NYC Department for the Aging

Legal Assistance to Older New Yorkers

Standards of Operation and Scope of Services

Based on standards set by the New York City Department for the Aging and the New York State Office for the Aging

Updated August 2026

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SECTION 1. INTRODUCTION

A. Legal Authority and Funding[1]

The Federal Older Americans Act ("OAA")[2] designates legal assistance as a priority service funded under Title III-B.[3] The New York State Office for the Aging ("NYSOFA") is responsible for the overall administration of the program, while direct legal services to older individuals are funded at the local level through Area Agencies on Aging ("AAAs") and provided by their Legal Assistance Providers ("Legal Assistance Providers" or "Providers").

Since legal assistance is a priority service mandated by the OAA, each of the 59 AAAs in the state of New York, including the New York City Department for the Aging ("NYC Aging"), must operate a Legal Assistance Program. Legal services offered through the program shall be accessible and available to those individuals aged 60 and over and identified as living in greatest economic and social need throughout an AAA's planning and service area.

B. Program Purpose[4]

Legal assistance, as defined by the OAA:

(A) Means legal advice and representation provided by an attorney to older individuals with economic or social need; and
(B) Includes—
   - (i) to the extent feasible, counseling or other appropriate assistance by a paralegal or law student under the direct supervision of an attorney; and
   - (ii) counseling or representation by a non-lawyer where permitted by law.[5]

Thus, the Legal Assistance to Older New Yorkers Program ("Legal Assistance Program") is an advocacy program providing older individuals with legal advice and representation, including but not limited to representation in court and administrative proceedings. An older individual is an individual who is 60 years of age or older.[6]

The regulations promulgated pursuant to the OAA by the U.S. Department of Health and Human Services require all Title III services to be provided without the use of any means testing.[7] The term "means test" is defined in this context as "the use of the income, assets, or other resources of an older person, family caregiver, or the households thereof to deny or limit that person's eligibility to receive services" under the Legal Assistance Program.[8]

With regard to Legal Assistance Providers, the regulations state:

(A) A legal assistance provider may not require an older person to disclose information about income or resources as a condition for providing legal assistance under this part.
(B) A legal assistance provider may ask about the person's financial circumstances as a part of the process of providing legal advice, counseling and representation, or for the purpose of identifying additional resources and benefits for which the person may be eligible.[9]

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[1] Source: New York State Office for the Aging Program Instruction, Statewide Standards for the Delivery of Legal Assistance to Older New Yorkers, 94-PI-52, issued December 29, 1994 (hereinafter 94-PI-52) found at: https://aging.ny.gov/system/files/documents/2025/07/94-pi-52-statewide-standards-for-delivery-of-legal-assistance.pdf

[2] Older Americans Act of 1965, Public Law No. 89-73, as amended by P.L. 116-131

[3] 42 U.S.C. § 3026(a)(2); OAA § 306(a)(2)

[4] 94-PI-52

[5] 42 U.S.C. § 3002(33); OAA § 102(33)

[6] *Id.*, § 3002(40); OAA § 102(40)

[7] 45 CFR § 1321.9(c)(2)(x)(E)

[8] *Id.*, § 1321.3

[9] *Id.*, § 1321.93(f)(2)(xi)(A), (B)

Balancing the statutory focus of serving those in greatest economic and social need against the regulatory prohibition on means testing is accomplished by serving target populations within the AAA's service area and establishing case priorities to meet the needs of those populations.[10]

[10] For a more detailed discussion, *see, generally, Comprehensive Guide to Delivery of Legal Assistance to Older Persons,* Chapter V, Targeting, Priority Setting, and Means Testing, The Center for Social Gerontology (1988).

SECTION 2. STANDARDS FOR THE LEGAL ASSISTANCE PROGRAM

The Legal Assistance Program is an advocacy program providing legal advice and representation, including representation in court, to older adults with financial and social need who otherwise would not be able to obtain the services of an attorney. The role of the Title III-B Legal Assistance Program is to identify and serve the civil legal needs of those older people who are most vulnerable due to social and/or economic circumstances, particularly those who are frail, isolated and/or minorities. This program may be provided through legal information, legal community education and/or direct legal representation on matters affecting income security, health care, long term care, nutrition, housing, utilities, protective services, defense of guardianship, abuse, neglect, and age discrimination. Legal Assistance Providers help older adults to understand their rights, exercise options through informed decision-making, and achieve optimal benefit from the support and opportunities promised by law.[11]

Standard 1: Required Qualifications of the Legal Assistance Provider[12]

The program must be eligible.

Compliance 1.1. The Legal Assistance Provider must be one of the following:

- A Legal Services Corporation grantee;
- A not-for-profit corporation organized for the delivery of legal assistance (as defined in Section 1.B above);
- A private law firm licensed to practice law in New York State;
- A private attorney licensed to practice law in New York State; or
- A social services agency that has an identifiable legal component independent from the agency (a unit within the agency directly supervised by an attorney would most likely meet this requirement).

Compliance 1.2. The Provider may engage the services of a paralegal and/or law student to provide counseling or other appropriate assistance (as defined above in Section 1.B). A paralegal or law student providing assistance must be under the direct supervision of an attorney who must be accessible to the client, able to render direct legal advice, and represent clients in court proceedings.

