

COMMONWEALTH OF MASSACHUSETTS

**ELDER FINANCIAL EXPLOITATION
AND FRAUD: IS IT A PROBLEM AND
WHAT SHOULD CREDIT UNIONS DO?**

Sponsored by

The Executive Office of Elder Affairs

&

The Massachusetts Credit Union League

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PRESENTATION OUTLINE

- **Overview and History**
- **What May Lead to Vulnerability**
- **What Is Financial Exploitation**
- **Potential Impact**
- **Impact of Alzheimer's Disease and other Cognitive Impairments**

PRESENTATION OUTLINE (Continued)

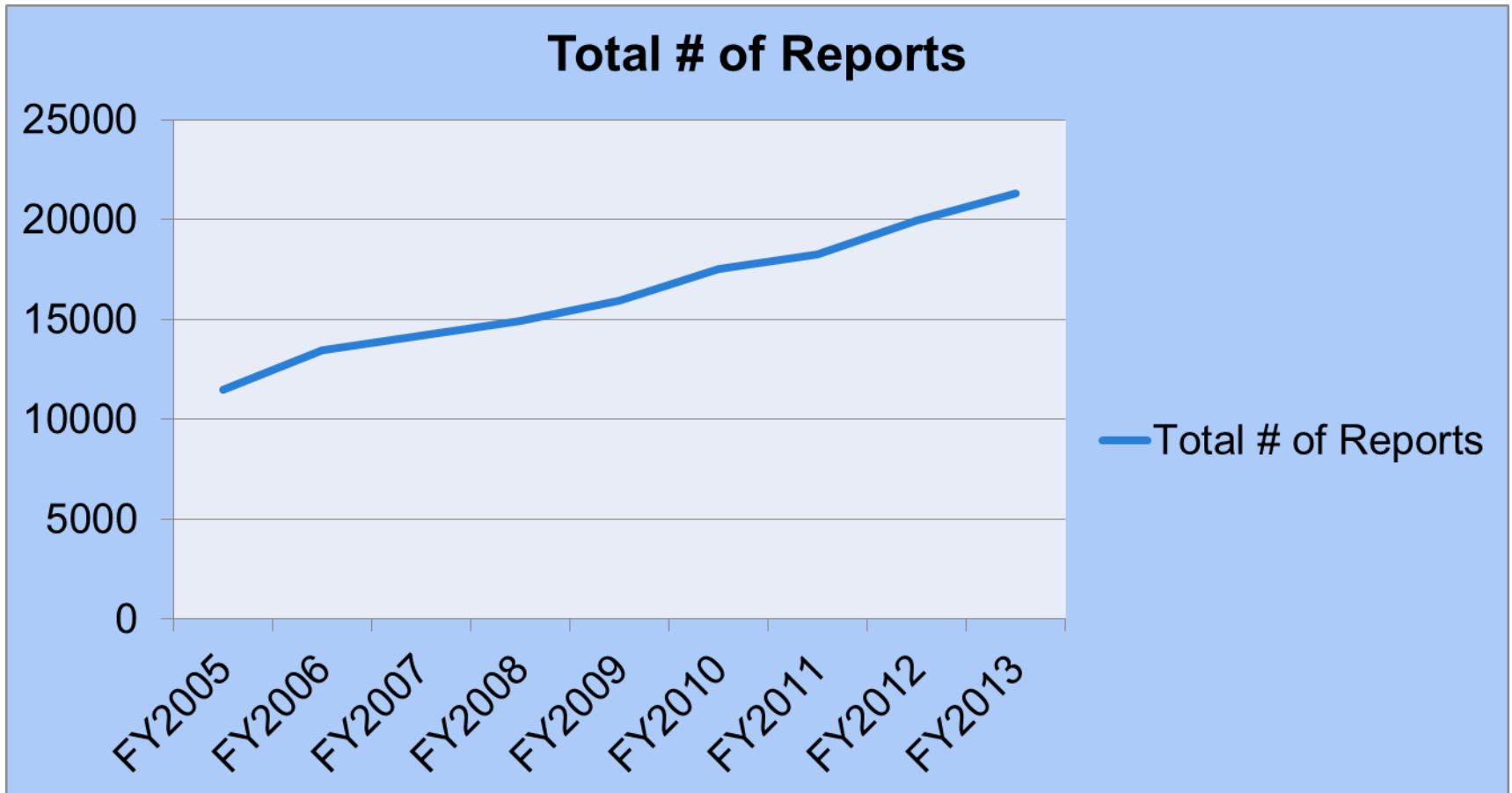
- **Role of the Credit Union**
- **How to Release Information**
- **Protective Services Process**
- **Resource Materials and Training**

