

August 2016

Report and Recommendations: Fighting Elder Financial Exploitation through Community Networks

Office for Older Americans

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Executive Summary

The widespread prevalence of elder financial exploitation destroys the financial security of millions of older Americans annually. In response to this crisis, hundreds of communities across the United States have created collaborative networks to protect their older residents. These networks, which often bring together key community stakeholders and resources, engage in varied activities designed to prevent, detect, and respond to elder financial exploitation.

To increase our understanding of how elder financial protection networks can grow and endure, the Consumer Financial Protection Bureau (CFPB) conducted research nationwide. With the help of the Federal Research Division of the Library of Congress, we attended network meetings and interviewed representatives from 23 elder protection networks and various experts in the field. Our inquiries focused on networks' objectives, structure, leadership, funding, members, activities and challenges. In addition, we conducted a quantitative analysis to examine networks' presence in communities across the United States. This report presents CFPB's recommendations to existing networks and key stakeholders to develop and enhance their community's collaborative efforts to fight financial exploitation.

Key findings

- Networks increase coordination and improve collaboration among responders, service providers and other relevant stakeholders.
- Networks improve the prevention, detection, reporting of and response to elder financial exploitation.
- Although hundreds of communities have developed networks, networks are not yet present in much of the United States - only 25 percent of all counties in the United States currently have a network addressing elder abuse issues.

- Most networks addressing financial exploitation do so as part of a broader focus on elder abuse - only 6 percent of known networks specialize in preventing and responding to financial exploitation.
- Networks primarily follow the Triad and multi-disciplinary team models of collaboration. Triads often bring together seniors and law enforcement to increase community education about safety and crime. Multi-disciplinary teams bring together professionals from different fields to review cases of elder abuse including financial exploitation.
- Networks' most common ways of fighting financial exploitation are through community education, professional training and case review.
- Networks share some common features and needs, including a resourceful coordinator, some start-up funding and technical assistance support, and some long-term funding and staffing.
- Most networks do not require significant funding to start up or continue functioning.
- Existing networks are often the catalyst for new networks; effective networks seek opportunities for replication and ensuring statewide coverage.

Recommendations

- Professionals working with or serving older adults should create networks in communities where they do not currently exist, especially in communities with a large number of older people.
- Members of existing networks should seek to expand resources and capacity as needed.
- Elder abuse networks that do not focus on financial exploitation should develop activities and the capacity to respond to elder financial exploitation by seeking to include as network members professionals with financial expertise, such as forensic accountants. Also, they should implement educational programs for older adults, caregivers, and professionals on how to prevent, detect and respond to financial exploitation.

- Elder financial exploitation networks should seek to include law enforcement as network members and to encourage their meaningful participation in network activities, including but not limited to educational or case review efforts.
- Because financial institutions are uniquely positioned to detect that an elder account holder has been targeted or victimized and to take action, elder financial exploitation networks should seek to include financial institutions, large and small, as network members. Similarly, financial institutions should seek to join and participate in local networks.
- To help ensure the network's long-term sustainability, financial exploitation networks should implement strategies to institutionalize the coordinator role as a permanent staff position.
- Networks in areas with older Americans of diverse linguistic, ethnic and racial backgrounds should seek to engage stakeholders that serve these populations and deliver educational and case review services relevant and appropriate to these populations.
- Networks should seek to expand coverage into rural areas by creating regional networks through which resources can be shared and by using teleconferencing and videoconferencing in lieu of travel when necessary.
- Networks engaging in educational activities, especially those networks with limited resources, should use existing federal, state and local educational resources.

1. Introduction

Elder financial exploitation destroys the financial security of millions of older Americans annually.¹ In response to this crisis, hundreds of communities across the United States have created collaborative networks to protect their older residents.² These networks, which often bring together key community stakeholders and resources, engage in varied activities designed to prevent, detect, and/or respond to elder financial exploitation.³ Though many strong networks exist nationwide, networks do not exist in most communities, including many in which seniors represent a large share of the population, which creates considerable opportunities to expand this approach.⁴

¹ With over 60 million Americans age 60 and over according to Census estimates, and an annual prevalence rate of 5.2 percent, an estimated 3.2 million Americans were victims of financial exploitation in 2014. See Ron Acierno, et al., *Prevalence and Correlates of Emotional, Physical, Sexual and Financial Abuse and Potential Neglect in the United States: The National Elder Mistreatment Study*, 100 *American Journal of Public Health* 292-97 (Feb. 2010), available at <http://doi.org/10.2105/AJPH.2009.163089>; Census Bureau, American Community Survey, Table S0101- 5 Year Estimates Population 60 years and over in the United States 2010-2014, http://factfinder.census.gov/bkmk/table/1.0/en/ACS/14_5YR/S0102 (last visited July 27, 2016).

² Lisa Nerenberg, *Communities Respond to Elder Abuse*, 46 *Journal of Gerontological Social Work* 8 (2006), available at http://dx.doi.org/10.1300/J083v46n03_02.

³ Georgia Anetzberger, *The Evolution of a Multidisciplinary Response to Elder Abuse*, 13 *Marquette Elder's Advisor* 13, 1 (2011), available at <http://scholarship.law.marquette.edu/cgi/viewcontent.cgi?article=1005&context=elders>.

⁴ See the Quantitative analysis section in Appendix A for details about geographic analysis and categorization of existing networks.

To increase our understanding of how elder financial protection networks can grow and endure, the CFPB conducted research nationwide. With the help of the Federal Research Division of the Library of Congress, we attended network meetings and interviewed representatives from 23 elder protection networks and various experts in the field.⁵ Our inquiries focused on networks' objectives, structure, leadership, funding, members, activities and challenges. In addition, we conducted a quantitative analysis to examine networks' presence in communities across the United States.⁶

This report highlights what elder financial exploitation prevention and response networks (also referred to as “networks” and “elder protection networks”) do, how they work, how they can work better, and how they can be established. The report presents CFPB's recommendations to existing networks and key stakeholders to develop and enhance their community's collaborative efforts to fight financial exploitation. Our goal is to help communities enhance and expand protections for older Americans against elder financial exploitation. Accompanying this report is a Resource Guide with promising practices, sample documents, and resource materials.

⁵ CFPB contracted with the Library of Congress through an Inter-Agency Agreement to conduct the qualitative portion of this study. CFPB staff participated in some of the interviews and case studies.

⁶ See Appendix *infra* for a fuller discussion of the methodology used in producing this report.

2. Elder financial abuse is a severe and widespread problem

Financial abuse or exploitation is a widespread form of elder abuse that often occurs in tandem with neglect and other types of elder abuse.⁷ Financial abuse can be perpetrated by family members, caregivers, fiduciaries (such as court-appointed guardians and agents under a power of attorney), financial advisers, home repair contractors, scam artists, and others. Older adults can be attractive targets because they may have accumulated assets or equity in their homes,⁸

⁷ NCPEA, et al., *The MetLife Study of Elder Financial Abuse: Crimes of Occasion, Desperation, and Predation Against America's Elders*, 17-18 (June 2011), available at <http://www.giaging.org/documents/mmi-elder-financial-abuse.pdf> (hereinafter MetLife Study); Shelly L. Jackson and Thomas L. Hafemeister, *Pure Financial Exploitation vs. Hybrid Financial Exploitation Co-Occurring With Physical Abuse and/or Neglect of Elderly Persons*, 2 *Psychology of Violence* 286 (2012), available at <http://dx.doi.org/10.1037/a0027273> (hereinafter Pure Financial Exploitation). For definitions of the forms of elder abuse, see National Center for Elder Abuse (NCEA), *Types of Abuse*, <https://ncea.acl.gov/faq/abusetypes.html> (last visited July 27, 2016).

⁸ The typical U.S. household headed by a person age 65 and older has a net worth 47 times greater than a household headed by someone under 35. Richard Fry, et al., *The Rising Age Gap in Economic Well-Being* (2011), available at <http://www.pewsocialtrends.org/2011/11/07/the-rising-age-gap-in-economic-well-being/>.

and often receive regular income such as Social Security or a pension.⁹ They may be especially vulnerable due to isolation, cognitive decline, physical disability, health problems or the recent loss of a loved one.¹⁰ For many older victims of financial exploitation, their losses are impossible to recover.¹¹ Elder financial exploitation may also result in a loss of independence or material hardship,¹² and may lead to depression or even suicide.¹³

Studies suggest that financial exploitation is the most common form of elder abuse and that only a small fraction of incidents are reported.¹⁴ Because elders often do not report their losses, quantifying the true magnitude of the problem and its monetary impact is challenging, if not impossible. Estimates of losses from elder financial abuse range from \$2.9 billion to as high as

⁹ Census Bureau, Current Population Survey, 2015 Annual Social and Economic Supplement, Table PINC-08, Source of Income in 2014—People 15 Years Old and Over, by Income of Specified Type in 2014, Age, Race, Hispanic Origin, and Sex (2015), http://www.census.gov/hhes/www/cpstables/032015/perinc/pinc08_000.htm (last visited July 27, 2016)

¹⁰ *Pure Financial Exploitation*, *supra* note 7.