Compliance 1.3. The selected Legal Assistance Provider(s) must exhibit the capacity to:

- Retain staff with expertise in specific areas of law affecting older adults with economic or social need, including the priority areas identified in the OAA (for example, public benefits, institutionalization, and alternatives to institutionalization);
- Demonstrate expertise in specific areas of law that are given priority in the OAA, including income and public entitlement benefits, health care, long-term care, nutrition, consumer law, housing, utilities, protective services, abuse, neglect, age discrimination, and defense of guardianship, prioritizing focus from among the areas of law based on the needs of the community served;
- Provide effective administrative and judicial advocacy and representation in the areas of law affecting older adults with the greatest economic or social need;
- Support other advocacy efforts (for example, the Long-Term Care Ombudsman Program);
- Effectively deliver legal assistance to institutionalized, isolated and homebound older adults; and
- Provide legal assistance in the principal language spoken by clients in areas where a significant number of clients do not speak English as their principal language.[13]

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[11] *See* NYSOFA Technical Assistance Memorandum, No. 10-TAM-02 at: https://aging.ny.gov/system/files/documents/2019/10/10-TAM-02-Legal-Assistance-Program-Who-May-be-a-Provider.pdf

[12] 94-PI-52

[13] 45 CFR §1321.93(d); NYSOFA Technical Assistance Memorandum, No. 10-TAM-02

Compliance 1.4. If the Provider is not a Legal Services Corporation (LSC) grantee, it is required to coordinate its services with those of the LSC grantee and it is subject to the federal regulations applicable to LSC grantees to the extent determined appropriate by the Administration on Aging.[14]

Compliance 1.5. A Provider may not be either a full-time or part-time County Attorney. Older adult clients seeking representation against a county and its agencies must be assured that the Provider will be able to represent their interests without conflict.[15]

Standard 2: Target Population[16]

The program serves its target population.

Compliance 2.1. To meet the statutory and regulatory program requirements, while recognizing that resources under the OAA are limited, the Legal Assistance Provider must target legal assistance to particularly needy populations throughout NYC Aging's planning service area. Particularly needy persons, as specified in the OAA, include those in greatest economic or social need, low-income minorities, and rural elders.

The OAA defines "greatest economic need" as "the need resulting from an income level at or below the poverty line."[17] "Greatest social need" is defined by the OAA as:

> ...the need caused by noneconomic factors, which include-
> - physical and mental disabilities;
> - language barriers; and
> - cultural, social, or geographical isolation, including isolation caused by racial or ethnic status, that restricts the ability of an individual to perform normal daily tasks; or which threatens the capacity of the individual to live independently.[18]

Compliance 2.2. Targeted populations should include, but not be limited to, older New Yorkers who:

- Are residents of nursing homes;
- Are residents of adult homes;
- Have assisted living needs or are in an assisted living arrangement;
- Have chronic health problems;
- Have particular problems of access to health care;
- Are homeless, or threatened with homelessness;
- Live on a subsistence income, or are threatened with the loss of subsistence income;
- Have language barriers;
- Are proposed for or under guardianship;
- Are victims of abuse, neglect or exploitation (including fraudulent and deceptive financial and consumer practices); and/or
- Are physically isolated.

The above listing of targeted populations is not intended to be exhaustive, mandatory, or in priority order but represents a range of possibilities that should be utilized by the Provider when targeting services and establishing case priorities.

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[14] OAA § 307(a)(11)
[15] *See* NYSOFA Technical Assistance Memorandum, No. 10-TAM-02
[16] 94-PI-52
[17] 42 U.S.C. § 3002(23); OAA § 102(23)
[18] *Id.*, § 3002(24); OAA § 102(24)

Standard 3: Case Priorities[19]

The program serves its priority areas.

NYC Aging has established case priorities for Legal Assistance Providers that will best meet the needs of the targeted groups, as specified by the Older Americans Act Reauthorization of 2020.[20]

- **Income and Benefits**: Social Security, Supplemental Security Income, Pooled income trusts, HEAP, SCRIE, railroad retirement benefits, workers' compensation, veteran's benefits, unemployment compensation, pensions.
- **Nutrition**: Supplemental Nutrition Assistance Program.
- **Health care**: Medicaid, Medicare, COBRA, and other insurance issues.
- **Long-term care**: Advanced LTC planning, nursing and adult home issues (institutionalized older adults).
- **Consumer and Utilities**: Collections, contracts and warranties, non-health insurance issues, taxes, loan and installment purchases, utility shut-offs, energy issues.
- **Housing**: Tenant issues, foreclosure, home repair fraud, home ownership/real property, reverse mortgages, home equity conversion, deed theft, predatory lending, homelessness.
- **Guardianship/Protective Services**: Defense of guardianship.
- **Abuse/Neglect**: Representative payee, abuse cases, financial exploitation.
- **Age Discrimination**: Discrimination in housing, employment, services and credit based on age.

Standard 4: Other Issues[21]

The program assists older adults in matters involving personal autonomy.

In addition to the Case Priorities specified in the Standard 3 list above, there are other issues that are of importance and concern to older New Yorkers. These issues fall into the category of preserving personal autonomy.

Matters involving the preservation of personal autonomy include the preparation of powers of attorney, health care proxies, do not resuscitate orders, and even wills. These are matters that are of as much importance to those of limited means as they are to those of comfortable means. The Legal Assistance Provider may be contacted to assist the older individual in such cases. Cases concerning preserving personal autonomy are often fee generating, however, and may not, ordinarily, be undertaken by the Legal Assistance Provider[22]. The Provider may explore the possibility of utilizing *pro bono* and reduced fee panels as a means of meeting the demand for assistance in this area while preserving limited financial resources to address the priority issues specified above.

Standard 5: Communications and Consultation[23]

The program communicates and consults with NYC Aging.

Compliance 5.1.

Good communication between NYC Aging and the Legal Assistance Provider is essential to the success of the Legal Assistance Program. Therefore, in order to comply with the purposes of the program and meet the needs of the target populations, NYC Aging and the Provider shall engage in ongoing dialogue on how to best:

- Formally establish case priorities that reflect local needs of the target population, taking into consideration those issues

[19] 94-PI-52

[20] 42 U.S.C. § 3026(a)(15); OAA § 306(a)(15)

[21] 94-PI-52

[22] *See*, 45 CFR § 1321.93(f)(3)(i); 45 CFR § 1321.93(f)(3)(i)(a)

[23] 94-PI-52

specified in these standards;
- Foster cost-effective, high-quality services having maximum impact on these priority issues;
- Assure the accessibility of the Legal Assistance Program through planning and the service areas served by NYC Aging;
- Collaborate with NYSOFA, other AAAs and Legal Assistance Providers to serve the legal needs of Older New Yorkers; and
- Develop and maximize the use of other resources to expand the provision of legal assistance to the older adults.

