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# PROGRAM MEMO

**TO:** Area Agencies on Aging (AAA)**NO:** PM 21-09**DATE ISSUED:** Revised: June 10, 2021**EXPIRES:** When superseded**SUBJECT:** Older Americans Act Performance System (OAAPS) Update**EXPIRES:** When superseded**SUPERSEDES:** N/A**PROGRAMS AFFECTED:** Older Americans Act (OAA), Title III (B, C-1, C-2, D, E)**Purpose**

This Program Memo provides information regarding upcoming changes to the federal Administration for Community Living's (ACL) reporting requirements for Older Americans Act programs authorized under Title III (B, C-1, C-2, D, and E), effective July 1.

The required data must be submitted to the California Aging Reporting System (CARS) for the annual State Performance Report (SPR), which the California Department of Aging (CDA) submits to ACL.

The following related documents are available on the [California Department of Aging's website](#):

- A list of all the upcoming reporting changes, including those involving Legal Assistance.
- The CARS technical specifications for affected programs. This includes a key showing numbers for each Legal Assistance case type.
- Updated sample intake forms for Title III programs.
- Sample Legal Assistance reporting templates for upload to the CARS. Note: Each AAA should contact its data vendor to determine whether these templates should be used.
- Legal Services codes crosswalk to SPR case types.

**Data Vendors**

AAAs should contact their data vendors regarding training opportunities or questions specific to their internal data systems. CDA has been in contact with the three major vendors, AssureCare, RTZ Associates, and WellSky. Each vendor is preparing for the upcoming reporting changes and planning some level of orientation regarding their system changes.

## **Timing**

- The new data requirements take effect for Federal Fiscal Year (FFY) 2022 (October 1, 2021—September 30, 2022).
- Because California collects OAA Title III data based on the State Fiscal Year (SFY), CARS will implement the new reporting requirements on July 1, 2021.
- AAAs and other providers will need to update intake forms by July 1, 2021 to capture the required data.
- Data must be input into CARS by October 31, 2021 for the first quarter of FFY 2022.
- Data systems that feed into CARS should be updated in time to meet the October 31, 2021 reporting deadline.

## **Legal Assistance**

Currently, AAAs submit aggregate Legal Assistance data using the California Legal Services Quarterly Aggregate Report Form: CDA 1022. This form should be used to report work completed through the fourth quarter of SFY 2021, which ends on June 30, 2021. After SFY 2021, CDA will no longer accept the 1022. (AAAs also currently submit some data related to Legal Assistance directly to CARS.)

Beginning with the first quarter of FFY 2022, ACL will classify Legal Assistance as a “restricted” service rather than a non-registered service. As a restricted service, AAAs will need to submit specified data, including demographic data, for each case rather than submitting aggregate data. Client names will not be required, and CDA will not have access to the case-level data once it is uploaded to CARS.

CDA suggests that each AAA use one of the following options to submit the newly required Legal Assistance data to CARS:

1. Reporting templates developed by RTZ Associates
  - Data can be entered directly into these templates, which are Excel spreadsheets, and uploaded to CARS; or
  - Either the AAA or the Legal Services Provider (LSP) may be able to create an automated report that will upload the required data to the template from the LSP’s internal data system. AAAs should consult with their data vendors or their internal IT staffs regarding this approach.
2. The AAA’s existing data system
  - If the AAA’s internal data system has been configured to accept the required Legal Assistance data, the AAA can enter the data into its internal data system as it would for other Title III services and upload it to CARS.
  - AAAs should consult with their data vendors to determine whether this will be possible.

## **Unique IDs**

- ACL will now require Case Unique IDs and Client Unique IDs.
- These unique IDs must:
  - Include the PSA number
  - Be alphanumeric
  - Not exceed 50 characters
  - Not allow duplication (including for those AAAs that contract with more than one Legal Services Provider)

**NOTE:** For those AAAs that contract with more than one LSP, the Legal Assistance data must be combined into a single report prior to being submitted to CARS.

## **Deadlines**

Quarterly reporting deadlines will not change. Each AAA will continue to submit data reports for OAA-funded programs, now including Legal Assistance, on the schedule outlined in the Area Plan Contract, Exhibit E, Article II.

## **Inquiries**

If you have questions, please contact [DataTeam.Reports@aging.ca.gov](mailto:DataTeam.Reports@aging.ca.gov) or Ellen Goodwin, [ellen.goodwin@aging.ca.gov](mailto:ellen.goodwin@aging.ca.gov).

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