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Lorraine Cortés-Vázquez Commissioner New York City (NYC) Department for the Aging 2 Lafayette Street, 5th Floor New York, NY 10007

Subject: Request for Inclusion of Social Adult Day Care (SADC) Programs in NYC Emergency Planning and Advance Warning System (AWS) Alerts

Dear Commissioner Cortés-Vázquez:

On behalf of the SADC community across NYC, the New York State Adult Day Services Association (NYSADSA) respectfully urge the NYC Department for the Aging to formally include SADC programs in the City's emergency planning protocols and communication systems, specifically by incorporating them into the AWS for timely emergency alerts.

As of today, there are approximately 400 SADC programs in NYC, serving tens of thousands of older adults with physical, cognitive, and psychosocial impairments. Many of these programs are linguistically and culturally aligned with their communities, providing critical care and social engagement for some of the city's most vulnerable residents. Each SADC program is registered with NYC Aging and licensed by the NYC Department of Health and Mental Hygiene through a food service permit, forming an extensive, coordinated infrastructure that can be leveraged during emergencies.

The lessons of the COVID-19 Public Health Emergency emphasized the need for improved emergency communications. Many SADC participants and their families did not receive vital health or safety information promptly—particularly in their primary language—highlighting a gap in public communication outreach that must be addressed. It is important to add that SADC programs are funded under the New York State Department of Health but are not included in the Health Commerce System Emergency Planning.

We believe that integrating SADC programs into the AWS can directly address this concern. The AWS provides organizations serving people with disabilities and functional needs with early alerts for emergencies that may disrupt daily life and independence. Including SADC programs will help ensure the rapid, localized dissemination of emergency information in over 400 community-based settings, empowering staff to communicate effectively with tens of thousands of participants and caregivers in multiple languages.

Moreover, the New York State Master Plan for Aging explicitly underscores the importance of equity, community integration, and the development of inclusive emergency preparedness

systems. It emphasizes that emergency planning should be community-based, culturally responsive, and linguistically accessible, especially for populations aging in place.

Additionally, Title 9 New York Codes, Rules, and Regulations (NYCRR) § 6654.20 establishes minimum statewide requirements for the administration and operation of SADC programs, including emergency planning. These standards are now incorporated and enforced locally under 69 Rules of the City of New York § 2-22, which includes civil penalties for failures in emergency preparedness policies (e.g., 9 NYCRR § 6654.20(d)(2)(i)(i)).

Therefore, we respectfully recommend:

- Inclusion of SADC programs in the AWS alert network.
- Targeted outreach regarding AWS registration for all SADC programs through the NYC SADC Ombuds email alert and website.
- Collaboration with the SADC Ombudsperson to ensure compliance with Title 9 emergency preparedness expectations.
- Inclusion of SADC programs in all future NYC emergency planning meetings and updates.

If bulk registration is not available through the AWS, we recommend that the SADC Ombudsperson leverage their existing email contact lists to distribute registration links and instructions so that programs can self-enroll. Additionally, AWS registration guidance can be posted on the NYC Aging website under the SADC Ombudsman section, consistent with Title 9 NYCRR § 6654.20(d)(2)(i), which requires programs to maintain written emergency procedures and participate in planning to ensure the health and safety of participants.

SADC programs are trusted, frontline community hubs. Integrating them into NYC's emergency communication infrastructure will ensure that tens of thousands of older adults receive timely, clear, and accessible alerts in future emergencies.

We appreciate your leadership and partnership in supporting older New Yorkers and look forward to collaborating to strengthen the City's emergency preparedness.

Respectfully,

Yvonne Ward, CHC

Consultant NYSADSA

cc: Lenny James, NYC Aging
Suzanne Miles-Gustave, NYC Mayor's Office
NYC Aging, SADC Ombuds Office