Compliance 5.2. NYSOFA, upon request, will provide technical assistance to NYC Aging and the Providers in meeting the requirements of this section.

Standard 6: Data Collection and Reporting

The program accurately reports client and service information in NYC Aging's client tracking system.

Compliance 6.1. The Legal Assistance Provider must utilize the NYC Aging client tracking system to record all required data elements and to document service units. At minimum, the Provider must collect all data elements in accordance with the Administration for Community Living's ("ACL") requirements for the State Performance Report ("SPR")[24], including:

- Date of birth (will be generated on the SPR as age distribution)
- Gender (will be generated on the SPR as sex distribution)
- Address (will be generated on the SPR as geographic distribution, i.e., rural or non-rural)
- Income (will be generated on the SPR as poverty status distribution, i.e., at or below poverty line or above poverty)
- Lives With (will be generated on the SPR as household status distribution, i.e., lives alone, with others, or in a long-term care facility)
- Ethnic heritage and Race (will be generated on the SPR as ethnicity distribution, race distribution, and minority status distribution)

Compliance 6.2. In addition, the Provider must report case status and the level of service provided at the time each case is closed as one of the following: advice, limited representation, or representation.[25]

Compliance 6.3. The legal assistance case type is reported for each closed case, and the Provider must determine and report the case type at the time each case is closed. The OAA legal assistance case type priorities are those required for Providers. Cases that do not fall into one of these nine priorities are reported in the "other/miscellaneous" category.
The OAA SPR case types differ from those identified by the Legal Services Corporation. A cross walk has been provided in the LSC Codes Cross Walk to Administration for Community Living (ACL) SPR Case Types Guide, which outlines how SPR case types align with LSC case types. The document is available in the Resources section on the Older Americans Act Performance System (OAAPS), which can be found after logging into the system. The Provider may also request the document by contacting the OAAPS Help Desk.

Standard 7: Client File

The program maintains a complete file for each client.

The Legal Assistance Provider must maintain a client file. A client file includes documentation of engagement by the client of the attorney; copies of all correspondence to the client, from the client and on behalf of the client; notes, summaries of telephone communications with and/or on behalf of the client; copies of documents filed on behalf of the client (e.g., request for a fair hearing, petition to the court with jurisdiction over the matter for which the client has engaged the attorney, etc.); any documents prepared by the attorney for the client; and any documents given to the attorney by the client for review.

[24] See Administration for Community Living Legal Assistance SPR Guidebook, attached herein as Attachment A.
[25] *Id.*

Standard 8: Program Records Maintained by the Provider

The program maintains appropriate staffing and the required records of services.

Compliance 8.1. The Legal Assistance Provider is required by Title 9 of the Official Compilation of Codes, Rules and Regulations of New York State ("NYCRR") to maintain records that are available to NYC Aging for review. 9 NYCRR §6654.8 directs each service provider to develop and implement procedures to obtain the views of program participants about the services they receive and to maintain copies of such records for at least five program years. The Provider is required to comply with this regulation and to make such records available to NYC Aging for inspection without disclosing the identity of the client. The Provider is required by state regulation to adopt procedures and forms to document that the legislative and administrative activities in which they engage fall within activities permitted by 9 NYCRR §6654.12(f).[26] Any costs claimed by the Provider associated with the contract must be supported by records of the covered activities for which reimbursement is sought.

Compliance 8.2. NYC Aging may review the adequacy of qualified staff which the Provider has assigned to provide services under the contract, staff training activities, location where services are provided, aggregate information about the clients served and the kinds of legal issues addressed (i.e., categories such as public benefits, financial or credit problems, surrogate decision making including guardianship defense, or housing including eviction and foreclosure) and documentation of ability to serve people with limited English proficiency or older adults with significant disabilities.

In addition, NYC Aging may require that the Provider record and report the following information for the period specified in the contract:

- the number of clients received via referral;
- the number of clients for whom intake has been completed;
- the number of older adults referred to other attorneys willing to provide *pro bono* services or services on a reduced fee basis or to the Legal Services Corporation and the reason for the referral;
- the number of matters resolved;
- the number of matters pending;
- a breakdown of the number of clients needing legal advice and the number needing representation either in an administrative or judicial proceeding;
- the average number of days between intake and resolution; and
- units of services claimed under the contract.

This is not an exhaustive list of the types of information and documentation that NYC Aging may use to administer its contracts with legal assistance providers that would not conflict with the attorney's duty of confidentiality.

Standard 9: NYC Aging General Program Standards of Operation

All Legal Assistance Providers must adhere to applicable requirements in the NYC Aging General Program Standards of Operation, which can be found on the Contractor Tools page of the NYC Aging website: https://www.nyc.gov/site/dfta/community-partners/contractor-tools.page

[26] See 9 NYCRR §6654.12(k)

SECTION 3. RESPONSIBILITIES OF THE LEGAL ASSISTANCE PROVIDER

The primary responsibility of the Legal Assistance Provider is to provide older New Yorkers who are in the greatest economic and social need with legal advice and representation, including representation in court. The Provider may represent individual older adult clients or groups of older adult clients. An example of group representation would be representation of a group of older adult tenants seeking relief from lease violations by their landlord. While other legal assistance activities, such as community legal education, are acceptable under these standards, the primary focus of the program is the direct legal representation of clients.

Relative to aging issues within the planning and service area, NYC Aging and the Provider shall provide leadership, including, but not limited to, planning, advocacy, coordination of services, interagency linkages, and information sharing in order to ensure that the Legal Assistance Program is an integral part of the services offered by NYC Aging.

Therefore, it is expected that the Provider will utilize the full range of legal advocacy tools in representing the interests of program clients. Specifically, the Provider should pursue judicial, administrative, and legislative remedies as appropriate, within the limits of applicable Federal and State Law.

Standard 10: General Provider Requirements[27]

Each Legal Assistance Provider shall adhere to the following:

Compliance 10.1. Maintain client confidentiality and otherwise abide by the Lawyer's Code of Professional Responsibility as adopted by the New York State Bar Association.