OVERVIEW AND HISTORY

STATISTICS

- **Nationally recognized concern**
- **More than \$2.5 billion taken from elders nationally.**
- **Aging population**
 - **Those over age 65 has grown from 3.1 million in 1900 to 33.2 million in 1994**
 - **Expected to grow to 80 million by middle of 21st century**
 - **1 out of five Americans will be a 'senior' by 2030**

PROTECTIVE SERVICES REPORTS



STATISTICS (Continued)

- **Studies suggest that only 1 in 5 elder abuse situations gets reported to the appropriate authorities.**
- **For Massachusetts Protective Services reports for Fiscal Year 2013, more than one-third had some type of financial issue.**

STATISTICS (Continued)

- **Alzheimer's Disease and Other Cognitive Impairments**
 - **Significant impact on financial management**
 - **Only disease in top 10 with no way to prevent it, cure it or slow its progression**
 - **120,000 in MA have Alzheimer's Disease or a related disorder**
 - **More than 5 million nationally**
 - **1 in 8 Americans will develop Alzheimer's**
 - **By 2050, 16 million Americans will be living with disease**

PREVENTION AND EARLY DETECTION

- Prevention and Early Detection are *critical*
- Money disappears quickly
- Need to ‘stop the financial bleeding’
- Often irretrievable- little prosecution
- Life savings or ‘nest egg’ could be gone
- Potentially devastating consequences

THE MASSACHUSETTS BANK REPORTING PROJECT

- **Who are the ‘first responders’ for possible financial exploitation cases?**
- **Overview of the Project**
 - **A public/private/government partnership**
 - **Formally in place for:**
 - **Banks since 1996**
 - **Credit unions beginning in 2009**
 - **Financial planners beginning in 2013**
 - **Participation is voluntary**

THE MASSACHUSETTS BANK REPORTING PROJECT (Continued)

- **Overview of the Project (continued)**
 - **Goals**
 - **Commitment to prevention**
 - **Rapid and coordinated response**
 - **Simple protocol for reporting that maintains customer confidentiality**
 - **Greater cooperation and collaboration**

THE MASSACHUSETTS BANK REPORTING PROJECT (Continued)

- **Overview of the Project (continued)**
 - **Training Materials**
 - **Comprehensive training manual**
 - **Reporting protocol/guidelines**
 - **Releasing information**
 - **Warning signs**
 - **Interviewing elders**
 - **Elder resource information**
 - **Warning signs information**
 - **PowerPoint presentations**
 - **Information on Alzheimer's Disease**

***WHAT MAY LEAD TO
VULNERABILITY***

WHAT MAY LEAD TO VULNERABILITY

- **Potential contributors for elder include:**
 - **Changes in cognitive and/or physical functioning**
 - **Increased dependency on, or attachment to, others**
 - **Economic dependence on others**
 - **Financial changes or strain**
 - **Increased isolation**
 - **Trusting**
 - **Disbelief that they could be victimized**
 - **Embarrassment**
 - **Stress**

WHAT MAY LEAD TO VULNERABILITY

(Continued)

- **Potential contributors for elder include (continued):**
 - **History of family violence**
 - **Substance abuse and mental health**
 - **Afraid to speak out against family**
 - **Unwilling to get others 'in trouble'**
 - **Instilled beliefs, e.g. societal or religious**
 - **Lack of ability to seek assistance or advocate for self**
 - **Lack of services or services available not appropriate for their situation**

WHAT MAY LEAD TO VULNERABILITY

(Continued)

- **Potential issues for individual exploiting elder:**
 - **Financial dependency on elder**
 - **Financial and/or life changes or strain**
 - **Resides with and/or supported by elder**
 - **Overinvolved and/or need to control elder's affairs**
 - **Substance abuse, gambling and/or mental health issues**
 - **Unmarried and/or unemployed**
 - **Presence of other types of abuse or violence**

WHAT MAY LEAD TO VULNERABILITY

(Continued)