¹¹ Lisa Nerenberg, *Communities Respond to Elder Abuse*, 46 *Journal of Gerontological Social Work* 8 (2006), available at http://dx.doi.org/10.1300/J083v46n03_02.

¹² True Link Financial, *The True Link Report on Elder Financial Abuse 2015*, 1, 4 (fn. 3) (January 2015), available at <https://truelink-wordpress-assets.s3.amazonaws.com/wp-content/uploads/True-Link-Report-On-Elder-Financial-Abuse-012815.pdf>. Estimating that 954,000 elders in the United States are currently skipping meals as a result of financial abuse.

¹³ *Id.*; *Pure Financial Exploitation*, *supra* note 7, 286.

¹⁴ Ron Acierno, et al., *Prevalence and Correlates of Emotional, Physical, Sexual and Financial Abuse and Potential Neglect in the United States: The National Elder Mistreatment Study*, 100 *American Journal of Public Health* 292-97 (Feb. 2010), available at <http://doi.org/10.2105/AJPH.2009.163089>; Lifespan of Greater Rochester, Inc., et al., *Under the Radar: New York State Elder Abuse Prevalence Study—Self-Reported Prevalence and Documented Case Surveys—Final Report*, 50 (May 2011), available at <http://www.nyselderabuse.org/documents/ElderAbusePrevalenceStudy2011.pdf>. This study estimated that only 1 in 44 cases of financial abuse came to the attention of agencies that provide services to victims of elder abuse in New York State.

\$36.5 billion each year.¹⁵ Financial exploitation of older adults also has costs for society, resulting in economic losses for financial institutions, government agencies and programs (such as Medicare and Medicaid), and taxpayers.¹⁶

These individual and societal costs of financial crimes against older adults are likely to become an even bigger problem as the U.S. population ages. By 2050, the population age 65 and over is projected to be 83.7 million, almost double the estimated 43.1 million in 2012.¹⁷

¹⁵ MetLife Study, *supra* note 7, at 2; True Link Financial, *The True Link Report on Elder Financial Abuse 2015*, (January 2015), available at <https://truelink-wordpress-assets.s3.amazonaws.com/wp-content/uploads/True-Link-Report-On-Elder-Financial-Abuse-012815.pdf>. Estimates vary significantly largely due to definitional and methodological differences. For a discussion of the MetLife and True Link methodologies, see Tobie Stanger, *Financial Elder Abuse Costs \$3 Billion a Year. Or is it \$36 billion?* Consumer Reports, Sept. 29, 2015.

¹⁶ Yufan Huang and Alan Lawitz, *The New York State Cost of Financial Exploitation Study* (May 2016), available at <http://ocfs.ny.gov/main/reports/Cost%20of%20Financial%20Exploitation%20Study%20FINAL%20May%202016.pdf>; Jilene Gunther, *The Utah Cost of Financial Exploitation*, (August 2011) available at <http://victimsofcrime.org/docs/default-source/financial-fraud/2011-economic-cost-of-financial-exploitation.pdf?sfvrsn=2>.

¹⁷ U.S. Census Bureau, *An Aging Nation: The Older Population in the United States—Population Estimates and Projections—Current Population Reports*, (May 2014), available at <https://www.census.gov/prod/2014pubs/p25-1140.pdf>.

3. Networks help fight financial exploitation

No single community entity is responsible for effectively preventing and responding to elder financial exploitation, nor can one entity do so. Resources to combat this problem are also increasingly limited as the problem itself and the older population grow and funding levels remain relatively static. In order to address these challenges, many communities have created networks to help prevent, detect, and/or respond to elder financial exploitation.

An elder financial protection network is a sustained and largely voluntary collaboration or partnership that works to prevent, detect, and/or respond to elder financial exploitation.

Generally, a network discussed in this report is a sustained and largely voluntary collaboration, coalition, alliance, or partnership of private and public entities, organizations and individuals that works with or on behalf of older people.¹⁸

¹⁸ Some of the networks examined in this project were created as a result of a state mandate to establish a team or protocol for multidisciplinary collaboration. For instance, California law requires Adult Protective Services agencies to lead multi-disciplinary team networks (MDT's) in every California county. See Cal. Welf. & Inst. Code § 15763(a). Types of networks are discussed in Section 4.

Over the last two decades a growing body of research has shown that networks are effective community responses to elder financial exploitation. Notably, a 2013 study found that cases that were examined by a forensic center, a type of network that brings together experts from different agencies, had higher prosecution, conviction and restitution rates than cases that were not examined by a forensic center.¹⁹ Earlier studies had also shown that the creation of community networks resulted in an increased number of trainings, referrals and specialized assessments, and improved coordination among networks' key stakeholders.²⁰

Experts and professionals in the field agree that increased multidisciplinary community collaboration and interagency cooperation is vital to addressing the problem of elder abuse, especially financial exploitation.²¹ The 2014 *Elder Justice Roadmap*, which brought together

¹⁹ Adria Navarro, et al., *Holding Abusers Accountable: An Elder Abuse Forensic Center Increases Criminal Prosecution of Financial Exploitation*, 53 *The Gerontologist* 303-312 (2013), <http://gerontologist.oxfordjournals.org/content/early/2012/05/15/geront.gns075>. (hereinafter *Holding Abusers Accountable*)

²⁰ Aileen Wiglesworth, et al., *Findings from an Elder Abuse Forensic Center*, 46 *The Gerontologist* 277-283 (2006), available at <http://www.ncbi.nlm.nih.gov/pubmed/16581893>; Mary S. Twomey, et al., *The Successes and Challenges of Seven Multidisciplinary Teams*, 22 *Journal of Elder Abuse & Neglect* 291-305 (2010), available at <http://www.ncbi.nlm.nih.gov/pubmed/20711916>.

²¹ Page Ulrey and Bonnie Brandl, *Collaboration is Essential: King County's Response to a Case of Elder Abuse and Exploitation*, 36 *Journal of the American Society on Aging* 77 (2012), available at <http://www.asaging.org/blog/collaboration-essential-king-countys-response-case-elder-abuse-and-exploitation>; Georgia J. Anetzberger, *The Evolution of a Multidisciplinary Response to Elder Abuse*, 13 *Marquette Elder's Adviser* 107-128 (2011), available at <http://scholarship.law.marquette.edu/cgi/viewcontent.cgi?article=1005&context=elders>; Bonnie Brandl, et al., *Enhancing Victim Safety Through Collaboration*, 7 *Care Management Journals* 64-72 (2006), available at <http://www.ncbi.nlm.nih.gov/pubmed/17214238>.

experts, leading public officials, and stakeholders to discuss effective ways to address elder abuse, supports the creation of networks.²²

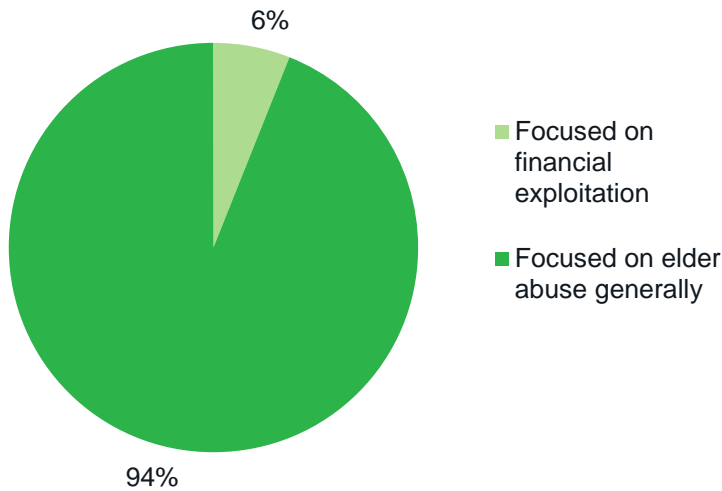
Elder financial protection networks already exist in many areas throughout the country. Most networks focus on protecting seniors from financial exploitation as part of a broader mission to fight elder abuse, though some do have a singular focus on financial exploitation.²³ The CFPB identified 891 networks nationwide working on financial exploitation issues. According to our analysis, 837 (94 percent) appear to have a broader focus on protecting seniors from all types of abuse, and 54 (or 6 percent) appear to be exclusively focused on financial exploitation.²⁴

²² Marie-Therese Connolly, et al., *The Elder Justice Roadmap: A Stakeholder Initiative to Respond to an Emerging Health, Justice, Financial and Social Crisis* (July 2014), available at https://www.justice.gov/elderjustice/research/resources/EJRP_Roadmap.pdf.