Compliance 10.2. Adhere to the standards set forth in this document and any amendments thereto.

Compliance 10.3. Work with NYC Aging to develop a method for surveying client satisfaction and ensure that the views of older persons are solicited and considered as to the operation of the program. Such methods shall respect the client's right to confidentiality. Report client satisfaction to NYC Aging annually.

Compliance 10.4. Assist NYSOFA and NYC Aging in developing and amending reporting instruments as necessary.

Compliance 10.5. Work with NYC Aging to assess and develop local program plans for reaching the target populations and addressing case priorities.

Compliance 10.6. Provide effective, high quality administrative and judicial representation in the priority issue areas for eligible individuals, unless it can be demonstrated that another provider within the Provider Service Area, i.e., catchment area, is delivering the service in accordance with these Standards.

Compliance 10.7. Maintain an office/outreach site in the catchment area served that allows staff and clients to meet privately and in person.

Compliance 10.8. Use Title III-B funds or other funds as contracted from NYC Aging to maintain or increase, to the extent practicable, the level of legal assistance furnished to eligible individuals, and shall not use Title III-B funds to supplant funds from other federal or non-federal sources.

Compliance 10.9. Not condition the provision of Title III-B funded legal assistance to any person 60 years of age or older based on their level of income or assets/resources. The Provider may only question the client about financial circumstances as a part of the process of providing legal advice, counsel and representation, and for the purpose of identifying additional resources to which the client may be entitled, and to assist in targeting clients with greatest social and economic need.

[27] 94-PI-52

Compliance 10.10. Not subcontract any interest or obligation arising under a Title III-B contract without the written approval of NYC Aging.

Compliance 10.11. Have the capacity to provide legal assistance, education and outreach in the principal language spoken by clients in areas where a significant number of clients do not speak English as their principal language.[28]

Compliance 10.12. Provide complete, accurate programmatic and fiscal reports to NYC Aging in a timely manner and provide additional information as may be requested by NYC Aging and the State Legal Assistance Developer,[29] while maintaining client confidentiality.

Compliance 10.13. In accordance with Standard 14 of the NYC Aging General Program Standards, give clients who received full representation and/or extensive services, as defined by the service provider, an opportunity to voluntarily contribute to the cost of the services they received. The Provider will ensure privacy with respect to the client, regardless of whether or not the client chooses to contribute. The method of informing the client of the opportunity to voluntarily contribute shall not discourage the utilization of services by the client.[30] The Provider will appropriately safeguard and use all collected contributions to expand the service for which the contributions were given and to supplement funds received under the OAA. On an annual basis, provide to NYC Aging a report of all voluntary contributions collected and spent.

Compliance 10.14. Establish goals for the future of the Legal Assistance Program in consultation with NYC Aging and the Legal Assistance Developer.

Standard 11: Assisted Referrals[31]

The program follows required procedures for referrals.

There will be times when an older adult asks a Legal Assistance Provider for help with a matter for which adequate and accessible legal resources already exist in the community. In such cases, the Provider may make a referral to an attorney in private practice.

Compliance 11.1. The Provider shall establish a legal referral mechanism. Referrals should be on a *pro bono* or reduced fee basis. If a client has a matter normally handled by the Legal Services Corporation ("LSC"), and the LSC is not the Provider for the catchment area, then the Provider, with the older adult client's permission, may make a referral to the LSC grantee. The client should be told, so long as it is true, that the LSC office handles more of that type of case and has a better expertise. The Provider should know whether this is in fact true because a cooperative relationship with the local LSC office should already have been established.

Compliance 11.2. In those instances where the Provider is an LSC grantee, that Provider must attempt, to the extent possible, to serve the older adult client with funds and personnel provided by LSC. The LSC grantee/Provider will be required to demonstrate a fair proportion of assistance to eligible older adult clients as a condition of receiving OAA funds from NYC Aging. This is in keeping with the objective of the OAA Legal Assistance Program supplementing legal assistance already available in NYC Aging's service area.

Compliance 11.3. The Provider must, if appropriate, make the first contact with the attorney or LSC office receiving the referral. The Provider must have procedures to follow up after the referral to assure that the client is served in a timely and adequate manner. This does not mean that the client always must be totally satisfied; the Provider is responsible only for assuring that what can be done for the client is being done. If not, the Provider must determine whether it is appropriate to

[28] See NYC Aging General Program Standards of Operation, Standard 9, Compliance 9.1 found at: https://www.nyc.gov/site/dfta/community-partners/contractor-tools.page

[29] 94-PI-52

[30] OAA § 315(b)(4); 45 CFR § 1321.9(c)(2)(x); 9 NYCRR §§ 6654.5

[31] *Id.*

take back the client and try to resolve the problem either through another, more effective referral, or through the OAA Legal Assistance Program.

Standard 12: Coordination with the Long-Term Care Ombudsman Program[32]

The program coordinates with the Long-Term Care Ombudsman Program.

Compliance 12.1. The State Long-Term Care Ombudsman Program is an advocacy program representing residents of long-term care facilities. Coordinating services between the Legal Assistance Program and the Ombudsman Program is deemed essential for the effective representation of a particularly vulnerable target population.

Compliance 12.2. While other means may be utilized, the best means of assuring the coordination of services is through the adoption of a memorandum of understanding. Such memorandum should be reviewed and renewed not less than once every four years. The Legal Assistance Provider must submit a copy of the memorandum of understanding to NYC Aging for its records upon execution and/or renewal.

Compliance 12.3. A memorandum of understanding adopted pursuant to this section should address, but not be limited to, issues of conflicts of interest, case acceptance procedures, and referral procedures. The memorandum should specify that clients of the Long-Term Care Ombudsman Program are entitled to advice and representation where otherwise eligible and appropriate under Legal Assistance Program priorities. In addition to the Lawyer's Code of Professional Responsibility, the Provider must maintain confidentiality in accordance with OAA and regulations, including, but not limited to, the sections on the Legal Assistance and Long-Term Care Ombudsman Programs.