- **Potential issues for individual exploiting elder (continued):**
 - **Refusal to provide access to or alone time with the elder**
 - **Attempts to justify actions as their inheritance or 'owed' to them**
 - **Sense of 'entitlement'**
 - **Problematic relationship with other family members where elder is in the middle**
 - **Predatory characteristics- seeking out victims**
 - **Less than honest professionals or businesses**

WHAT MAY LEAD TO VULNERABILITY

(Continued)

- **Potential societal contributing factors include:**
 - **Inadequate education, training and/or awareness**
 - **Inadequate, incomplete and/or inappropriate advice from community professionals**
 - **Lack of resources and services to address the problem**
 - **Historical/societal/cultural views regarding elder financial exploitation and fraud**

WHAT IS FINANCIAL EXPLOITATION

FINANCIAL EXPLOITATION (651 C.M.R. 5.00)

- **A non-accidental act or omission by another, without the elder's consent:**
 - **That causes a monetary or property loss;**
 - **That causes a benefit to another that would normally benefit the elder; and/or**
 - **Where other person gains control of money or property without the elder's consent**

CATEGORIES

- **Suspect is known to the elder**
 - **Family**
 - **Friends**
 - **Acquaintances**
 - **Fiduciaries**
- **Suspect is not known to elder or is of a business nature**

EXPLOITATION BY FAMILY, ACQUAINTANCE OR FIDUCIARY

- **Misappropriation and/or mismanagement of income or assets**
- **Obtaining money, property and/or signatures via:**
 - **Threats or coercion**
 - **Undue influence**
 - **Deception or misrepresentation**
 - **Fraud**
- **Signing documents without the elder's consent**
- **Improper or fraudulent use of a Power of Attorney or fiduciary authority**

SCAMS AND EXPLOITATION BY STRANGERS

- **Sweepstakes, Prizes and Inheritances**
- **Grandparent Scam**
- **Mystery/Secret Shopper**
- **Insurance Scams**
- **Unscrupulous contractors, businesses or charities**
- **Internet, telemarketing and mail fraud**
- **Others- phishing, etc.**

METHODS OF EXPLOITATION

- **Deceit, trickery**
- **Using cognitive impairments**
- **Undue influence, pressure**
- **Guilt**
- **Using dependency**
- **Emotional threats, blackmail**
- **Physical threats, intimidation, fear**
- **Physical violence**

UNDUE INFLUENCE

- **Deprives an elder of independent judgment**
- **Substitutes another person's objectives for those of the elder**
- **Excessive insistence, mental or physical control**
- **Pressure applied based on authority, position or relationship**

POTENTIAL IMPACT

MORTALITY

- **Investigations looking at the relationship between elder abuse and mortality have found that abused elders die sooner.**

Dong, Simon, et. Al., (2009); Dong, Simon, Fulmer, et. al. (2011); Lachs et. al. (1998).

PHYSICAL IMPACT

- **Food**
- **Medical care, medications, medical equipment and/or supplies**
- **Insurance**
- **Home based services**
- **Basic household necessities**

EMOTIONAL IMPACT

- **Impact on ability to trust**
- **Embarrassment**
- **Fear**
- **Anxiety**
- **Depression**
- **Anger, frustration or hostility**
- **Impact on other mental health issues**

ENVIRONMENTAL IMPACT

- **Utilities**
- **Mortgage or rent**
- **Home repairs**
- **Homeowners insurance**
- **Home or yard maintenance**
- **Car payments or insurance**
- **Town/city taxes or other bills**

SHORT TERM VERSUS LONG TERM IMPACT

- **Ability to meet basic needs and pay bills**
- **Responsibility to pay back loans**
- **Credit history**
- **Impact if liens implemented**
- **Placement and long term care needs**

VICTIMS, FAMILY AND THE COMMUNITY

- **Impact often beyond just elder**
- **Family 'feuds' and accusations**
- **Elder used as a 'pawn'**
- **Lack of communication and/or trust**
- **Struggle over who will have control**
- **Isolation from family or community**
- **Financial problems for family or community**

***IMPACT OF ALZHEIMER'S
DISEASE AND OTHER COGNITIVE
IMPAIRMENTS***

FINANCIAL MANAGEMENT SKILLS

- **Fundamental Financial Activities**
 - **Cash transactions**

- **Financial Transactions- Complex Set of Activities**
 - **Paying bills**
 - **Checkbook management**
 - **Understanding statements**
 - **Financial judgment**

