

Legal Assistance Provider SPR Tool (LAPST)

Frequently Asked Questions

Version 1.3

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What is OAAPS?

The Older Americans Act Performance System (OAAPS) is the Administration for Community Living (ACL)'s system for collecting data about Older Americans Act (OAA) program participants, services, and expenditures provided pursuant to Titles III, VI and VII of the OAA. This data is collected and reported in State Performance Reports (SPRs). Legal assistance performance data is among the many data sets reported in OAAPS. State Units on Aging (SUAs) and Area Agencies on Aging (AAAs) provide information on these activities to ACL through OAAPS.

SUAs and AAAs may find additional resources and information via the OAAPS website.

Legal Assistance SPR Resources

- Legal Assistance SPR Guidebook: The Legal Assistance SPR Guidebook contains
 information and descriptions of the components of the reporting process, information
 on data to be reported, including case type definitions, service levels, service unit,
 and required data elements. The guidebook is available to SUAs and AAAs via the
 Resources section of the OAAPS website after logging in.
- Legal Assistance Provider State Performance Report Tool (LAPST): LAPST is a programmed Microsoft Excel tool created by ACL and designed to aid legal assistance providers funded under Title III-B of OAA in preparing SPRs. The LAPST is intended solely for use by the providers. Directions for using LAPST are available within the tool. LAPST is posted in the Resources section on OAAPS, which can be found after you log into the system. AAAs and SUAs are encouraged to share the tool and other ACL resources with any of their contracted legal service providers. Legal assistance providers may also request a copy of the LAPST, as well as technical assistance on the SPR reporting requirements and collection and reporting methods, by contacting the OAAPS Help Desk.
- Legal Services Corporation (LSC) Cross Walk to ACL State Performance Case Types Guide: The LSC Codes Cross Walk to ACL SPR Case Types Guide offers guidance for legal assistance providers to better understand how LSC case codes correspond with SPR data case types. The guide is available in the Resources section on OAAPS, which can be found after you log into the system. AAAs and SUAs are encouraged to share the guide and other ACL resources with any of their contracted legal service providers. Legal assistance providers may also request the document by contacting the OAAPS Help Desk.

Frequently Asked Questions

1. What is the Legal Assistance Provider SPR Tool (LAPST) and how does it help legal assistance providers in collecting and reporting Legal Assistance SPR data?

LAPST is a Microsoft Excel tool created by ACL and designed for legal assistance providers funded under Title III-B of the Older Americans Act. The tool may be used to assist in aggregating, deidentifying and formatting Legal Assistance SPR data reports. LAPST produces an OAAPS-compatible report the legal assistance providers can send to the AAA or SUA to upload directly into the OAAPS portal.

2. Who can use LAPST?

Legal assistance providers may choose to use LAPST to prepare their SPRs.

3. How does LAPST work?

The tool works in one of two ways depending upon how legal assistance providers choose to manage case and client data. Providers may enter their case-level data according to the directions contained within LAPST and the tool will then deidentify and aggregate the case-level data into required data categories. Alternatively, providers may enter already aggregated and deidentified data directly into LAPST. Either method produces an OAAPS-compatible data upload sheet.

4. Does LAPST calculate or capture an unduplicated count of legal assistance clients?

The unduplicated client count is generally calculable by case-management systems used by legal assistance providers. The unduplicated count total can be entered directly into LAPST. ACL notes, however, that if a provider enters case-level data into LAPST, it will produce an unduplicated count of clients such that clients with multiple cases are only counted once in the unduplicated count.

5. How do Title III-E providers report financial and legal counseling services in their SPRs?

Title III-E supplemental services in the domains of legal and/or financial consultation are reported in the Title III-E SPR and should not be reported in the Title III-B Legal Assistance SPR. Reporting of unduplicated clients receiving caregiver legal and/or financial consultation occurs in the Title III-E section in OAAPS. Legal and/or financial consultation provided by a lawyer or under the direction of a lawyer is subject to the applicable rules of professional

conduct in each state and to Restrictive Service requirements prohibiting disclosure of personally identifiable information about clients.

6. Can LAPST be customized for legal assistance providers?

ACL cannot customize LAPST for legal assistance providers. Providers can edit and customize the tool to best fit their needs, as long as the functionality to produce a template report for upload into OAAPS is not disabled. ACL cannot support state-customized versions of LAPST.

7. Can LAPST be uploaded into OAAPS?

No, LAPST is a tool for generating reports called "Legal Assistance Data Upload Templates" that are fully formatted with all data deidentified and aggregated. These reports cannot be uploaded into OAAPS.

8. Can AAAs or SUAs use LAPST?

AAAs and SUAs do not use LAPST. The role of AAAs or SUAs is to receive the OAAPS-compatible data upload sheet that the tool produces from legal assistance providers.

9. Will aging network software vendors have any obligations regarding the Legal Assistance Provider SPR Tool?

No, only legal assistance providers who will in turn submit the data to their AAAs or SUAs have any obligations regarding LAPST. To ensure client confidentiality, LAPST should only be used by legal assistance providers.

10. How is legal assistance data reported and uploaded into OAAPS?

Legal assistance providers must collect all required data and use their case management systems to record the data. All the required SPR data are client- and case-relevant and accordingly would be collected in the normal course of business by legal assistance providers. Providers must deidentify and aggregate their Legal Assistance SPR data before submitting reports to their AAA or SUA, who is then responsible for uploading these data into OAAPS. Consistent with rules of professional conduct for lawyers and employees working under lawyer supervision in all states, ethical obligations preclude any disclosure of client-identifying information. ACL's SPR reporting requirements likewise do not permit the

inclusion of personally identifiable information in the data reports provided to SUAs for OAAPS submission.