[32] 94-PI-52

SECTION 4. JOINT RESPONSIBILITIES OF NYC AGING AND THE LEGAL ASSISTANCE PROVIDER

NYC Aging and the Legal Assistance Provider have a joint obligation to ensure that older New Yorkers within NYC Aging's planning and service area receive quality legal representation, while also maximizing limited financial resources. There are several ways in which this obligation may be met. In addition to the establishment of case priorities and assisted referrals discussed above, Standards 13 and 14 are intended to make the Legal Assistance Program more effective, both in terms of maximizing the limited funding available, and ensuring quality service is provided to clients.

Standard 13: Coordination with the Legal Services Corporation[33]

The program coordinates with the Legal Services Corporation.

Compliance 13.1. The LSC is a federally funded, non-profit corporation that receives funding based on the number of poverty-level individuals in each county. The OAA requires Legal Assistance Programs to coordinate its services with existing LSC projects.[34]

LSC grantees are mandated to serve the legal needs of individuals of all poverty levels in the county for which it receives a grant. These offices do not receive sufficient funds to represent every client who qualifies under the federal "poverty level" criteria. Nonetheless, each LSC grantee should represent a fair proportion of older adults since they receive funds based on the older adult population.

Compliance 13.2. NYC Aging and the Legal Assistance Provider shall find out the extent to which the local LSC grantee is representing older adult clients and, if necessary, advocate for increased representation of older adults at or below the federal poverty level. A close relationship shall be maintained among NYC Aging, the Legal Assistance Provider, and the LSC grantee.

Compliance 13.3. Where the local LSC grantee is also the Legal Assistance Provider, documentation of good faith efforts to represent older adults with LSC funds are required as a condition of contract continuance. LSC grantees receiving Legal Assistance Program funds must keep statistics on the age of the clients represented for review by NYC Aging.

Standard 14: Community Legal Education[35]

The program provides community legal education to educate and promote its services.

Compliance 14.1. The resources available under the OAA are extremely limited. Therefore, the primary focus of the Legal Assistance Program is the direct legal representation of clients. Nonetheless, the Legal Assistance Provider, in consultation with NYC Aging, must also serve the needs of older adults by engaging in community legal education so that clients and potential clients better understand their rights and how the Legal Assistance Program can assist them.

The Provider should recognize that community legal education can generate increased demand for services. Ideally, community legal education should be integrated into the Provider's service delivery scheme so as to complement the direct representation of older adults in priority areas. Examples of such integration are:

- Teaching older adults to take steps themselves to resolve matters.
- Advising older adults of a result achieved through direct representation, so that such result reaches those to whom

[33] 94-PI-52
[34] 42 U.S.C. § 3027(a)(11)(B); OAA § 307(a)(15)(B)
[35] 94-PI-52

it applies.

- Advising older adults that a specific problem, which traditionally may not be recognized as having a legal remedy, is amenable to a legal solution.
- Familiarizing older adults with the Legal Assistance Program and informing them of the availability of services.

Compliance 14.2. At any outreach event, the Provider must ensure that there is an opportunity for the participants to ask questions privately to an attorney or an intake worker.

Compliance 14.3. The Provider shall strive to allocate approximately 10% of legal assistance service units to community legal education and outreach.

Legal Assistance

State Performance Report (SPR) Guidebook

Version 1.2

May 2025

Introduction

The Legal Assistance SPR (LASPR) guidebook provides information on legal assistance data collection and reporting requirements for annual State Performance Reports (SPRs) and offers guidance on the production and submission of the report to the Administration for Community Living (ACL). This guidebook is intended for legal assistance providers (providers), Area Agencies on Aging (AAAs) and State Units on Aging (SUAs) involved in the reporting process under Title III-B of the Older Americans Act (OAA).

Legal assistance is defined as legal advice and representation provided by an attorney to older individuals with economic or social needs as defined in the Older Americans Act (Section 102(33)) and its implementing regulation at 45 CFR 1321.93. It includes to the extent feasible, counseling or other appropriate assistance by a paralegal or law student under the direct supervision of a lawyer and counseling or representation by a non-lawyer where permitted by law.

Legal assistance providers are required to report on an expanded list of data elements. These data allow ACL, providers, the AAAs that contract for their services, SUAs, and other interested parties to better understand the OAA-funded legal service advocacy provided to older Americans with economic or social need. Legal assistance providers submit data reports to AAAs and/or SUAs and SUAs upload legal assistance reports into the Older Americans Act Performance System (OAAPS). Providers do not have and do not need access to OAAPS.

This guidebook is composed of two sections. Section 1: "Data Collection and Report Information" highlights the SPR data elements that must be collected and reported by legal assistance providers, while Section 2: "Report Preparation and Submission" provides information on the reporting period, the required report format, and summary information on how AAAs and/or SUAs submit reports to ACL.

Section 1: Data Collection and Report Information

This section provides information on what data must be collected by legal assistance providers. Specifically, Section 1 contains definitions for cases, case status and case categories, as well as measures for the level of service provided.

This section may be of the most help to legal assistance provider staff, including intake or legal advocacy staff, and can help staff understand how to collect and categorize relevant data.

Case and Case Status Definitions

- **Case**: A case consists of one legal matter. Since a client may have more than one case during the reporting period, a legal assistance provider may report more cases than clients served.

- **Open Case**: 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.

- **Total Number of Open Cases**: The reporting period for cases is the federal fiscal year (FFY), ranging from October 1 to September 30. For example, October 1, 2023 is the start of FFY 2024, which ends on September 30, 2024. The total number of open cases is as of the last day of the reporting period, September 30. If a case is opened during one reporting period and that period concludes while the case is still ongoing, the case should be reported as one case and not two separate cases.

- **Closed Case**: A case is closed when the legal assistance provider has completed their work within the scope of representation, resolved the client's legal issue, or determined they are unable to assist after conducting some work.

    - Cases may also be closed after a reasonable period if the legal assistance provider cannot contact the client, despite the provider's efforts to make contact.