²³ The limited data available on networks that focus generally on elder abuse show that all of these networks are involved in tackling the problem of financial exploitation, yet their degree of engagement and resources devoted to fighting financial exploitation varies significantly.

²⁴ There is no existing comprehensive dataset on the activities and scope of these networks. Existing data do provide a basis for distinguishing between networks that work on elder financial exploitation as part of their broader focus on elder abuse and safety and networks that focus exclusively on elder financial exploitation. Many networks may also focus on abuse of all vulnerable adults (such as younger adults with disabilities).

FIGURE 1: NETWORKS BY FOCUS



We found that networks –whether focused exclusively on financial exploitation or more broadly on elder abuse– benefit older adults and the networks’ members. When asked about the benefits of their network to seniors and their organizations, representatives of the networks in our study spoke of their networks’ ability to (1) improve response to cases of financial exploitation, (2) increase reporting of cases, (3) enhance members’ skills and capacity to address financial exploitation, and (4) improve coordination, including the use of community resources.

Networks improve response to financial exploitation

Several networks in our study meet regularly to review and discuss cases of financial exploitation. These networks bring together professionals with different backgrounds and expertise to help law enforcement, adult protective services (APS) and local prosecutors gain a better understanding of the cases, provide support to victims, and prosecute perpetrators. The local networks in Cook County, IL and Oklahoma City, OK, for instance, stated that the participation of financial experts, such as forensic accountants and compliance officers from financial institutions, was crucial in case review. The financial experts contribute advice and analysis regarding, among other things, financial transactions, access to needed documentation, and recovery of assets.

Networks often create new or improve existing channels of communication between first responders, such as APS, law enforcement, and financial service providers. In addition, networks help members gain a clear understanding of each other’s roles, policies, resources and limitations. A member from a law enforcement agency in Cook County, IL said, “People get to know each other, you’ve met them, talked to them, know where to go for your victim.” A local network in Fairfield County, OH stated that network collaboration helped speed up processes such as obtaining guardianship orders and emergency orders for placement and to freeze assets. Similarly, members of networks in states that include financial institution representatives said that law enforcement, APS, and prosecutors were able to act quickly to protect victims from further losses as a result of relationships they developed with network members from banks and credit unions.

Networks increase reporting of suspected cases

Most of the networks interviewed recounted that network participation improves reporting of cases. Members of networks across the board agreed that a major challenge in addressing financial exploitation is that many cases are unreported. Many networks located in states with mandatory reporting laws, including Colorado, Hawaii, and California,²⁵ work to raise awareness of their states’ reporting requirements for financial institutions. In other states, networks have led the efforts to establish hotlines and referral protocols.

Networks report that their efforts have resulted in greater numbers of cases coming to the attention of authorities.

²⁵ See Cal. Welf. & Inst. Code § 15630.1; Colo. Rev. Stat. § 18-6.5-108(1); Haw. Rev. Stat. § 412:3-114.5.

These networks report that their efforts have resulted in greater numbers of cases coming to the attention of authorities. In Ohio, a local network generated an additional 950 referrals to APS in 2014.

In addition, some of the networks that we interviewed stated that they encourage reporting of financial exploitation through community education. Local networks in Pickaway County, OH and Jefferson County, CO mentioned that their direct engagement of seniors has helped to improve reporting by strengthening trust between seniors and law enforcement. They said that their efforts help to embolden seniors in their communities to come forward and report cases, identify other seniors who may be victims of financial exploitation, and help the network's education efforts by spreading the word.

Network participation enhances members' skills and ability to address financial exploitation

Improving reporting and response to cases of financial exploitation is also beneficial to the individual professionals who participate in the networks. These professionals mentioned that each case that they discussed and responded to as part of their collaborative work enhanced their professional expertise. These experiences provide them with problem-solving skills and knowledge about a variety of topics including how financial products and services work and how financial exploitation interacts with other forms of elder abuse. A local network in Hawaii developed a process to institutionalize their experiences from their case review work through a 'lessons learned' survey form. The case review team collects these reports to improve prosecution referrals, care provided to victims, and support for witnesses.

Networks leverage and save community resources

Networks allow organizations to align the work and leverage resources of the member organizations. Networks leverage their members' resources in a number of ways. At the most functional level, members share resources such as volunteers, spaces for meeting and public

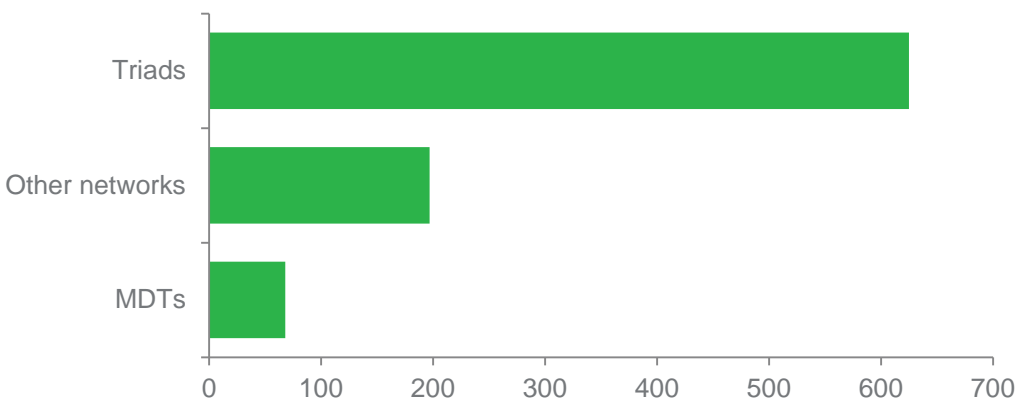
events, teleconference lines and other means for remote participation. Similarly, network members share training and cross-promotion opportunities. In Pickaway County, OH, for example, the local network was able to use their private sector members' access to media, billboards, and other vehicles to conduct their educational campaigns. In other networks, staff expertise was shared. The networks in Orange County, CA, Houston, TX, and Cook County, IL, among others, help APS staff, prosecutors and law enforcement by offering free professional services from geriatricians, forensic accountants, compliance officers, and elder law attorneys.

Furthermore, in communities where more than one network exists, networks communicate with each other and find ways to avoid duplication of efforts. For instance, in Los Angeles, CA, two networks were actively reviewing cases of financial exploitation. As a result, one network shifted from conducting multidisciplinary case review to providing multidisciplinary training for those who provide service in the area of elder financial exploitation.

4. There are many different types of effective networks

We found that networks often have different structures, perform different activities, and are known by a variety of names. Yet two models of collaboration seem to dominate: Triads and multi-disciplinary teams. Approximately 78 percent of all networks identified follow these models of collaboration. In addition, we found that their most common activities include community education, professional training, and case review.

FIGURE 2: NETWORKS BY MODEL



Multi-Disciplinary Teams

Multi-Disciplinary Teams provide agencies, such as APS and law enforcement, with resources, consultation, and advice regarding elder abuse cases. MDTs bring together social service, legal, medical, psychological, and law enforcement experts. While most MDTs are focused on case review activities, some MDTs provide education or training to members and the

public. MDTs account for 8 percent of all existing networks working on elder abuse, but comprise 87 percent of the networks that are focused exclusively on financial exploitation.²⁶

There are several types of specialized MDTs, including one specifically focused on financial exploitation. These specialized MDTs include Financial Abuse Specialist Teams (FASTs), Forensic Centers (FCs), and Elder Fatality Review Teams (EFRTs), also called Elder Death Review Teams (EDRTs).

- **Financial Abuse Specialist Teams** typically provide consultation and support to agencies, such as APS case workers, law enforcement, and long-term care ombudsmen,²⁷ who are responding to and investigating cases of elder financial exploitation.²⁸ Members often are comprised of public agencies but may include private sector experts from the fields of banking, insurance, accounting, law, medicine, and real estate.²⁹
- **Elder Abuse Forensic Centers** bring together professionals in criminal justice, healthcare, and social services to review cases of abuse, assess and evaluate victims' cognitive capacity, improve the prospects of prosecution, develop appropriate service

²⁶ NCEA, *Multidisciplinary Teams*, <https://ncea.acl.gov/whatwedo/practice/teams-index.html> (last visited July 27, 2016).