FINANCIAL MANAGEMENT AND COGNITIVE IMPAIRMENTS

- **Financial skills for those with Alzheimer's Disease are significantly impaired compared to healthy older adults.**
- **Half of those with mild Alzheimer's are capable of fundamental financial activities.**
- **Less than $\frac{1}{4}$ are capable of more complex financial activities.**

FINANCIAL MANAGEMENT AND COGNITIVE IMPAIRMENTS (Continued)

- By middle stages of the disease, *all financial capacities are severely impaired.*
- In many cases, financial capacity may be impaired well before a formal diagnosis or appearance of other disease symptoms.
- As such, it is critical to assess for early warning signs of a financial decline.

FINANCIAL MANAGEMENT AND COGNITIVE IMPAIRMENTS (Continued)

- Financial Management and Cognitive Impairments-
Reference Information**

Kasten, G, & Kasten, M. 'The Impact of Aging on Retirement Income Decision Making,' *Journal of Financial Planning*; June 2011

Marson, D, Sawrie, S et al, 'Assessing Financial Capacity in Patients with Alzheimer's Disease; A Conceptual Model and Prototype Instrument,' *Archives of Neurology*, 2000, Vol. 57:877-884.

Moye, J and Marson, D, 'Assessment of Decision-Making Capacity in Older Adults: An Emerging Area of Practice and Research,' *Journal of Gerontology: Psychological Sciences*, 2007, Vol. 62B, No. 1:3-11.

FINANCIAL MANAGEMENT AND COGNITIVE IMPAIRMENTS (Continued)

- **Additional information on warning signs of potential Alzheimer's Disease and its impact on financial management can be found at:**

<http://www.alz.org/10signs>

FINANCIAL MANAGEMENT AND COGNITIVE IMPAIRMENTS (Continued)

- **Highlights of ‘The 10 Warning Signs’ include (see website for more details):**
 - **Memory changes that disrupt daily life**
 - **Challenges in planning or budgeting**
 - **Difficulty completing familiar tasks**
 - **Decreased or poor judgment**

ROLE OF THE CREDIT UNION

FinCEN ADVISORY – FIN-2011-A003

- Older Americans hold a high concentration of wealth.
- Elderly individuals experience declining abilities, may find themselves more reliant on specific individuals for their physical well-being, financial management and social interaction.
- Anyone can be a victim of a financial crime such as identity theft, embezzlement, and fraudulent schemes, and certain elderly individuals may be particularly vulnerable.
- *Financial institutions can play a key role due to the nature of the client relationship.*

WARNING SIGNS

- **Financial institutions are in a key position to identify warning signs of financial exploitation, and the next several slides identify:**
 - **FinCEN Red Flags**
 - **Warning Signs information presented to banks, credit unions and financial planners in Massachusetts**

FinCEN RED FLAGS

- **Erratic or unusual banking transactions:**
 - **Frequent large withdrawals, including daily maximum withdrawals from ATM**
 - **Sudden NSF Activity**
 - **Uncharacteristic nonpayment for services, which may indicate a loss of funds or access to funds**

FinCEN RED FLAGS (Continued)

- **Erratic or unusual banking transactions (continued):**
 - **Debit transactions that are inconsistent for the elder**
 - **Uncharacteristic attempts to wire large sums of money**
 - **Closing of CDs or accounts without regard to penalties**

FinCEN RED FLAGS (Continued)

- **Interactions with customers or caregivers:**
 - **A caregiver or other individual shows excessive interest in the elder's finances or assets, does not allow the elder to speak for him/herself, or is reluctant to leave the elder's side during conversations.**
 - **The elder shows an unusual degree of fear or submissiveness toward a caregiver, or expresses a fear of eviction or nursing home placement if money is not given to caretaker.**

FinCEN RED FLAGS (Continued)

- **Interactions with customers or caregivers (continued):**
 - **The financial institution is unable to speak directly with the elder, despite repeated attempts to contact him or her.**
 - **A new caretaker, relative or friend suddenly begins conducting financial transactions on behalf of the elder without proper documentation.**
 - **The customer moves away from existing relationships and toward new associations with other 'friends' or strangers.**

