



October 15, 2024

Submitted Electronically: [heatchecklist@who.eop.gov](mailto:heatchecklist@who.eop.gov)

RE: White House Extreme Heat Summit Call for Comment on: Community Heat Action Checklist

Dear National Climate Advisor Zaidi,

LeadingAge appreciates the opportunity to submit comments to the White House on the Community Heat Action Checklist. The checklist is a valuable opening roadmap for communities beginning to look at ways to keep residents safe during extreme heat events, and yet more attention is needed on older adults and providers that serve and house them.

It is critically important that older adults and the providers that serve them are considered and consulted as key partners in driving community safety and resilience, including related to extreme heat. And, as communities assess the vulnerabilities of older adults to heat in their geographies, we hope opportunities will arise to support heat resilience through programs that support retrofitting existing buildings with more efficient and resilient features.

Overall, we applaud the administration's attention to extreme heat and urge additional emphasis on the increased risks faced by older adults and the providers that serve them.

#### **About LeadingAge**

The mission of LeadingAge is to be the trusted voice for aging. We represent more than 5,000 mission driven aging services providers that touch millions of lives every day. Alongside our members and 38 state partners, we use applied research, advocacy, education, and community-building to make America a better place to grow old. Our membership encompasses the entire continuum of aging services. We bring together the most inventive minds to lead and innovate solutions that support older adults wherever they call home.

Extreme heat kills more people than any other weather-related hazard, and older adults are at heightened risk. As we continue to think about checklists that can make the largest impact for people most at risk for adverse outcomes related to heat, it is important to ensure the checklists don't inadvertently leave out older adults.

We recommend following key principles to elevate the needs of at-risk and marginalized people in planning, preparing, and responding to a heat crisis:

- Target and consult with vulnerable populations like older adults
- Partner with providers that serve older adults like assisted living, adult day, housing, nursing homes, home health, hospice, and senior centers
- Prioritize thoughtful strategies to communicate both with people that have limited English Proficiency or limited access to cellular phones, social media, or the internet like older adults,

- Proactively engage in thoughtful transportation plans and solutions for individuals with limited mobility

Please find specific comments on the Community Heat Action Checklist by sub-heading below; these include areas where we recommend stronger language and attention to older adults in various settings.

#### *Internal Planning*

We recommend including explicit parameters of what may constitute a “heat island” and include specific at-risk populations in the list of “neighborhoods which may need extra help.” This should include, for example, affordable senior housing properties that have a high concentration of multifamily units without consistent or affordable access to air conditioning (and often without access to backup power during planned or emergency power outages).

We also recommend that the checklist specifically elevate the need to engage with community health providers such as adult day providers, home health and hospice providers, nursing homes, assisted living facilities, and community-based services providers that help people remain in their homes. Community health and services providers may be the primary or singular access point that older and home-bound adults have to the outside world, therefore serving as the best vehicle for support during extreme heat events.

#### *Public Awareness*

We recommend adding specific actions that illustrate the need to do targeted information sharing, education, and outreach to providers that serve people particularly vulnerable to extreme heat, like older adults. Organizations would include adult day services providers, senior housing providers, nursing facilities, assisted living facilities, and specialist physicians serving high proportions of older adults like cardiologists, geriatricians, and neurologists.

Ensure that information about ‘energy assistance’ and LIHEAP is inclusive of support for energy used to run cooling devices in the summer, not just heating in the winter, which is how some states are marketing the program. The checklist should also expand the examples of housing partners beyond HOAs and other home owner-directed messaging to include renters and multifamily housing; this should include Service Coordinators and other property staff at federally-subsidized housing communities. For example, many affordable senior housing communities utilize their common spaces as informal cooling centers for their residents, incurring expensive energy bills to make sure their residents are safe. In addition, staff in senior living often work with residents to make sure they are utilizing energy cost discounts that may be available to them. Municipalities should be directed to partner with the multifamily housing providers in their area to make sure each community is prepared and supported.

Lastly, public awareness should include targeted education campaigns that reach older adults using media and strategies that are comfortable and consumable for various generations. The campaigns should help people understand how they might be vulnerable to extreme heat, what the health impacts of extreme heat look like, what resources exist, how to best utilize resources available to them, and who they can contact for more information.

#### *Preparing Infrastructure and Resources*

The mention of senior living and housing in this section is appreciated, and we recommend expanding the “public housing” reference to the more inclusive term of federally-subsidized housing.

In addition to the steps outlined in the checklist, communities need to take additional steps to work with providers serving older adults to ensure safety where they live. Many older adults in federally-subsidized senior housing or who are receiving services in their homes may have mobility challenges or resource limitations, making it difficult for them to secure transport to a cooling center.

Municipalities should consider developing strategies and policies to ensure cooling (and communication about cooling resources) is available where older adults live; this can include individual assistance, like providing cooling devices to people unable to leave their homes, and also more systemic approaches, like establishing or earmarking funds to pay for home modifications or infrastructure improvements, like central air, backup generator installation, or more efficient utilities that reduce energy consumption on the grid.

We also recommend considering ways for community leaders and providers to seek additional support so that a “heat vulnerability index” could be mapped out in advance of heat season, both at individual and community levels. This would include the development of a feedback or inquiry portal that allows providers to request cooling support and information sharing. An example may include during an extreme heat event that causes a utilities blackout. An affordable housing provider that doesn’t have back-up power generators may need temporary power for refrigeration for resident medications or help transporting or evacuating residents with mobility limitations that may need an elevator from floors above ground level. Ways to support individuals remaining in their homes will mitigate stresses on emergency response and departments.

### *Section 2: Before an Extreme Heat Event*

Consider adding a qualifier to the heading to indicate that this is an activation phase immediately preceding an extreme heat event, as reflected in the sub header. In addition, we recommend incorporating suggestions from above related to public awareness and individual education campaigns when a heat event is imminent. We also caution against oversights that happen as strategies to communicate rely on social media or internet connectivity and forget strategies to contact home-bound, mobility-challenged, or technology-limited individuals. Communication strategies should also include outreach preparation for people with limited English proficiency and different cultural backgrounds.

### *Section 3: During an Extreme Heat Event*

Provide additional information on the infrastructure improvements that allow community providers to seek additional support for cooling, evacuation, or temporary power in a rapid response loop.

### *Points of Contact*

We recommend expanding the list of suggested points of contact to include providers serving at-risk people, like senior living communities and services providers, so that municipalities are prompted to expand their network of resources.

### *After a Heat Event*

We recommend adding a section to the checklist that encourages learning from experiences of extreme heat. Communities should consider debriefing on timing and effectiveness of operations by assessing, among other things:

- Community engagement in protecting residents and vulnerable populations from adverse outcomes caused by the extreme heat event,
- Whether particular sectors of the population experienced adverse outcomes,
- What steps could mitigate future harm to populations that experienced harm, and

- Community partner and provider feedback on process improvements.

LeadingAge appreciates the opportunity to provide feedback on the proposed checklist. We continue to advocate that providers of aging services are tremendous resources in mitigating risks associated with extreme heat for older adults. Local municipalities should partner with community organizations providing services to older adults to be better prepared when extreme heat overtakes a community.

We look forward to continuing to work together to advance climate resilience solutions for older adults.

Sincerely,



Georgia Goodman  
Director, Medicaid Policy  
LeadingAge