²⁷ Long-term care ombudsmen are advocates for residents of nursing facilities, board and care homes, assisted-living facilities and similar adult care facilities, in programs administered by the Administration on Aging/Administration for Community Living. Ombudsman staff and volunteers work to resolve problems and concerns of individual residents. Every state has an Office of the State Long-Term Care Ombudsman headed by a full-time state ombudsman. For more information about financial exploitation in long-term care settings, see CFPB, *Protecting residents from financial exploitation, A manual for assisted living and nursing facilities* (May 2014), available at http://files.consumerfinance.gov/f/201406_cfpb_guide_protecting-residents-from-financial-exploitation.pdf.

²⁸ NCEA, *Financial Abuse Specialist Teams (FAST)*, <https://ncea.acl.gov/whatwedo/practice/teams-index.html> (last visited July 27, 2016).

²⁹ Joan Virginia Allen, *Financial Abuse of Elders and Dependent Adults: The FAST (Financial Abuse Specialist Team) Approach*, 12 *Journal of Elder Abuse & Neglect* 85-91 (2000), available at http://dx.doi.org/10.1300/J084v12n02_09.

responses, and support prevention of elder abuse through awareness campaigns and professional education.³⁰ Team members also may conduct medical and other assessments, provide consultations during and between meetings, accept referrals for services, and testify as expert witnesses in legal proceedings. FCs can be a very effective form of elder abuse prevention network, yet they are relatively uncommon.³¹ They are also a resource-intensive form of network, and they may be difficult to create without ongoing funding and investment of professional expertise.

Triads

Triads provide coordination between law enforcement, elder service professionals, and older community members in order to promote crime awareness and prevention.³² Their primary activities include education and training of law enforcement, seniors, caregivers, and professionals involved in serving seniors.³³ They may also perform other activities involving crime reduction and safety.

Triads are the most common form of community collaboration focused on elder abuse and safety. With over 600 Triads nationwide, Triads account for 70 percent of all networks. We are unaware of any Triads exclusively focused on elder financial exploitation. However, some Triads have made financial exploitation and fraud prevention a core focus of their educational efforts.

³⁰ NCEA, *Forensic Centers*, <https://ncea.acl.gov/whatwedo/practice/Teams-forensic.html> (last visited July 27, 2016).

³¹ *Holding Abusers Accountable*, *supra*, note 19. A study of the Los Angeles County Elder Abuse Forensic Center found that FC case review significantly increased the rate of prosecution.

³² The Triad program focused on elder adults began at the national level in 1988. The National Association of Triads, Inc. (NATI), formed by the National Sheriffs Association, provides coordination and support for the development of Triads throughout the country. Triads are often run by a SALT (Seniors and Law Enforcement Together) council.

³³ NATI, *Triad Program Manual* (2011), available at <https://www.sheriffs.org/sites/default/files/uploads/TRIAD/NATI%20Manual-2012.pdf> .

Their engagement of law enforcement and seniors and their presence in over 600 communities in nearly 40 states are key strengths of the Triad model.

Other types of networks

There are many other types of networks organized to fight elder abuse and elder financial abuse. Twenty-two percent of the networks working on elder abuse are not MDTs or Triads. These other networks, coalitions, and task forces engage in a variety of activities ranging from education to advocacy. Some of these networks also work on case consultation and review similar to financial abuse specialist teams (FASTs). Some of them may also focus on abuse of vulnerable adults of all ages (such as younger adults with disabilities).

Networks provide varied valuable services

Networks in our study facilitated collaboration on a variety of activities related to elder financial exploitation ranging from education to advocacy. Some networks performed a combination of these activities, while others specialized in only one. Nearly all networks studied were involved in education efforts. Over half of them conducted case consultation and review.

Networks educate seniors and professionals

Consumer and professional education was the most common activity undertaken by the networks in our study. Many regarded education as critical to preventing elder financial exploitation. Training by these networks aimed to raise awareness about the problem and strategies for reducing it. In order to combat financial exploitation, such awareness on the part of older people and those who serve them is essential.

In reviewing network training activities, we found that all of the networks recognized the need for the education and training to be ongoing because of the ever-changing nature of certain forms of financial exploitation, staff turnover, changing laws, and the growing number of older people in their communities.

Some of the networks we studied focused on educating their members, while others concentrated on educating seniors, caregivers, first responders (such as law enforcement personnel and APS workers), financial service providers, and the general public. Some networks

used nationally recognized training materials, which can be accessed easily for free.³⁴ Below, we provide a few examples of the activities of networks that are engaged in educating different target groups on elder abuse.

Triads educate older adults about all types of elder abuse. They often invite speakers—usually experts, but sometimes victims or their relatives—and show video presentations depicting stories about victims and perpetrators. In addition, some FASTs such as the Houston Financial Abuse

Ongoing training can profoundly improve a community’s ability to fight this crime.

Specialist Team (H-FAST) and the Los Angeles County Fiduciary Abuse Specialist Team (LAC FAST) provide training for their members, chiefly on elder financial exploitation.

Some networks use the CFPB’s and Federal Deposit Insurance Corporation’s jointly created Money Smart for Older Adults (MSOA) curriculum as an educational resource. Members of the Illinois Financial Abuse Specialist Team (iFAST), for example, use MSOA to educate seniors. The network plans to recruit non-member volunteers to provide trainings at senior venues and financial institutions. In 2014 and 2015, North Carolina’s State Department of Health and Human Services collaborated with the State Employees Credit Union (SECU) to implement a train-the-trainer MSOA initiative across the state. During May and June 2014 and 2015, SECU provided training in seven regions throughout the state for nearly 400 local professionals, including representatives from the 100 county social services departments, local Area Agency on Aging (AAA) staff, and the North Carolina Retired Government Employee Association.

³⁴ For free educational resources, see Section 6 of the Resource Guide at consumerfinance.gov/elder-protection-networks.

Two networks we looked at are using the National Clearinghouse on Abuse in Later Life's (NCALL's) nationally certified "train-the-trainer" course for law enforcement. In 2013, the St. Tammany SALT Council, LA worked with NCALL trainers to train seven teams of instructors to present the one-day program to law enforcement officers statewide. The instructor teams included a law enforcement officer, a prosecutor, an advocate, a protective services investigator, and a facilitator. The involvement of these different types of professionals, who work for different organizations and agencies, illustrates the collaborative potential that these local networks create. The Council continues to offer the training free to law enforcement agencies in the state that request it.

Networks also offer training and education to financial institutions and their staff. For instance, the Elder Financial Protection Network (EFPN) in northern California created a training program for financial institutions.³⁵ Over the course of 12 years, EFPN worked with more than 400 financial institutions to train their staff using this training program. EFPN also organized conferences and meetings with members of the banking industry, law enforcement and social services to enhance collaboration at the local, regional and state level.

Network collaboration helps professionals review difficult cases

Review of suspected cases of financial exploitation is the second most common activity that the networks examined in our study perform. Case review activities include: assisting law enforcement and APS case workers in the investigation of reported cases; preserving or recovering victims' assets; facilitating the prosecution of perpetrators; educating network members on elder abuse; and identifying gaps in services.

³⁵ A Senior Program Analyst in CFPB's Office for Older Americans and member of the study team served as EFPN's CEO from 2001 to 2011.

The networks that we studied with active case review programs report success in performing these activities, except recovering victims' assets, which is often not possible.

The Oklahoma County Coalition Against Financial Exploitation of the Elderly (OK-CAFEE), which describes itself as a FAST, carries on a vigorous case review program. The Oklahoma County District Attorney's Office reviews for possible prosecution every APS case in the county—substantiated and unsubstantiated. The OK-CAFEE devotes part of every monthly meeting to work on those cases selected for prosecution. Select members of the network (the Deputy Assistant District Attorney, the APS Program Field Representative, law enforcement personnel, and representatives from the Division of Aging Services) participate, as well as guests deemed relevant to the case. Limiting the network's personnel protects the victim's privacy, which is an important consideration in case review. At the time of our interview, the Oklahoma County District Attorney's Office had prosecuted 225 APS cases since 2005, all but four of which were elder financial exploitation cases. In the same time period, in a neighboring county with only 17 percent fewer residents, there were only three cases of elder financial exploitation prosecuted.³⁶ The members of the OK-CAFEE attributed the vastly different prosecution rates to the case review activities of their network.