    - A case should be closed, and a new case opened when the venue, jurisdiction or level of representation changes. The provider would then count two cases for this client – first the initial brief service and second the more intensive representation. For example, if a client consults with a provider about Medicaid eligibility, the client later applies and is declared ineligible, and that same provider later assists that client in contesting that finding, that would constitute two separate cases.

- **Total Number of Closed Cases**: The total number of closed cases is as of the last day of the FFY, September 30th.

Client Demographics and Characteristics

- **Total Unduplicated Persons Served**: This count consists of an unduplicated count of the total number of clients who received at least one service during the reporting period. A client should only be included in this count once, even if they have had multiple cases handled by the legal assistance provider during the reporting period.

  Additionally, demographic information for the total number of clients who received a legal assistance service is reported as follows:

- **Age Distribution**: The eligible client population is usually age 60 and older. Age of clients is reported in the following age cohorts:
  - Below 60
  - 60-64
  - 65-74
  - 75-84
  - 85 and above
  - Age missing

  If a client declines to disclose data on age or that information is not available, then record age as "Age missing."

- **Sex Distribution**: Sex is reported in the following categories:
  - Female
  - Male
  - Sex missing

  If a client declines to disclose data on sex or that information is not available, then record sex as "Sex missing."

- **Ethnicity Distribution**: Ethnicity is reported consistent with how the client wishes to be identified in the following categories:
  - Hispanic or Latino
  - Not Hispanic or Latino
  - Ethnicity missing

  If a client declines to disclose data on ethnicity or that information is not available, then record ethnicity as "Ethnicity missing."

- **Poverty Status**: The following poverty status categories are reported, according to the federal poverty line (see the ASPE Poverty Guidelines web page):
  - At or below the federal poverty line
  - Above poverty
  - Poverty status missing

  If a client declines to disclose data on poverty status or that information is not available, then record poverty status as "Poverty status missing."

- **Household Status**: Household status is reported in the following categories:
  - Lives alone
  - Lives with others
  - Lives in a long-term care facility
  - Household status missing

  If a client declines to disclose data on household status or that information is not available, then record household status as "Household status missing."

- **Geographic Distribution**: This category is intended to capture the geographic characteristics of the place where a client lives, with a client's zip code defined as rural or non-rural according to Rural Urban Commuting Area (RUCA). Learn more about RUCA codes at the USDA RUCA web page.
  - Rural
  - Non-rural
  - Geographic distribution missing

  If a client declines to disclose data on where the client lives or that information is not available, then record geographic distribution as "Geographic distribution missing."

- **Race Distribution**: Race is reported consistent with how the client wishes to be identified in the following 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.

- **Minority Status Distribution**: Minority status is reported consistent with how the client wishes to be identified in the following categories:
  - Minority
  - Not minority
  - Minority status missing

  If a client declines to disclose data on minority status or that information is not available, then record minority status as "Minority status missing."

- **Age Distribution by Poverty Status**: Age of clients who are at or below the federal poverty line is reported in the following age cohorts:
  - Below 60 and at or below the federal poverty line
  - 60-64 and at or below the federal poverty line
  - 65-74 and at or below the federal poverty line
  - 75-84 and at or below the federal poverty line
  - 85 and above and at or below the federal poverty line
  - Age missing and at or below the federal poverty line

  If a client declines to disclose data on age or that information is not available, then record age distribution as "Age missing and at or below the federal poverty line."

- **Sex Distribution by Poverty Status**: Sex is reported in the following categories for client living at or below the federal poverty line:
  - Female and at or below the federal poverty line
  - Male and at or below the federal poverty line
  - Sex missing and at or below the federal poverty line

  If a client declines to disclose data on sex or that information is not available, then record sex distribution as "Sex missing and at or below the federal poverty line."

- **Ethnicity Distribution by Poverty Status**: Ethnicity is reported consistent with how the client who is at or below the federal poverty line wishes to be identified in the following categories:
  - Hispanic or Latino and at or below the federal poverty line
  - Not Hispanic or Latino and at or below the federal poverty line
  - Ethnicity missing and at or below the federal poverty line

  If a client declines to disclose data on ethnicity or that information is not available, then record ethnicity distribution as "Ethnicity missing and at or below the federal poverty line."

- **Household Status Distribution by Poverty Status**: Household status is reported for clients at or below the poverty line in the following categories:
  - Lives alone and at or below the poverty
  - Lives with others and at or below the poverty Lives in a long-term care facility and at or below the poverty line
  - Household status missing and at or below the poverty

  If a client declines to disclose data on household status or that information is not available, then record household status distribution as "Household status missing and at or below the federal poverty line."

- **Race Distribution by Poverty Status**: Race is reported consistent with how the client at or below the federal poverty line wishes to be identified in the following categories:
    - American Indian or Alaska Native and at or below the federal poverty line
    - Asian or Asian American and at or below the federal poverty line
    - Black or African American and at or below the federal poverty line
    - Native Hawaiian or Pacific Islander and at or below the federal poverty line
    - White and at or below the federal poverty line
    - Persons reporting some other race and at or below the federal poverty line
    - Persons reporting 2 or more races and at or below the federal poverty line (unduplicated count)
    - Race missing and at or below the federal poverty line

    The unduplicated number of people that selected two or more race options and who are at or below the federal poverty line should be reported in the option titled "Persons reporting 2 or more races and at or below the federal poverty line (unduplicated count)." For example, if a client selects both "Asian" and "Other" for race, they should be reported as: Asian or Asian American and at or below the federal poverty line: 1; Persons reporting some other race and at or below the federal poverty line: 1; Persons reporting 2 or more races and at or below the federal poverty line (unduplicated count): 1.

- **Minority Status Distribution by Poverty Status**: Minority status is reported consistent with how the client at or below the federal poverty line wishes to be identified in the following categories:
    - Minority and at or below the federal poverty line
    - Not minority and at or below the federal poverty line
    - Minority status missing and at or below the federal poverty line

    If a client declines to disclose data on minority status or that information is not available, then record minority status distribution as "Minority status missing and at or below the federal poverty line."

