

JUSTICE IN AGING

FIGHTING SENIOR POVERTY THROUGH LAW

September 24, 2025

Via Email to RacialEquityCommisson@lci.ca.gov

Racial Equity Commission
c/o Commission Members
c/o Commission Staff

Re: Comment Letter – Draft Racial Equity Framework

Dear Racial Equity Commission:

Thank you for the opportunity to comment on the Racial Equity Framework (REF) draft developed by California’s Racial Equity Commission (REC). Justice in Aging respectfully submits this comment letter. We encourage the REC to consider adding another comment period before the December 1, 2025, deadline.

Justice in Aging is a national legal advocacy organization with the mission of improving the lives of low-income older adults. We use the power of law to fight senior poverty by securing access to affordable healthcare, housing, and economic security for older adults with limited resources. We possess extensive expertise in federal and state programs that low-income older adults rely on and are intricately involved in the implementation of California’s Master Plan on Aging (MPA). We focus our efforts primarily on fighting for older adults who have been marginalized and excluded from justice, such as women, people of color, LGBTQ+ individuals, and people with limited English proficiency.

We appreciate the REC’s efforts allowing stakeholders to support the development of a statewide REF. As we set forth in a letter to the REC dated February 12, 2025, it is critical to ensure that the final framework addresses the unique needs of California’s older adults of color.¹ In order to accomplish the REC’s goal of recommending best practices and opportunities to address racial equity, we urge the REC to recommend a REF that addresses and highlights intersectional discrimination against the state’s older adults and disabled people of color.² We applaud the work it takes to create the REF, but we urge for greater consideration of older adults in the framework.

A REF that elevates the intersection of aging and disability would increase visibility to the unique effects of discrimination on older adults of color. Older adults face unique health, disability, and financial security challenges due to lifelong social and economic factors that lead to disparities in later life outcomes. California’s life expectancy in 2022 was 81.1 years, but only 74.6 for Black, 76.4 for Native Hawaiian and Pacific Islander, and 78.1 for American Indian and Alaska Native.³ While everyone ages, race significantly impacts older adults’ lived experience.

¹ 23 Organizations advocate for older adults, [Comment Letter regarding Racial Equity Framework](#) (Feb 12, 2025).

² [Cal. Exec. Order No. N-16-22](#) (mandating state entities to embed and institutionalize racial equity strategies across their policies, programs, and initiatives).

³ [Health Disparities by Race and Ethnicity in California: 2024 Edition](#), California Health Care Foundation (May 2024).



Black older adults are 18.8 % of those aged 65 and above living below the poverty line, while white older adults account for 9.8% in California.⁴ These disparities are only resolved when the REF asks state government to prioritize older adults.

Opportunities for Improving the REF to Ensure Older Adults Are Included

We appreciate that the REF draft highlights the efforts of the California Department of Aging (CDA)’s advisory body, the Equity Advisory Committee on Aging and Disability (EACAD). The emphasis in the context of a section about General Best Practices and Rules for Creating an Accessible Document is needed to include all older adults.⁵ This initiative represents a promising step towards fostering inclusivity across the aging population and individuals with disabilities. However, we also hope that the framework will leverage the expertise of the aging leaders to support the guidance of the REF. It is imperative to acknowledge that by 2040, the proportion of Californians aged 65 and above will increase to 22 percent, from 14 percent in 2020.⁶ It is projected by 2030, Latino and Asian older adult populations are growing the fastest.⁷ The input from aging advocates in collaboration with the REC will guide a shifting dynamic within the state regarding the older adults of color population.

We commend your efforts to engage subject matter experts in shaping the REF and urge sustained collaboration to ensure effective implementation. Executive Order N-16-22 empowers the REC to work with advisers or advisory committees whenever the commission decides their experience or knowledge is needed.⁸ The work with the Office of Community Partnerships and Strategic Communications provided insights on timely, accurate, accessible, and culturally appropriate messaging. We see similar opportunities as highlighted in previous comments for the REC to take coordinated action with the California Department of Aging.⁹ The development of the REC’s REF in coordination with the MPA allows for California to be both an anti-racist and pro-aging and disability state. The MPA is a statewide blueprint to promote the health, well-being, and equity of older adults and people with disabilities, guiding public and private efforts to meet the state’s changing demographics.¹⁰ The MPA Initiative 52 sets forth to “Ensure people of color, both older adults and people with disabilities, are represented as a population of focus in the Racial Equity Framework, through the work of the California Racial Equity Commission.”¹¹ As currently drafted, the framework does not acknowledge this beyond EACAD.

The REC took intentional steps to engage with the community and coordinate efforts, but while strong organizational strategies and methodologies are important, lasting impact depends on deliberate implementation. Executive Order N-16-22 empowers the REC to develop

⁴ [Poverty Racial Disparity - Age 65+ in California](#), Americas Health Rankings (last visited Sep. 22, 2025).

⁵ [Draft Racial Equity Toolbox](#), California Racial Equity Commission (last visited Sep. 17, 2025).