In looking at case review functions, we found that case review provided benefits beyond the improved resolution of individual cases. Team members became better acquainted with the roles and knowledge of the other professionals involved. They also developed a sense of unified purpose that helped them to carry out their duties on a day-to-day basis. Members learned

The members of the OK-CAFEE attributed the vastly different prosecution rates to the case review activities of their network.

³⁶ In 2012, the population age 65 and older in Oklahoma County was 90,381, whereas the population 65 and older in Tulsa County was 76,934. Census Bureau, American Community Survey, Table S0103- 1-Year Estimates Population 65 years and over in the United States 2012, http://factfinder.census.gov/bkmk/table/1.0/en/ACS/12_1YR/S0103 (last visited July 27, 2016).

common abusive scenarios, and whom to call for help. This cooperation enhances the individual members' ability to prevent, detect and respond to financial exploitation.

Some networks involved in case review help to advance policy changes to aid victims and prevent abuse. For example, the OK-CAFEE made recommendations that led to legislative changes to enhance protections against elder abuse and increase penalties for the perpetrators of such abuse.³⁷

Networks face a number of challenges when conducting case review. For example, cases involving interstate or offshore scams and perpetrators were more difficult to review than cases where the perpetrator resided locally and law enforcement had the ability to intervene immediately.

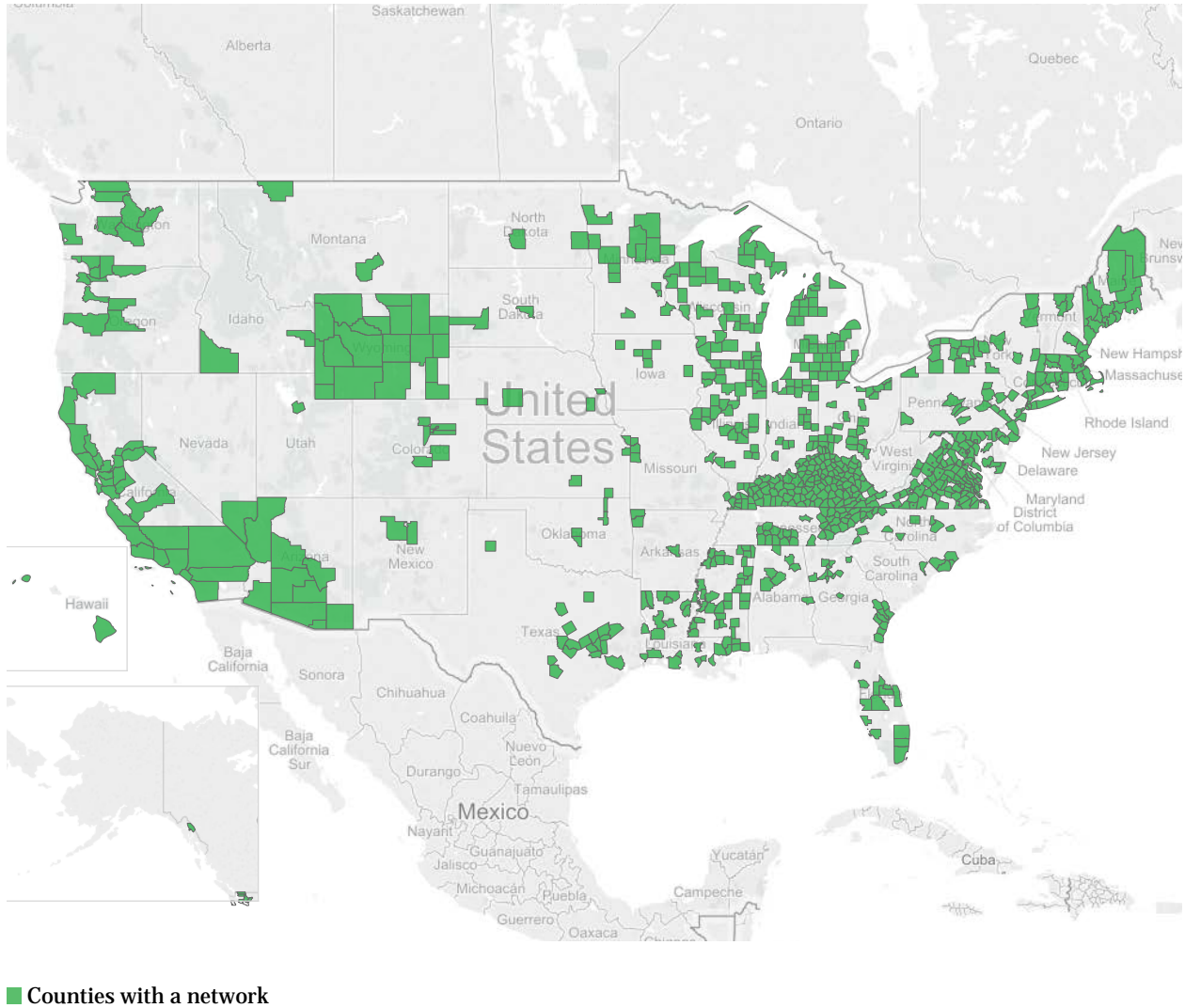
³⁷ See 21 Okla. Stat. § 21-843.4; see also OK-CAFEE, *A Successful Strategy to Identify and Combat Financial Exploitation*, <http://ltombudsman.org/uploads/files/issues/EstherHousePPT.pdf> (last visited July 27, 2016).

5. Networks protect seniors in hundreds of communities

The benefits of networks and the variety of possible models are shown by the hundreds of communities where they exist. Nonetheless, large areas of the country do not currently have a network and are ripe areas for expansion of this beneficial approach. We identified many localities and regions throughout the country without networks.³⁸ Only 25 percent of the 3,143 counties in the U.S. have a known network working on elder abuse issues and only 2 percent of all counties appear to have a network focused exclusively on financial exploitation. As the older population continues to grow throughout the country, there is ample opportunity to create many more new networks to respond to the growing problem of elder financial exploitation.

³⁸ See Appendix A for methodology and details about the scope and limitations of this geographic analysis.

FIGURE 3: MAP OF NETWORKS BY COUNTY



Most networks operate in densely populated counties

Networks, including those exclusively focused on financial exploitation, tend to operate in densely populated counties. These counties have the largest number of residents age 65 and over and elders of diverse ethnic and racial backgrounds. Our analysis shows that the 20 counties with the largest number of people age 65 and over have at least one network, and half of them have two or more. Over half of these counties also have a network focused exclusively on financial exploitation.

TABLE 1: PRESENCE OF NETWORKS IN THE 20 COUNTIES WITH THE LARGEST NUMBER OF PEOPLE OVER 65

County*	Total Population over 65	Number of networks
Los Angeles County, California	1,149,893	4
Cook County, Illinois**	649,182	11
Maricopa County, Arizona	513,536	2
Orange County, California	382,179	4
San Diego County, California	382,162	5
Miami-Dade County, Florida	379,862	1
Harris County, Texas	371,250	6
Kings County, New York	302,335	2
Queens County, New York	300,885	2
Palm Beach County, Florida	300,710	1
Riverside County, California	282,688	1
Broward County, Florida	267,480	1
Clark County, Nevada	247,087	1
Wayne County, Michigan	236,218	1
King County, Washington	232,417	1
Dallas County, Texas	225,872	3
New York, New York	225,277	3
Suffolk County, New York	215,852	1

County*	Total Population over 65	Number of networks
Santa Clara County, California	214,715	2
Nassau County, New York	213,518	1

* **Bolded** county names indicate that the county has at least one network exclusively focused on financial exploitation.

** Cook County has multiple networks that serve specific townships and villages within the county.

Few networks operate in counties with the highest percentage of seniors

While counties with the largest number of older people have at least one network, counties with the largest share of their population over the age of 65 do not appear to have networks in operation. Networks exist in only five of the 20 counties with the largest percent of their population 65 and older. None of these counties has a known network specifically focused on financial exploitation. Counties with a large percent of older people tend to be rural. In these counties, distances and limited resources are often barriers to the development of networks.

