 15 percent of the total population.

Reversing misguided perceptions starts with paying caregivers commensurate with the value they provide. Across the U.S., about 40 percent of agencies are now offering sign-on bonuses, and 94 percent have increased pay, some by as much as \$10 or more an hour based on experience. One company that provides payroll services to many home care organizations across the U.S. reports that the average wage for direct care workers has increased by 20 percent since the pandemic. Yet more must be done to elevate the profession of caregiving that ultimately supplements family care.

Question 2: Are there issues that are not covered in this component that should be addressed in future updates?

One issue that is critical to the future of caregiving is the absence of national care standards, which HCAOA feels minimizes the importance of the sector. Strong standards – including both state oversight and national standards – are essential to elevating the home care industry and raising



public perceptions of caregiving, while also helping to ensure care recipients get the highest quality of care.

Standards to emphasize caregiver training and employer expectations can also elevate work performed in this field, helping to promote compensation commensurate with the value of the services caregivers provide.

Another issue that is essential to explore in greater detail is the aging population in the U.S. and its impact on the supply of the direct care workforce. HCAOA has been actively engaging with lawmakers regarding the need for a temporary visa program focused on the caregiving needs of seniors and individuals with disabilities. Draft legislation HCAOA has created with several partners would establish a new H-2C visa category allowing for as many as 85,000 additional caregivers annually.

HCAOA has also established the Home Care Workforce Action Alliance with the National Home Care and Hospice Association to offer concrete recommendations to address the workforce shortage in home care. This report will be released in early 2023 and will outline action steps focused on wage and benefits, recruitment and training, and elevating the profession.

The industry is expected to see a 34 percent increase in the demand for workers over the next decade. This projection is due to the fact that the U.S. Census Bureau expects the American senior population to increase from 42 million to 84 million by 2050.

In a March, 2022 report on State Efforts to Address Medicaid Home- and Community-Based Services Workforce Shortages, the Medicaid Advisory and Chip Payment Access Commission (MACPAC) stated that, “...*there is evidence that an insufficient supply of HCBS workers has led to providers being unable to take on new clients, vacancies in the workforce, and unmet beneficiary need. A 2021 survey of HCBS agencies found that 77 percent have turned away new referrals, 58 percent have discontinued certain programs or services, and 84 percent have delayed programs due to staffing shortages (ANCOR 2021).*”

Immigrants currently provide 28 percent of home care in the United States, despite the fact that they make up a much smaller percentage of the total population. Immigrants working in home care tend to work nontraditional shifts that are often difficult to fill while also providing linguistic and cultural diversity to address the increased diversity in the United States population.

HCAOA would welcome further discussions on this type of initiative to address caregiving needs in our nation today and in the future.



HCAOA will also continue its strong federal and state advocacy efforts in support of areas outlined in the [2022 State of Home Care: Industry at a Crossroads](#) report, which calls on home care industry leaders and policymakers to unite around initiatives that address the rapidly growing demand for care and to help Americans age in their own homes with comfort, safety, and independence.

HCAOA appreciates that ACL has prioritized increased engagement with its partners and the communities it serves throughout the policy development and implementation process. HCAOA wishes to increase its engagement with ACL and believes we can provide meaningful feedback on a number of different issues currently facing the home care industry.

Thank you for your consideration of our submission. Please know that our association is always here to assist ACL in any way possible. Feel free to contact me at vicki@hcaoa.org or our Vice President of Government Relations, Eric Reinerman, at eric@hcaoa.org, with any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Vicki Hoak". The signature is written in a cursive, flowing style.

Vicki Hoak, CEO
Home Care Association of America