⁶ Hans Johnson, Eric McGhee, Paulette Cha, and Shannon McConville, [California’s Aging Population](#), (Jan. 2025).

⁷ Hans Johnson and Laurel Beck, [Planning for California’s Growing Senior Population](#), Public Policy Institute of California (Aug. 2015).

⁸ [Cal. Exec. Order No. N-16-22](#) (mandating state entities to embed and institutionalize racial equity strategies across their policies, programs, and initiatives).

⁹ 23 Organizations advocate for older adults, [Comment Letter regarding Racial Equity Framework](#) (Feb. 12, 2025).

¹⁰ [Master Plan for Aging Home Page](#), [Master Plan for Aging](#) (last visited Sep. 22, 2025).

¹¹ [California’s Master Plan FOR AGING 2025-26 INITIATIVES](#), 4 Master Plan on Aging 2025-26 Initiatives, 3, 3 (2025) (explains all 81 initiatives and further shows the continued efforts for older adults and aging community).

methodologies and tools that can be employed in California to advance racial equity and address structural racism.¹² We hope the REC will emphasize the necessity of incorporating older adults into the current materials. This lack of emphasis is especially concerning given the robust nature of the documents that the REC has currently released, which include a 57-page REF, a 248-page Draft Racial Equity Toolbox (RET), and various QR codes and links. Even after navigating all of this, the inequities that older Californians of color experience are overlooked. The REF offers valuable insight into REC's process and lessons learned, though it serves more as a case study than a fully developed standalone tool for broader application. On September 17th, Commissioner Maldonado underscored the imperative to revamp the REF, and presented practical examples of actions the REC could undertake to enhance readability and accessibility for the benefit of government employees.¹³

The REC has an opportunity to advance equity for older adults by leading with data informed principles proposed within the REF. The REC's efforts to highlight the importance of both quantitative and qualitative data is valuable. However, state entities looking to implement the framework will need clear guidance on what specific steps are for intersectional data collection to effectively advance equity within California. By 2030, over 10 million Californians will be 60+, with about 5% identifying as LGBTQIA+.¹⁴ For LGBTQ+ older adults who belong to other historically marginalized communities, systemic inequities can be compounded or unique. Yet, little is known about their health and well-being. SOGI data for older adults is crucial for ensuring the visibility and recognition of LGBTQ+ individuals' unique challenges within the REF. Collecting SOGI data for older adults is essential to understand how sexual and gender identity intersect with age, race, and income which shape unique health, social, and economic challenges. Without it, the needs of LGBTQIA+ elders often remain invisible in policy and care. LGBTQ+ individuals disproportionately live in poverty and receive SNAP benefits at twice the rate of non-LGBTQ+ people.¹⁵ Accurate SOGI data empowers policymakers to develop targeted and effective programs that address disparities and foster inclusion.¹⁶ Naming the need for SOGI older adult data collection within the REF will achieve genuine equity for an often-forgotten community and can inform a blueprint for intersectional matters.

Process Recommendations for Older Adult REF Development

We appreciate the Commissioners and staff who laid the groundwork for the draft framework. The REC heard from engaged residents in urban and suburban areas like Fresno, Sacramento, Oakland, Martinez, Los Angeles, Riverside, Antelope Valley and tribal elders in Klamath River. The conversations are instrumental for a REF that supports all Californians. However, we are missing the collective voices of older adults in the current iteration of the REF. We hope you consider offering a second comment period before the December 1, 2025, deadline and use the review period to make necessary improvements for equitable options for older adults of color.

¹² [*Cal. Exec. Order No. N-16-22*](#) (mandating state entities to embed and institutionalize racial equity strategies across their policies, programs, and initiatives).

¹³ California Racial Equity Commission, [Racial Equity Commission Meeting](#), YouTube (Sep. 17, 2025).

¹⁴ California Department of Aging, [Survey of LGBTQIA+ Older Adults in California: From Challenges to Resilience Summary Document](#) 2 (2024).

¹⁵ Denny Chan and Sahar Takshi, [Supporting LGBTQ+ Older Adults' Basic Needs](#), Justice in Aging (Sep. 18, 2025).

¹⁶ California Department of Aging, [Survey of LGBTQIA+ Older Adults in California: From Challenges to Resilience Summary Document](#) 2 (2024).

We value the commitment and support shown for the processes in place for community participation, which fueled an ambitious and intentional crafted outreach effort by the REC to include diverse voices. The thoughtful visit by Dr. Estes and Commissioner Wright allowed the Sankofa Elders Project to share their lived experiences and deepen the REC's understanding of the Black Eldering Bill of Rights. The Black Eldering Bill of Rights is a community manifesto for the care and belonging of Black elders in Los Angeles County.¹⁷ Sankofa empowers Black elders to identify and advocate for community solutions to health disparities in their lives, families, neighborhoods, and communities.¹⁸ We hope the REF includes the learning from the visit with the Sankofa Elders Project in the framework. The Sankofa Elders Project offers valuable lessons on the broader supports needed to serve Black older adult populations.