TABLE 2: PRESENCE OF NETWORKS IN THE 20 COUNTIES WITH THE LARGEST PERCENT OF POPULATION OVER 65

County	Percent of Population over 65	Number of networks*
Sumter County, Florida	48.7	-
Mineral County, Colorado	38.9	-
Charlotte County, Florida	36.0	-
Hooker County, Nebraska	34.9	-
La Paz County, Arizona	34.4	-
Real County, Texas	33.8	-
Sierra County, New Mexico	33.6	-
Citrus County, Florida	33.6	2
Highland County, Virginia	33.2	1
Alcona County, Michigan	33.2	-

County	Percent of Population over 65	Number of networks*
Llano County, Texas	33.0	-
Highlands County, Florida	33.0	-
Lancaster County, Virginia	32.9	1
McIntosh County, North Dakota	32.9	-
Sarasota County, Florida	32.5	2
Hinsdale County, Colorado	32.5	-
Northumberland County, Virginia	32.2	1
Jeff Davis County, Texas	31.9	-
Foard County, Texas	30.9	-
Hickory County, Missouri	30.9	-

* [-] Indicates that we did not identify a network in this county

Only a quarter of states have a network in most of their counties

In about 12 states, networks operate in most of their counties. In Wyoming and California, for example, multidisciplinary teams led by APS are responsible for providing statewide coverage. In Virginia and Kentucky, statewide coverage is provided through a number of regional or multi-county networks that operate in two or more counties and allow small counties to share resources. These states offer promising models to expand coverage into rural and less densely populated areas.

6. Many networks share key characteristics

Many successful networks share common attributes. Many of these networks have an engaged coordinator. They also have representatives from law enforcement agencies and financial institutions. They seek technical expertise and advice and funding and other resources to ensure their long-term presence in their communities.

Many networks have a resourceful coordinator

Networks need a coordinator to oversee administration and activities.³⁹ The network coordinators we spoke to had many responsibilities that varied depending on the nature of the network. Typically, the coordinators: (1) identify and recruit members; (2) facilitate the development of the mission and goals; (3) secure resources such as meeting space; (4) schedule

³⁹ Similar findings regarding the role of coordinators can be found in Risa Breckman, et al., *Elder Abuse Multidisciplinary Teams: Planning for the Future*, (April 2015), available at http://nyceac.com/wp-content/uploads/2015/04/Elder_Abuse_MDTs_Planning_for_the_Future_Final.pdf.

and organize meetings and events; (5) identify training needs, topics and speakers; and (6) secure grants or other funding to ensure the network's continuation.

Most network members described the coordinators as well-connected, multi-skilled, passionate, inclusive, and able to create an environment where all members felt comfortable raising issues. Members understood that the coordinators' roles were critical for the success of their networks.

The coordinators' abilities to develop and maintain their networks depended, according to many, largely on access to sufficient resources, which often included adequate funding. Some networks benefited from multi-year grants that allowed them to create full or part-time positions for their coordinators.⁴⁰ Other coordinators had full-time paid positions related to elder services or law enforcement, but network coordination was only one of their responsibilities.⁴¹ There were also coordinators who volunteered their time.⁴²

Many networks engage key stakeholders

Network members were diverse in number and affiliation. Membership typically aligned with the primary activities of the networks. For example, networks that conducted case reviews had representatives from APS among their members. But regardless of the primary network activities undertaken, common network partners for combatting elder financial abuse are law

⁴⁰ For example, the coordinators of the Elder Abuse Law Enforcement Collaboration (EALEC) in Hawaii and the District's Collaborative Training & Response for Older Victims (DC TROV) had full-time positions funded by grants. The Colorado Coalition for Elder Rights and Abuse Prevention used grants to pay its coordinator to work for 27 hours per month.

⁴¹ In Jefferson County, CO, the District Attorney's Office provided funding for one of the two Triad coordinators to run the organization, among many other activities. The Los Angeles County, CA Financial Abuse Specialist Team coordinator received grants for part-time staff. In Denver, the District Attorney's Office provided funding for a part-time coordinator of CASE. The police department partially funded the Oklahoma City Triad coordinator position.

⁴² For example, the coordinators of the St. Tammany SALT Council and Broward County Triad volunteered their time.

enforcement, legal professionals including prosecutors and legal aid organizations, financial institutions, Area Agencies on Aging or other local senior service organizations, long-term care ombudsmen, healthcare providers, and housing counselors.

Almost all of the networks interviewed considered law enforcement agencies to be key network members because of their critical roles in responding to elder abuse. Some networks have robust participation by law enforcement. The Triads in Broward County, FL, Jefferson County, CO, Oklahoma City, OK, and Oklahoma County, OK, for example, have representatives from the sheriff's offices and police departments attending meetings and giving crime updates. The Northeast Kingdom Vulnerable Adult Action Coalition in Vermont had four local law enforcement agencies involved: the state police, the city police, and two county sheriff's offices. In Illinois, the iFAST received support from the Director of Senior Citizens Services in the Cook County Sheriff's Office. And numerous law enforcement agencies in the Gulf Coast region participate in activities of the SALT in St. Tammany, LA.

Some networks considered financial institutions to be key members because of their expertise and opportunity often to see evidence of the exploitation as it occurs.

Even those networks that reported consistent participation from some law enforcement agencies often had difficulties engaging other law enforcement in the area. Law enforcement officers sometimes were unable to attend meetings because of a lack of time, pressing workloads, competing priorities, low staffing levels (especially in rural areas), and lack of buy-in by command or leadership that did not consider elder financial exploitation to be a priority or perceived it as a civil matter - especially in cases involving exploitation by family member or an agent under a power of attorney.

In addition to law enforcement, some networks considered financial institutions to be key members because of their expertise and frequent opportunity to witness exploitation as it occurs

or identify evidence through fraud detection mechanisms or other loss prevention measures.⁴³ Some networks reported that local financial institutions were often interested in becoming involved. The OK-CAFEE had active representation from financial institutions. According to members, the Operational Security Officer for Oklahoma's largest state-chartered bank attended meetings, as did the Oklahoma Bankers Association's Vice President of Fraud Training. The association is unique as it has a Fraud Training division, which trains bankers and customers throughout the state. Representatives from the OK-CAFEE also expressed a desire to recruit more financial institutions to join the network and increase financial institution reporting.

The iFAST is another network that has developed relationships with financial institutions. It currently has several bank and credit union members. The iFAST invites financial institutions to join as volunteers in case reviews, and holds annual financial summits for training and to build its relationships with financial institutions. Bank and credit union attendance at these summits increased from 1 in 2013 to 34 in 2014.⁴⁴

Networks often benefit from members who bring specialized expertise to financial exploitation situations. For example, the Oregon Attorney General's Task Force on Elder Abuse works with AARP and the Oregon Bankers Association to engage retired financial professionals—bankers, accountants and people with financial forensic backgrounds—with their elder abuse MDTs. These volunteers help APS, law enforcement and prosecutors develop cases that these critical stakeholders would not have had the financial expertise to investigate and, ultimately, file otherwise.

⁴³ CFPB, *Recommendations and report for financial institutions on preventing and responding to elder financial exploitation* (Mar. 2016), available at <http://www.consumerfinance.gov/about-us/newsroom/cfpb-issues-advisory-and-report-for-financial-institutions-on-preventing-elder-financial-abuse/>.

⁴⁴ Illinois has a mandatory training law for financial institutions, which may be partially driving their involvement. Illinois Department of Financial & Professional Regulation, *Consumer Protection Training Completed at Illinois Banks and Credit Unions*, <http://www.idfpr.com/News/newsrsls/030812ConsumerProtectionTraining.asp> (last visited July 27, 2016).

Many networks seek technical assistance and funding during their formation

While there were important variations in network origins—related in part to different objectives and operating environments—new networks benefited from passionate and enthusiastic individuals who became aware of gaps in response to elder abuse through their own experiences or exposure to new training and ideas.

In addition to passion and enthusiasm, and the time required to act on it, seed money and expert mentoring can help launch a network. From 2007 to 2011, several networks, including five in our study, were created as a result of a 4-year project that was funded by the U.S. Department of Health and Human Services Administration on Aging.⁴⁵ The project, conducted by the National Committee for the Prevention of Elder Abuse (NCPEA) and the National Center on Elder Abuse (NCEA), solicited grant proposals from Area Agencies on Aging (AAAs), Title VI grantees (Native American aging services agencies), and community organizations interested in developing new coalitions. At its core, this initiative combined seed funding with technical assistance. Successful applicants were awarded \$10,000 in seed funding for one year.⁴⁶ Trainers provided one-day on-site trainings to the grantees, which covered many of the key issues

⁴⁵ The five networks that were formed with funds from the National Committee for the Prevention of Elder Abuse (NCPEA) in these years were: 1) New York City Elder Abuse Network; 2) Southern Crescent Coalition against Abuse and Neglect; 3) Collaboration Against Abuse, Neglect and Exploitation; 4) Northeast Kingdom Vulnerable Adult Action Coalition; and 5) St. Tammany Elder Abuse Support Team (formed with a grant to St. Tammany SALT Council). Also, Oregon’s Retiree Response Technical Team received \$1,500 from the Archstone Foundation through the NCPEA during this time.