Levels of Service

Legal assistance is measured at three levels of services: advice, limited representation, and representation. Legal assistance providers must report the level of service provided at the time each case is closed at one of the three following levels:

- **Advice**
  - Advice cases involve an evaluation of a client's situation, such as is typically done at intake, and includes counseling and/or providing information or guidance about legal circumstances.
  - This may include referrals or presenting options for responding to the circumstances presented by the client when additional legal assistance will not be provided. For example, referring a client to a different lawyer or informing a client on whether housing court is the appropriate venue for their claims.

- **Limited Representation**
  - In limited representation cases, more extensive intervention than advice is provided, such as document preparation or detailed instruction on how to take legal action pro se. Legal assistance services delivered at self-help clinics or court-based advice, or "pop-up" programs could fall under advice or limited representation, depending upon the intensity of effort and time expended.
  - Legal assistance program policies and procedures generally address whether the services provided constitute limited representation.

- **Representation**
  - Representation cases involve full-service legal intervention, including
  - representation in an administrative forum or in a court of law, negotiation to settle a dispute, and settlements with administrative agencies and in judicial fora.

Service Units

The legal assistance service unit is reported in hours. Partial hours may be reported up to two decimal cases (for example, 15 minutes is reported as 0.25 hours). Legal assistance providers are required to report the aggregate number of service units provided to all clients in all cases during the reporting period.

Case Types (Closed Cases)

Legal assistance case type is reported for each closed case and legal assistance providers must determine and report the case type at the time each case is closed. The Older Americans Act legal assistance case type priorities are those required for providers. Cases that do not fall into one of these nine priorities are reported in the "other/miscellaneous" category.

The Older Americans Act SPR case types differ from those identified by the Legal Services Corporation. A cross walk has been provided in the **LSC Codes Cross Walk to ACL SPR Case Types Guide**, which outlines how SPR case types align with LSC case types. The document 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 ACL resources with any of their contracted legal service providers. Legal assistance providers may also request the document by contacting the OAAPS Help Desk.

Note: The examples provided below are not exhaustive, and technical assistance is available to respond to legal assistance providers' questions about case types.

- **Income**
  - SSI and Social Security eligibility, termination, reduction, overpayments
  - Pension disputes
  - Unemployment insurance eligibility, termination or reduction
  - State and local income maintenance programs, including eligibility, terminations, and reductions, including state supplements to SSI and state-specific programs.
  - Income – Other

- **Health Care**
  - Medicaid and Medicare eligibility, termination, and reduction
  - Medicare Savings Programs (Qualified Medicare Beneficiary, Specified Low-Income Medicare Beneficiary, Qualifying Individual) eligibility, reduction, and termination
  - Medicaid waiver home and community services eligibility, and Medicaid termination
  - Veterans Administration benefits disputes
  - Medigap disputes
  - Retiree health eligibility and/or benefits disputes
  - Private insurance disputes
  - Health – Other

- **Long-Term Care**
  - Nursing home admission, discharge, room change, visitor access, refusal of facility to re-admit a resident after a hospitalization or other leave of absence, and other residents' rights
  - Support for transitions from a nursing home to a community setting, or diversion from a nursing home to a community setting
  - Home and Community Based Services - level of care eligibility disputes, and/or amount, category and/or duration of benefits, reductions and terminations of such benefits
  - Long Term Care – Other

Note: This case type describes the type of legal case presented by a client and not the setting in which the client resides, which is reported in Client Demographics and Characteristics.

Note: Medicaid eligibility for home and community-based services is to be recorded as a Health Care case.

- **Nutrition**
  - SNAP eligibility, benefits, reduction, or termination.
  - Nutrition – Other

- **Housing**
  - Landlord/tenant
    - Eviction
    - Warranty of habitability
    - Mobile home tenant issues
  - Real property
    - Foreclosure
    - Real property-related predatory lending claims
    - Mortgage issues
    - Title issues
  - Housing – Other

- **Utilities**
  - Utilities shutoffs
  - Utilities billing disputes
  - Utilities deposit disputes
  - Utility diversion disputes
  - Utilities reasonable accommodation matters
  - Utilities – Other

- **Abuse/Neglect**
  - Orders of protection and associated matters
  - Recovery of assets lost due to financial exploitation or abuse
  - Actions to assert rights and remedies of elders in cases of abuse, financial exploitation, or neglect, including protective orders and safety plans
  - Abuse/Neglect – Other

- **Defense of Guardianship or Protective Services**
  - Representation to oppose imposition of guardianship
  - Revocation of guardianship or limiting the terms or extent of guardianship
  - Restoration of rights
  - Alternatives to guardianship
  - Preparation of legal documents that preserve self- determination and decisional rights, such as a Power of Attorney, or other formal or informal support to preserve the decisional rights of an elder client

- Powers of Attorney
- Living Wills
- Health Care Proxies
- Supported Decision-Making Contracts

  - Defense of Guardianship and Protective Services – Other

- **Age Discrimination**
  - Employment or other age-related discrimination, based upon inclusion in a protected class of age
  - Housing discrimination claims based upon inclusion in a protected class of age
  - Other claims of discrimination based upon inclusion on the protected class of age

- **Other/Miscellaneous**
  - The other/miscellaneous includes cases that do not fall into any other SPR case type, including, but not limited to:
  - Medical and other debt collection, including repossession, bank account or wage garnishment, etc.
  - Fair Debt Collection Practices Act claims
  - Predatory lending (housing and non-housing-related)
  - Unfair and deceptive sales or marketing claims
  - Disputes over loans
  - Bankruptcy
  - Other consumer matters
  - Asserting the rights and supporting the legal authority of grandparents raising grandchildren
  - Disability rights (e.g., 504 or ADA claims)
  - Other

Section 2: State Performance Report (SPR) Preparation and Submission

This section describes how data are collected by legal assistance providers and how these data are reported to ACL. This section also provides information to assist providers in producing reports, including information on categorizing data for their reporting based on SPR data elements and on submitting reports.