Over 9 million Californians are over 60, and by 2030, they will outnumber those under 18 for the first time.¹⁹ By 2040, older adults of color will outnumber White older adults, reshaping the racial and ethnic makeup of California's aging population.²⁰ A key component of Executive Order N-16-22 is to engage, collaborate, and consult with policy experts to conduct analyses and develop tools, including by building on and collaborating with existing bodies, as appropriate.²¹ In the spirit of the directive, I hope you consider our February 12, 2025 comment letter suggestion to (1) meet with the California Department of Aging and relevant advisory groups for the MPA with expertise on equity and aging, and (2) ensure coordination between these two efforts and strategize how best to advance race equity for older Californians of color and people with disabilities of color.²² Over the next 2 years, California will advance 81 MPA initiatives leading with equity, community engagement, innovation and delivering results.²³ The REF and MPA for optimal results should work in tandem. To further emphasize this point, we ask before final publication, the REC and staff meet with aging advocates and staff from California Department of Aging.²⁴

Community written input plays a key role in building trust through shared experience and open communication from those most impacted. The REF was released on September 8, 2025. This was a monumental occasion to appreciate, critically review, and engage in the comment process for collaborative support. The toolkit highlights the REC's intention for a 30-day public comment period for community residents, organizations, and others with a vested interest to review and provide holistic comments on a fully drafted REF.²⁵ However, the community received a truncated 17-day comment period. This comment period gives the public a chance to review proposed plans, examine the culmination of months of input, and offer suggestions. Constituents, including older adults who expressed their inability to attend meetings during the

¹⁷ [Sankofa ECO-Group](#), California Black Women's Health Project, (last visited Sep. 17, 2024).

¹⁸ [Sankofa ECO-Group](#), California Black Women's Health Project, (last visited Sep. 17, 2024).

¹⁹ California Department of Aging, [Fact Sheet Older Adult Demographics](#) 1(2024).

²⁰ California Department of Aging, [Fact Sheet Older Adult Demographics](#) 1(2024).

²¹ *Ca. Exec. Order No. N-16-22* Sec. 8.g.ii ("The commission shall have the authority to: engage with advisers or advisory committees when the commission determines that the experience or expertise of advisers or advisory committees is needed for commission work").

²² 23 Organizations advocate for older adults, [Comment Letter regarding Racial Equity Framework](#) (Feb 12, 2025).

²³ "[California's Master Plan FOR AGING 2025-26 INITIATIVES](#)," 4 Master Plan on Aging 2025-26 Initiatives, 3,3(2025) (explains all 81 initiatives and further shows the continued efforts for older adults and aging community).

²⁴ 23 Organizations advocate for older adults, [Comment Letter regarding Racial Equity Framework](#) (Feb. 12, 2025).

²⁵ [Draft Racial Equity Toolbox](#), California Racial Equity Commission (last visited Sep. 17, 2025).

week, may only have a 4-day period to submit comments. Public comment opportunities strengthen the final framework.

We thank you for the steadfast efforts to complete the mandate to publish a REF by Dec 1, 2025. With the current timeline, the REC has time to include review of another public comment period, the revision of a 2nd draft REF period, and subsequent community engagement, ensuring that the process is completed in advance of the December 1, 2025, deadline. We encourage the REC to consider an additional comment period following the close of the initial public comment period on September 24, 2025, during which the REC would have 17 days through October 10 to provide further input. This review period should focus on identifying key themes, recommendations, and concerns raised by stakeholders. Immediately after, beginning on October 11, a second draft of the REF could be released for a 30-day public comment period, concluding on November 9, 2025. This extended comment window will allow community members, organizations, and advocacy groups to provide feedback on the revised content and proposed strategies for the original expected 30-day comment period. Once the second comment period ends, the REC will have a 21-day turnaround, from November 10 to November 30, to finalize revisions and prepare the REF for release. This timeline ensures that the final version is completed and ready ahead of the December 1st deadline, while also maintaining a commitment to transparency, thoughtful review, and meaningful public engagement. We anticipate further revisions to foster a unified voice that encompasses innovative strategies and the perspectives of older adults.²⁶

Conclusion

In closing, we continue to appreciate the thoughtful consideration the REC already demonstrated and the opportunities for public input and engagement during this process. We continue to uplift Commissioner Salas's inquiry about the representation of older adults in future data for a more inclusively designed REF that accounts for older Californians of color. We are encouraged by participants' highlights from the Virtual Roadshow, which showcased the need to uplift the voices of older adults and youth to ensure equal representation. We commend the REC's engaging approach and look forward to working with you to ensure the adoption of a meaningful REF that advances equity for all Californians, including older adults and people with disabilities.

Thank you for the opportunity to comment on the proposed REF. If any questions arise concerning this submission, please contact Archie Roundtree Jr. at aroundtree@justiceinaging.org.

Sincerely,



Denny Chan
Managing Director, Equity Advocacy

²⁶ American Society on Aging, [Breaking Down Barriers Between Age Groups](#) 3 (2025).