⁴⁶ Mary Lynn Kasunic, et al., *Creating Effective Local Elder Abuse Prevention Networks: A Planning Guide*, (2006), available at <https://victimsofcrime.org/docs/Toolkit%20Bulletins/ncea-steps.pdf?sfvrsn=0>.

confronting new networks. Each network also participated in four technical assistance mentoring teleconferences.⁴⁷

Other networks in our study successfully secured multi-year start-up funding from other sources including the U.S. Department of Justice's Office for Victims of Crime, Office on Violence Against Women, and Justice Assistance Grant program,⁴⁸ and private funding. The DC TROV, for example, won a multi-year federal grant from the Office on Violence Against Women that covered part of the network coordinator's salary, network's cross-trainings, and training of law enforcement personnel.⁴⁹ Finally, at least two networks secured start-up funds from the private sector, one of which was the iFAST.⁵⁰ The formation of the iFAST was inspired by the APS Program Administrator in the Illinois Department of Aging's Office of Elder Rights, who worked with the non-profit AgeOptions to launch the iFAST in 2013. The iFAST received a \$45,000 start-up grant from a bank.

⁴⁷ *Id.* at 2.

⁴⁸ Denver's Communities Against Senior Exploitation (CASE) Partnership won several multi-year federal grants. Hawaii County's Elder Abuse Team won a Justice Assistance Grant to support two collaborations, one being the Elder Abuse Law Enforcement Collaboration (EALEC).

⁴⁹ The DC TROV coordinator previously managed Maryland's Protect Elders Against Crime and Exploitation network, which was created through the NCPEA project. She learned about the Office on Violence Against Women grant while working at Elder Law of Michigan, a non-profit charitable organization.

⁵⁰ The other network, the California Community Partnership for the Prevention of Financial Abuse, which later became the Elder Financial Protection Network, raised over \$3 million over a 10 year period from financial institutions, financial trade associations, training revenues and corporate and foundation grants to fund staffing for professional training and public awareness campaigns.

Many networks obtain ongoing funding from different sources

Many network members interviewed stated that continued funding is necessary for long-term sustainability. As explained above, leveraging existing resources for use by the network reduces the amount needed, but the modest funding that most networks used was considered important for getting their work done. On the other hand, some networks did not find that external funding was necessary at all, because the network activities were already part of their members' jobs.

Some of the networks used sponsors to raise funds. For instance, the Jefferson County Triad Board relied on sponsorships from businesses and nonprofits for its funding.⁵¹ Each sponsor provided \$150 per year. In exchange, the sponsors introduced their organizations at the start of the Triad's general meeting and had their names listed on monthly meeting announcements.

The modest funding that most networks used was considered important for getting their work done.

The coordinators of Ohio's Collaboration Against Abuse, Neglect and Exploitation (CAANE) and Georgia's Southern Crescent Coalition Against Abuse and Neglect (SCCAAN) networks, which were both recipients of NCPEA start-up funds, did not consider these funds to be essential for their formation. Both of these networks also expressed no need for further grant funding to sustain their network activities. To date, the CAANE has been able to raise funds from sources including local businesses and a credit union to support symposiums on elder abuse and marketing and printed materials. In fact, its coordinator identified factors other than funding as

⁵¹ The sponsors were the AARP Foundation Elder Watch Denver, Home Instead Senior Care in Wheat Ridge, the Seniors' Resource Center, and Ralston Valley Preferred Real Estate.

necessary to keeping the network energized.⁵² The SCCAAN said its members were all involved with fighting elder abuse in their regular jobs and so did not need outside funding. The network's coordinator also believed the network was sustainable because it had been formed out of the AAA.

The ability to secure ongoing external funding seemed more critical for networks that used start-up grant money to pay for staff time. Due to the work of the Elder Abuse Law Enforcement Collaboration's (EALEC) investigator and other staff, the number of cases of elder abuse that were prosecuted in Hawaii County increased. However, after its multi-year federal grant ended, the Office of the Prosecuting Attorney reported that it did not have the funds to support the network's investigator, a retired police captain, and could only cover 25 percent of the time of the coordinator, a paralegal. Without the investigator, the number of prosecuted cases of elder abuse declined.

Some agencies began the networks with multi-year start-up federal funds that covered staff posts and later brought those positions in-house. In Denver, for example, the CASE (Communities Against Senior Exploitation) Partnership considered institutionalizing the coordinator's position to be an important factor contributing to the network's sustainability. A person involved in the network emphasized the importance of staffing, telling us: "There's turnover. To keep the mutual responsibility/accountability philosophy alive, you must staff it."

⁵² Patrick M. Bailey, *MDT's: What They Are, What They Do and How to Make Them Thrive*, (2012), available at <http://www.napsa-now.org/wp-content/uploads/2012/11/508.pdf>.

Many networks seek opportunities for replication

One of the primary ways that elder protection networks are started in places where they do not exist is through replication activities by existing networks. Many of the networks we studied are involved or interested in becoming involved in providing similar services beyond their original service area.

We found two successful state-wide replication strategies. In Virginia, the Attorney General's Office provides organizational support to Triads and distributes mini-grants of \$2,200 or less to Triads around the state. In addition to the AG's involvement, Virginia also has a State SALT Council, comprised mostly of elected members from local Triads and state agencies that provide administrative and financial support to Triads. Today Virginia has 40-45 active Triads, covering a large portion of the state.

We also found networks in their initial stages of replication. In Oklahoma, OK-CAFEE proposed developing or expanding FAST teams throughout the state.⁵³ Although the network has encountered challenges, as of the end of 2015, FAST teams were established in Tulsa and other communities, and it is estimated that a large portion of the state now has access to a financial protection network.

⁵³ Oklahoma Department of Human Services, *Strategic Plan SFY 2014–2015 Adult Protective Services*, (2015), available at <http://www.okdhs.org/OKDHS%20Publication%20Library/S14045.pdf>.

7. Conclusion and recommendations

We found that networks—whether focused exclusively on financial exploitation or more broadly on elder abuse—benefit older adults and the network’s members. Networks increase coordination and improve collaboration between responders, service providers and other relevant stakeholders. Networks improve the prevention, detection, reporting of and response to elder financial exploitation.

Networks now exist in hundreds of communities across the country, and there is considerable opportunity to create new networks in the many communities where they do not exist. For this reason, the Bureau has developed a set of recommendations for existing networks and key stakeholders to develop and enhance their community collaborative efforts to fight financial exploitation. Among these recommendations, the Bureau encourages the creation of networks where they do not exist. In areas with a network that does not include a financial exploitation component, the Bureau recommends networks to add activities designed to protect older community members from financial exploitation. For networks that are successfully combatting elder abuse, including financial exploitation, the Bureau urges them to seek to replicate their success and share their innovations and success stories with others. The Resource Guide issued with this report provides useful information and materials to help achieve these goals.

Recommendations

- Professionals working with or serving older adults should create networks in communities where they do not currently exist, especially in communities with a large number of older people.
- Members of existing networks should seek to expand resources and capacity as needed.

- Elder abuse networks that do not focus on financial exploitation should develop activities and the capacity to respond to elder financial exploitation by seeking to include as network members professionals with financial expertise, such as forensic accountants. Also, they should implement educational programs for older adults, caregivers, and professionals on how to prevent, detect and respond to financial exploitation.
- Elder financial exploitation networks should seek to include law enforcement as network members and to encourage their meaningful participation in network activities, including but not limited to educational or case review efforts.
- Because financial institutions are uniquely positioned to detect that an elder account holder has been targeted or victimized and to take action, elder financial exploitation networks should seek to include financial institutions, large and small, as network members. Similarly, financial institutions should seek to join and participate in local networks.
- To help ensure the network's long-term sustainability, financial exploitation networks should implement strategies to institutionalize the coordinator role as a permanent staff position.
- Networks in areas with older Americans of diverse linguistic, ethnic and racial backgrounds should seek to engage stakeholders that serve these populations and deliver educational and case review services relevant and appropriate to these populations.
- Networks should seek to expand coverage into rural areas by creating regional networks through which resources can be shared and by using teleconferencing and videoconferencing in lieu of travel when necessary.
- Networks engaging in educational activities, especially those networks with limited resources, should use existing federal, state and local educational resources.

APPENDIX A: METHODOLOGY

This report is based on a multiple-phased qualitative research effort carried out by the Library of Congress Federal Research Division (FRD) under the direction of the CFPB Office for Older Americans.⁵⁴ In addition, it includes quantitative analysis performed by the CFPB.