FinCEN RED FLAGS (Continued)

- **Interactions with customers or caregivers (continued):**
 - **The elderly individual's financial management changes suddenly, such as through a change of Power of Attorney to a different family member or a new individual.**
 - **The elderly customer lacks knowledge about his or her financial status, or shows a sudden reluctance to discuss financial matters.**

OTHER POTENTIAL WARNING SIGNS

- **Financial Activity Inconsistent with Usual Patterns**
 - **Unusual changes in transaction patterns**
 - **Withdrawal or deposit pattern changes**
 - **Amount and/or frequency changes**
 - **Third party involvement**
 - **Unusual interest or appearance**
 - **Customer concerns**
 - **Confusion**
 - **Implausible explanations**
 - **Account modification concerns**
 - **Change of address**
 - **Co-Signer added**

OTHER POTENTIAL WARNING SIGNS

(Continued)

- **Observed, Questionable Interactions**
 - **Potential inappropriate influence**
 - **Use of fear, threats or intimidation**
 - **Level of discomfort**
 - **Attempts to control**
 - **Speaking over or for elder**
 - **'Helping' to sign**
 - **Behaviors and/or comments/statements by elder or other third party**

OTHER POTENTIAL WARNING SIGNS

(Continued)

- **Other Possible Financial Concerns**
 - **Requests to wire money**
 - **Requests for personal information**
 - **Social Security number**
 - **Account and PIN numbers**
- **See Warning Signs Placard for more information**

HOW TO RELEASE INFORMATION

WHAT IS OUR RESPONSIBILITY?

- **As a financial institution?**
- **As a community member?**

WHAT IS OUR RESPONSIBILITY?

(Continued)

- **The benefits of reporting suspected financial abuse of elders are far reaching.**
- **Reporting credit unions**
 - **Will provide an important service to the general public;**
 - **Demonstrate their commitment to the community that they serve; and,**
 - **Strengthen member relationships.**
- **Broad-based reporting efforts on the part of all financial institutions should serve as a deterrent to financial abuse and spare many elders the hardships that can accompany exploitation.**

MANDATED VERSUS NON-MANDATED REPORTERS

- **Financial institutions are not mandated reporters.**
- **Mandated reporters are required by law to file a report.**

NON-MANDATED REPORTERS

(M.G.L. 19A (15)(c) and (d))

- **‘Any other person may make such a report to the department or its designated agency, if any such person has reasonable cause to believe that an elderly person is suffering from or died as a result of abuse.’**
- **‘Reasonable cause to believe’ is only a suspicion.**

PRIVACY AND MEMBER CONFIDENTIALITY

- **Concerns of Credit Unions**
 - **Regulation P – Privacy/GLB**
 - **Lack of elder's information release form**
 - **Elder's refusal to provide information to help credit union employees to make a determination**

PRIVACY REGULATION

- **Limits instances when credit unions can release non-public personal information to a third party without the member's consent or opportunity to opt out.**

PUBLIC VS. NON-PUBLIC INFORMATION

- **Member's name and address are public information.**

However

- **A member's name and address associated with a particular financial institution is not (which means the fact that a member has a relationship with the credit union cannot be released to someone else).**

So, what should a credit union do?

REGULATION P - GLBA

- **GBL Section 502(e)(3)(B) and 15(a)(2)(ii)... ‘*the exception to opt out of releasing non-public personal information is made if to protect against or prevent fraud, unauthorized transactions, claims or other liability.*’**
- **This covers credit unions in reports of incidents of willful misuse, forgery, theft or deceit that result in taking funds without consent or to report incidents of obtaining an adult’s consent to sign over assets through misrepresentation of the intent of the transaction.**

INTERAGENCY GUIDANCE ON PRIVACY LAWS AND REPORTING FINANCIAL ABUSE OF OLDER ADULTS

- Clarifies privacy provisions of Gramm-Leach-Bliley Act (GLBA) concerning reporting suspected financial exploitation of older adults.
- Federal and State laws *require or encourage reporting of this information to authorities.*
- This guidance clarifies that reporting suspected financial abuse of older adults does not violate the privacy provisions of the GLBA, even when not complying with the notice and ‘opt-out’ requirements.

