



**NATIONAL ASSOCIATION  
OF STATE HEAD INJURY  
ADMINISTRATORS**

June 6, 2022

Alison Barkoff  
Acting Assistant Secretary for Aging and  
Administrator of the Administration for Community Living  
330 C St., SW  
Washington, DC 20201

Re: RFI: OAA Regulations Title III

Dear Ms. Barkoff,

The National Association of State Head Injury Administrators (NASHIA) is responding to the request of the Administration for Community Living (ACL) to gather feedback on recommended changes, additions, or deletions to regulations for programs authorized under Titles III of the Older Americans Act, [42 U.S.C. 3001](#) *et seq.* The reauthorization included a definition for traumatic brain injury (TBI) in Title I of the Act, and subsequently, in Title III, added Section 302: Public Awareness of Traumatic Brain Injury that allows projects that address traumatic brain injury among older adults to be included in authorized grant programs.

NASHIA, therefore, recommends that Section 302 be added to the regulations in keeping with the law and its intent. Congress added this provision, as well as other provisions relating to screening in other Titles of the law, in recognition that adults aged 75 and older have the highest rates of TBI-related hospitalization and death. Falls are the leading cause of TBI for older adults. TBI diagnosis is challenging as symptoms are similar to other conditions, such as stroke, dehydration and dementia, while at the same time, these types of medical conditions may contribute to the fall-related TBI.

Under-identification of TBI leads to poor management of conditions related to TBI. Researchers have suggested that emergency medical service providers, clinicians, other aging providers and families interacting with older adults be better trained to recognize symptoms and treat accordingly. Section 302 is a first step in promoting awareness as to the likelihood of a TBI following a fall; signs to look for after a fall; and recommendations for proceeding accordingly for treatment.

We are pleased that Congress included provisions for public education, health promotion and screening in the 2020 OAA reauthorization. Please do not hesitate to contact NASHIA if we can be of assistance.

Sincerely,

Rebeccah Wolfkiel  
Executive Director

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*Assisting State government in promoting partnerships and building systems to meet the needs of individuals with brain injury and their families.*