11. What is the legal assistance service type categorization in OAAPS?

Legal assistance is categorized as a Restricted Service type in OAAPS. Only in Restricted Service Reporting, the SPR data is segregated from all other Title III, VI and VII SPR data. The definition of a Restricted Service is a service provided using OAA funds in whole or in part for which demographic and consumer characteristics are reported in aggregated and personally identifiable information (PII) is not shared or recorded beyond the legal assistance provider level. Restricted Service data are not aggregated with SPR data from any other Title III, VI or VII reports.

12. How should legal and/or financial consultation provided with OAA Title III-E supplemental caregiver funding be reported in SPRs?

Title III-E caregiver services include a supplemental benefit called "financial or legal counseling" for caregivers. This service is a Title III-E Registered Service, differing from the legal assistance Restricted Service reporting category. Legal and/or financial consultation is one Service Domain under supplemental services to caregivers.

13. Are legal assistance providers required to submit their data to the AAA or SUA in a specific format?

ACL recommends that legal assistance providers submit their deidentified, aggregated data formatted into required corresponding SPR data element categories (e.g., service level, case type, etc.) to their SUA in a report format compatible with OAAPS. Providers should coordinate with their SUA regarding the required format in which they submit reports that are ready for upload into OAAPS. Providers may use any system to produce the report as long as this preserves client confidentiality, in accordance with lawyers' legal and ethical duties. LAPST creates a report that is formatted to be ready for SUAs to upload into OAAPS.

14. How do AAAs and/or SUAs upload data received from legal assistance providers?

General instructions on how AAAs and/or SUAs can upload Legal Assistance (Restricted Service) data can be found in the Resources section on OAAPS. The upload template forms can also be found in the Resources section on OAAPS. A SUA can upload Legal Assistance SPR data elements separately, using the merge option if they have more than one report to submit and only the legal assistance fields will be updated.

15. Which legal assistance cases are included in the annual open case count?

The annual open case count includes the total number of cases open at the close of business on the last day of the previous reporting period (the federal fiscal year, or FFY). This is true regardless of when those cases were open.

A case is open beginning on the date when an individual presents to legal aid and is screened through intake and/or a consultation is offered to that individual. In other words, a case is open when any level or degree of service is performed. A case remains open until it is closed.

16. Are legal assistance providers required to report a count of cases and a count of clients?

The SPR Legal Assistance data reporting requirements include an aggregated count of cases opened, an aggregated count of cases closed, and an unduplicated count of clients served during the reporting period, the FFY. ACL recognizes and expects that many legal assistance clients present to a legal assistance provider and receive legal services related to more than one legal issue during a reporting period. This inherently results in multiple cases for a single client. Each of these cases is captured in the case count, with the client counted only once in the client count.

17. How are legal assistance providers required to report poverty status?

Legal assistance providers are required to report a client's poverty status as either "at or below poverty" or "above poverty" based on the federal poverty guidelines issued by the Department of Health and Human Services (HHS). Incomes "at or below poverty" are those at 100% of the Federal poverty guideline and lower. Federal poverty guidelines are updated and issued annually and available at the <u>ASPE Poverty Guidelines web page</u>. LAPST does not automatically calculate poverty status and the legal assistance provider must account for poverty status and may do so using information available at the above link.

18. Does LAPST identify rural versus non-rural geography status?

The tool uses ZIP codes to determine the associated Rural-Urban Commuting Area (RUCA) code and automatically determine whether the client resides in a rural or non-rural area.

19. How do legal assistance providers report sex?

ACL requires legal assistance providers to report on a client's sex in one of three SPR categories:

- Female
- Male
- Sex Missing

Any data entries other than "Female" and "Male" will be counted as "Missing." For this reason, providers are asked to use ACL-provided options to the extent possible to avoid potential data or reporting errors.

20. How do legal assistance providers report race?

Legal assistance providers can report on a client's race using the following SPR categories:

- American Indian or Alaska Native
- Asian or Asian American
- Black or African American
- Native Hawaiian or Pacific Islander
- White
- Persons reporting some other race
- Persons reporting 2 or more races (unduplicated count)
- Race missing

The unduplicated number of people that selected two or more race options should be reported in the option titled "Persons reporting 2 or more races (unduplicated count)." For example, if a client selects both "Asian" and "Other" for race, they should be reported as:

- Asian or Asian American: 1
- Persons reporting some other race: 1
- Persons reporting 2 or more races (unduplicated count): 1

21. How do ACL SPR data case types compare to Legal Services Corporation (LSC) case codes?

ACL SPR data case types align with Older Americans Act priority areas as iterated in OAA §307(a)(11)(E). These case types do not align exactly with LSC data codes and some case types do not have corresponding LSC data codes. Therefore, ACL recommends that legal assistance providers determine the case type using ACL case types.

22. How can legal assistance providers cross walk LSC case codes to ACL case types in LAPST?

Legal assistance providers that use LSC case codes may enter them into LAPST and the tool will suggest an ACL case type based on the code. If an LSC code does not correspond to an ACL case type, the case will be categorized as "Other/Miscellaneous." Providers that do not use LSC codes should use the case type column and leave the LSC code column blank when entering their case-level data.

23. If data are incorrectly reported, can they be resubmitted or edited?

Because legal service providers do not have access to OAAPS, if a legal assistance provider realizes that an SPR is incorrect, that provider should immediately contact their SUA. SUA personnel uploading the data may make corrections within OAAPS and can choose to redownload previously uploaded files to access them and revert their data if needed.

Version Control

Version	Date published	Changes from previous version
1.0	05/10/2021	Original version
1.1	11/01/2023	Updated Q&As
1.2	11/13/2024	Updated resources and Q&As
1.3	05/01/2025	Updated Q&As