MGL 19A SECTION 15C- SAFE HARBOR RULE

‘Any financial institution that makes a disclosure of any possible violation of law or regulation or a disclosure pursuant to this section or any other authority...shall not be liable to any person under any law or regulation of the United States or any constitution, law or regulation of any State or political subdivision there of, for such disclosure.’

NON-MANDATED REPORTER PROTECTIONS (MGL 19A (15)(c) and (d))

- **Not liable in any civil or criminal action for filing provided:**
 - **Report filed in good faith**
 - **Did not perpetrate, inflict or cause abuse**
- **Cannot be discharged, demoted or be the subject of other disciplinary action due to the filing of a report.**
- **Confidentiality of the reporter's identity is maintained- only released with a report to the District Attorney**

WHAT CAN YOU RELEASE WITHOUT A CONSENT FORM?

- **Name of elder**
- **Address**
- **Phone number**
- **Age**
- **Existence of account relationships that are relevant to the report, such as: has a checking or share account, loan, safe deposit box (no account numbers)**
- **Name, address and phone of suspect, if known**
- **Description of the suspected abuse**
- **Reporting person's name**

TYPES OF DOCUMENTS TO ALLOW RELEASE OF MORE INFORMATION

- **Signed member's release of information form**
- **Court order**
- **Fiduciary appointment**
- **Subpoena**

THEN CREDIT UNION CAN RELEASE...

- Account numbers**
- Account statements**
- Photocopies of transaction documents**
- Elder's Social Security number or other identifying information**
- Information concerning previous visits to the credit union**
- Other relative information to the report**

PROTECTIVE SERVICES PROCESS

MASSACHUSETTS ELDER PROTECTIVE SERVICES PROGRAM

- The Executive Office of Elder Affairs provides oversight of the Program.**
- Elder is defined as age 60 and older.**
- Reports of abuse for those ages 18-59 where individual has physical or cognitive disability should go to the Disabled Persons Protection Commission (DPPC) at 1-800-426-9009.**

MASSACHUSETTS ELDER PROTECTIVE SERVICES PROGRAM (Continued)

- **Components of the Program**
 - **Elder Protective Services Programs**
 - **21 Programs across the Commonwealth**
 - **Based at Aging Services Access Points**
 - **Responsibilities include:**
 - **Intake**
 - **Investigation**
 - **Intervention**

MASSACHUSETTS ELDER PROTECTIVE SERVICES PROGRAM (Continued)

- **Components of the Program (continued)**
 - **Elder Protective Services Programs (continued):**
 - **Locate Program covering where elder lives:**
 - **Cross Listing by Town**
 - **1-800-AGE-INFO (1-800-243-4636)**
 - **www.800ageinfo.com**

MASSACHUSETTS ELDER PROTECTIVE SERVICES PROGRAM (Continued)

- **Components of the Program (continued)**

- **Elder Abuse Hotline**

- **During business hours, contact:**

- **local program**

- **1-800-AGE-INFO**

- **After business hours, weekends, holidays:**

- **calls answered and reports taken by Hotline**

- **More immediate issues paged out to Protective Services on-call staff for attention**

MASSACHUSETTS ELDER PROTECTIVE SERVICES PROGRAM (Continued)

- **Components of the Program (continued)**
 - **Guardianship Program**
 - **Four contract agencies**
 - **170 guardianship slots for Protective Services clients**
 - **Money Management Program**
 - **25 Designated Programs**
 - **1500 plus elders assisted per month**

TYPES OF ABUSE ADDRESSED

- **Physical Abuse**
- **Emotional Abuse**
- **Sexual Abuse**
- **Financial Exploitation**
- **Caregiver Neglect**
- **Self-Neglect**

PROGRAM PROCESS

INTAKE

INVESTIGATION

INTERVENTION

PROGRAM PROCESS Step 1

INTAKE

**Mandated versus Non-Mandated
Reporters**

**Reports Filed through PS Agencies or
Hotline**

**Screening - screened in for investigation
or screened out**



PROGRAM PROCESS Step 2

INVESTIGATION

Report Screened In
Gathering Information
Assessment of Risk
Legal Action as Appropriate and
Needed