Qualitative research

The qualitative research was conducted in two phases. Phase 1 consisted of an extensive literature review of peer-reviewed articles, reports, and other resources such as resource guides and manuals related to multidisciplinary collaboration in elder abuse. In addition, the Library of Congress staff interviewed a number of researchers and experts including staff from the National Committee for the Prevention of Elder Abuse (NCPEA) and the National Center on Elder Abuse.⁵⁵ These experts provided a historical perspective of the evolution of networks and other forms of collaboration in the field, the existing state of research and best practices, and provided feedback on the questionnaire and the selection of case studies used in Phase 2.

Phase 2 of the project consisted of an in-depth qualitative study of 23 networks that included the three primary collaborative models/structures in the field: Triads, MDTs and other forms of collaboration.

To select the networks, the CFPB and FRD gathered information from publicly available lists of existing community efforts working on elder abuse and/or senior safety issues from the U.S.

⁵⁴ CFPB contracted with the Library of Congress through an Inter-Agency Agreement to conduct the qualitative portion of this study. CFPB staff participated in some of the interviews and case studies. Additionally, CFPB assisted FRD in compiling resources and analyzing the data. CFPB drafted the final report and Resource Guide using materials provided by FRD.

⁵⁵ These two organizations serve as technical assistance resource centers to many networks, and repositories of research and information on community interventions and multidisciplinary approaches.

Administration on Aging, NCPEA, and the National Sheriffs Association.⁵⁶ The CFPB and FRD then selected a “quasi-representative” sample of networks based on three criteria: (1) network type; (2) activities conducted; and (3) state. We selected triads and MDTs, as well as other networks that do not follow these two models. We also selected networks engaging in educational activities, case review, advocacy, and support services to victims. Lastly, we selected networks that would provide geographic diversity, and those ultimately selected operate in 15 different states. We validated our selections using the existing literature, brief conversations with some networks, web searches and the expert advice of researchers and other professionals in the field.

In order to capture the variety of forms of collaboration, the wide range of activities and membership, as well as the challenges faced and opportunities for creating or enhancing networks, we conducted two different types of case studies:

- **Full case studies:** a total of nine cases selected based on their publicly known work on financial exploitation issues, their geographic location, years of operation, and members’ and experts’ perceived level of engagement and effectiveness.⁵⁷ Each case involved site visits, observation of and participation in a group meeting, and one-hour long interviews with up to five professionals representing the members of the network. Additionally, for each case study, we reviewed materials and other documents such as bylaws, brochures, meeting agendas, etc.

⁵⁶ U.S. Administration on Aging, *Local Coalitions*, <https://ncea.acl.gov/whatwedo/practice/Teams-local.html> (last visited July 27, 2016); National Committee for the Prevention of Elder Abuse, *Coalitions*, <http://www.preventelderabuse.org/coalitions/> (last visited July 27, 2016); National Sheriffs' Association, *Locate a Triad*, <http://www.sheriffs.org/programs/locate-triad> (last visited July 27, 2016). While these lists do not specify whether a network works on financial exploitation, they represent the best available data for identifying existing networks that may do so.

⁵⁷ Information collection was conducted under CFPB’s Generic Clearance for Qualitative Consumer Education, Engagement, and Experience Information Collections (OMB# 3170-0036) (approved July 23, 2014).

TABLE 3: FULL CASE STUDIES

Triad	MDT/FAST	Other type
Broward County Triad, Florida	Houston FAST, Texas	New York City Elder Abuse Network, New York
Jefferson County Triad, Colorado	Los Angeles FAST, California	Illinois Older Americans Protection Network, Illinois*
Pickaway County Triad, Ohio	Orange County EDRT, California	Oklahoma County Coalition Against Financial Exploitation of the Elderly, Oklahoma*

*These networks also have a sub-team that operates as a FAST.

- Abbreviated case studies:** a total of 14 cases provided additional information about each type of network and allowed us to examine specific issues that were not covered sufficiently in the nine case studies. The networks studied included, among other things, networks with known involvement of financial institutions, networks with known involvement of faith-based organizations and consumers, newly formed networks, networks operating in rural communities, networks operating as part of a statewide system, and networks that have been in existence for 10 years or more. For each abbreviated case study the Library of Congress Federal Research Division (FRD) conducted a two-hour long interview with the network coordinator, and reviewed materials and documents such as bylaws, brochures and meeting agendas.

FRD conducted and transcribed the interviews. These notes were subsequently analyzed in conjunction with the CFPB. When necessary, follow-up interviews were conducted to clarify statements and findings, and to fill gaps in the information gathered. Besides forming the basis of this report, the literature review, expert interviews and case studies were used to gather information to develop a resource guide for the creation, enhancement and replication of networks.

TABLE 4: ABBREVIATED CASE STUDIES

Network	Area(s) of special focus in the interviews
Collaboration Against Abuse, Neglect and Exploitation, Ohio	Mature network, adaptation and sustainability
Colorado Coalition for Elder Rights and Abuse Prevention	Mature network
Communities Against Senior Exploitation Partnership, Denver, Colorado	Involvement of faith-based community
The District's Collaborative Training and Response for Older Victims, Washington, D.C.	Sustainability, involvement of prosecutors
Department of Aging and Adult Services Collaboration with the State Employees Credit Union (SECU), North Carolina	Involvement of financial institutions
Elder Abuse Law Enforcement Collaboration, Hawaii	Rural communities, meetings
Elder Financial Protection Network, California ⁵⁸	Involvement of financial institutions, sustainability
Fairfield County Elder Abuse Interdisciplinary Team, Ohio	Involvement of Adult Protective Services
Massachusetts Bank Reporting Project	Involvement of financial institutions
Northeast Kingdom Vulnerable Adult Action Coalition, Vermont	Rural populations and needs
Retiree Response Technical Team, Oregon	Consumer involvement
Southern Crescent Coalition Against Abuse and Neglect, Georgia	Development of a new network

⁵⁸ A Senior Program Analyst in CFPB's Office for Older Americans and member of the study team served as EFPN's CEO from 2001 to 2011.

Quantitative analysis

CFPB analyzed publicly available lists of existing networks working on elder abuse and/or senior safety issues from the U.S. Administration on Aging, NCPEA, and the National Sheriffs Association.⁵⁹ Using these lists, networks were classified as being focused on elder financial exploitation if they were a Financial Abuse Specialist Team or other network that lists financial exploitation, fraud and abuse in its name or mission. Networks that operate at the state level and networks focused exclusively on domestic violence or sexual abuse were excluded from the analysis.⁶⁰

To examine the presence of networks by county, we combined these lists with Census data on the number and percent of individuals age 65 and older by county.⁶¹ To account for networks that operate in multiple counties, the geographical analysis attributes their presence to all counties where they operate regardless of the physical location of their offices or meetings. Because the analysis was conducted at the county level, networks that operate in subdivisions of a county, but not throughout the entire county, are counted as having countywide coverage.

⁵⁹ U.S. Administration on Aging, *Local Coalitions*, <https://ncea.acl.gov/whatwedo/practice/Teams-local.html> (last visited July 27, 2016); National Committee for the Prevention of Elder Abuse, *Coalitions*, <http://www.preventelderabuse.org/coalitions/> (last visited July 27, 2016); National Sheriffs' Association, *Locate a Triad*, <http://www.sheriffs.org/programs/locate-triad> (last visited July 27, 2016). Additional research was conducted by CFPB to merge and remove duplicates from the networks on these lists.

⁶⁰ Because this report focuses on local communities' ability to prevent and respond to financial exploitation, we did not include networks that operate at the state level. We found that all states have at least one network that operates statewide.

⁶¹ Census Bureau, American Community Survey, Table S0103, 5-Year Estimates Population 65 years and over in the United States 2010-2014, http://factfinder.census.gov/bkmk/table/1.0/en/ACS/14_5YR/S0103 (last visited July 27, 2016).

Lastly, because the lists of networks were created at different points in time and maintained by different organizations, some of the networks used in the analysis may no longer be operating, and recently formed networks may not be accounted for in the analysis.

APPENDIX B: COMMON ACRONYMS

TERMS

AAA	Area agency on aging
APS	Adult protective services
EDRT/EFRT	Elder death review team/ Elder fatality review team
FAST	Financial abuse specialist team
FC	Forensic center
MDT	Multi-disciplinary team
NCEA	National Center on Elder Abuse
NCPEA	National Committee for the Prevention of Elder Abuse
SALT	Seniors and Law Enforcement Working Together