PROGRAM PROCESS Step 3

INTERVENTION

Allegations Substantiated

Self Determination

Service Provision and Referrals

**Legal Action as Appropriate and
Needed**

***RESOURCE MATERIALS AND
TRAINING***

TRAINING AND REPORTING

- **Designate a point person (e.g. security officer, branch administration officer, or compliance officer) who will:**
 - **Review, document and report suspected exploitation**
 - **Facilitate development of internal credit union protocols**
 - **Raise awareness among and serve as a resource for credit union line staff**
 - **Serve as the liaison between the credit union and Protective Services and law enforcement**
 - **Participate in more comprehensive training on this issue**

TRAINING AND REPORTING (Continued)

- **The credit union should also:**
 - **Establish a relationship with the Protective Services agency in your area**
 - **Obtain training materials from the Executive Office of Elder Affairs**
 - **Develop a formal training program to assist branch managers and human resources managers in training employees to detect and respond to instances of exploitation, to train new employees and to conduct periodic refresher training**

TRAINING AND REPORTING (Continued)

- Urge credit union employees, particularly branch managers, member service representatives and tellers, to get to know elderly members and familiarize themselves with their banking habits.**
- Emphasize in staff meetings the importance of informing members of the consequences of their financial transactions, such as adding names to accounts or assigning power of attorney.**
- Exercise extra care to confirm that a third party is authorized to act on behalf of a member, such as carefully examining the documents of a court-appointed fiduciary or person acting with power of attorney.**

TRAINING AND REPORTING (Continued)

- Attempt to ascertain the reasons for large cash withdrawals or unusual banking activity or suggest that a member not complete a large cash withdrawal or accept a cashier's check if the transaction seems suspicious.**
- Suggest that the member discuss the transaction in private with a branch manager or a security officer.**

BEST PRACTICES

- **Have a point person in your institution designated to receive the information and who will contact Protective Services.**
- **No account numbers are given on first report.**
- **Just report what is going on- provide EXAMPLES and OBSERVATIONS**
- **Provide names of any other family members that Protective Services may be able to contact to help assist the elder**

BEST PRACTICES (Continued)

- **Develop a relationship with your local elder services office.**
- **If not sure whether a report should be made, call to CONSULT without releasing names or other identifiers.**
- **Even without disclosing confidential information, the credit union and the agency can together assess the situation and reach a joint conclusion as to whether a report should be made.**

AND REMEMBER

Protective Services

- Reports should *always* be made to the local Protective Services agency or to the Massachusetts Elder Abuse Hotline (1-800-922-2275)

Local Police

- Should *first* be called if a member appears to be in immediate physical or financial danger

SUGGESTIONS FOR CUSTOMER OUTREACH

- **Display member awareness and education brochures in branch lobbies**
- **Include informational materials in statements**
- **Include topic in community outreach efforts outside credit union setting**

CFPB RELEASES SERIES OF MANAGING SOMEONE ELSE'S MONEY GUIDES

- **Four easy to understand booklets for financial caregivers:**
 - **Powers of Attorney**
 - **Court-appointed guardians**
 - **Trustees**
 - **Government Fiduciaries (Social Security representative payees and VA fiduciaries)**

<http://www.consumerfinance.gov/blog/managing-someone-elses-money/>

RESOURCES

- **Training Manual**
- **PowerPoint training materials**
- **Warning Signs information**
- **Cross Listing of Protective Services Agencies by Town**

Above information available by contacting the Massachusetts Credit Union League or the Executive Office of Elder Affairs

RESOURCES (Continued)

Links to other community resources for elders include:

<https://www.800ageinfo.com>

AGEINFO (1-800-243-4636)

<http://www.mass.gov/elders>

Executive Office of Elder Affairs

1-800-922-2275

Massachusetts Elder Abuse Hotline

<http://www.alz.org/manh>

**Massachusetts-New Hampshire
Chapter of the Alzheimer's
Association**

1-800-272-3900

**24/7 Alzheimer's Association
Helpline**

RESOURCES (Continued)

Links to other community resources for elders include (continued):

<http://www.mass.gov/ago>

Attorney General's Office

<http://www.mass.gov/dph>

Department of Public Health

<http://www.mass.gov/dph/dhcq>

**Division of Health Care
Quality**

<http://www.mcoaonline.com>

**Massachusetts Councils of
Aging**

<http://www.janedoe.org>

Jane Doe

1-877-785-2020

**Safelink- Statewide
Domestic Violence Hotline**

QUESTIONS?