This section also describes the SPR reporting period and provides information on how data should be aggregated and formatted for submission to ACL, including information on the requirement to report de-identified and aggregated data in a way that preserves client confidentiality.

The information in this section is intended to assist legal assistance providers, including legal staff, managers, and personnel who manage data, with reporting, to ensure the appropriate SPR data elements are reported in the required format. For additional information about the SPR data elements, see Appendix A: List of Data Elements.

This section also provides information on the Legal Assistance State Performance Report Tool (LAPST) that legal assistance providers may use to extract the needed data from their case management systems and to deidentify, aggregate and format the data into a report ready for submission.

Reporting Period

The reporting period for cases is the federal fiscal year (FFY), ranging from October 1 to September 30 (for example, October 1, 2023 is the start of FFY 2024, which ends on September 30, 2024).

Legal assistance providers collect SPR data on OAA-funded legal assistance. These data are reported annually in an aggregated and deidentified format. Providers submit their reports to their State Unit on Aging (SUA), which uploads the legal assistance report to the Administration for Community Living (ACL) via the Older Americans Act Performance System (OAAPS).

Key SPR dates:

- **October 1**: First day of each annual SPR collection and reporting period
- **September 30**: Closing date of each annual SPR collection and reporting period
- **January 31**: Date by which states must submit SPR data for the preceding FFY to ACL via OAAPS (for example, January 31, 2024 is the date by which states must submit SPR data for FFY 2023)

Data Format, Reporting, and Submission

Legal assistance providers must produce a report containing aggregated and deidentified data for each of the required SPR data elements for the reporting period (the FFY). These data must be deidentified and aggregated to ensure no disclosure of personally identifiable client information. Any such disclosures would violate applicable rules of professional conduct for lawyers and non-lawyers working under the supervision of lawyers.

Legal assistance is the only restricted service. Accordingly, all legal assistance data is reported separately from other service data and is aggregated and deidentified, ensuring there is no risk to client confidentiality. A restricted service is a service provided using Older Americans Act funds in whole or in part for which demographic and consumer characteristics are reported in aggregate, and personal identifying information (PII) related to clients is not shared or recorded beyond the provider level.

Legal assistance providers do not submit data directly into OAAPS, but instead convey their deidentified, aggregated, and formatted data report to State Units on Aging, which in turn upload legal assistance data reports into OAAPS.

OAAPS-compatible report templates are available on the password-protected OAAPS website that is available to SUAs and AAAs, but not to individual legal assistance providers.

Legal Assistance Provider SPR Tool (LAPST)

ACL has created a Microsoft Excel tool, the Legal Assistance Provider SPR Tool (LAPST), that may help providers in preparing SPR data reports in a format fully compatible with OAAPS. The tool helps to assure that legal assistance data are deidentified, aggregated, and organized into the required data fields, and formatted properly for direct upload by SUAs into OAAPS. Legal assistance providers using LAPST may use raw, case-level data from their case management systems or may enter already deidentified and aggregated data. After the data are entered into LAPST, the tool will convert the data into an OAAPS-compatible report for submission to SUAs. Legal assistance providers may request the LAPST by contacting the OAAPS Help Desk.

Additional Resources and Technical Assistance

This guidebook is intended as a general reference for information about ACL's legal assistance SPR data collection and reporting requirements. AAAs and SUAs have access to OAAPS and can access more information there. SUAs can also upload data reports through the OAAPS portal.

For those without access to OAAPS and who are interested in learning more about SPR reporting, resources are available at the National Center on Law and Elder Rights. Technical assistance related to legal assistance SPR is also available via the OAAPS Help Desk.

Appendix A: List of Data Elements

ACL Ref #	Data Element
LA-01	Number of Open Cases
LA-02	Number of Closed Cases
Closed Cases:	
LA-03	Level of Service: Advice
LA-04	Level of Service: Limited Representation
LA-05	Level of Service: Representation
LA-06	Case Type: Income
LA-07	Case Type: Health Care
LA-08	Case Type: Long-Term Care
LA-09	Case Type: Nutrition
LA-10	Case Type: Housing
LA-11	Case Type: Utilities
LA-12	Case Type: Abuse/Neglect
LA-13	Case Type: Defense of Guardianship or Protective Services
LA-14	Case Type: Age Discrimination
LA-15	Case Type: Other/Miscellaneous
All Cases:	
CD-01-LA	Total Persons Served
CD-02-01-LA	Age: Below 60
CD-02-02-LA	Age: 60-64
CD-02-03-LA	Age: 65-74
CD-02-04-LA	Age: 75-84
CD-02-05-LA	Age: 85+

ACL Ref #	Data Element
CD-02-06-LA	Age: Missing
CD-03-01-LA	Sex: Female
CD-03-02-LA	Sex: Male
CD-03-04-LA	Sex: Missing
CD-04-01-LA	Geographic Distribution: Rural
CD-04-02-LA	Geographic Distribution: Non-Rural
CD-04-03-LA	Geographic Distribution: Missing
CD-05-01-LA	Poverty Status: At or below poverty
CD-05-02-LA	Poverty Status: Above Poverty
CD-05-03-LA	Poverty Status: Missing
CD-06-01-LA	Household Status: Lives Alone
CD-06-02-LA	Household Status: Lives with Others
CD-06-03-LA	Household Status: Lives in Long-Term Care (LTC) Facility
CD-06-04-LA	Household Status: Missing
CD-07-01-LA	Ethnicity: Hispanic or Latino
CD-07-02-LA	Ethnicity: Not Hispanic or Latino
CD-07-03-LA	Ethnicity: Missing
	*Race is a duplicated count. Multi-racial persons counted for each racial identity
CD-08-01-LA	Race: American Indian or Alaska Native
CD-08-02-LA	Race: Asian or Asian American
CD-08-03-LA	Race: Black or African American
CD-08-04-LA	Race: Native Hawaiian or Pacific Islander

ACL Ref #	Data Element
CD-08-05-LA	Race: White
CD-08-06-LA	Race: Missing
CD-08-07-LA	Race: Persons reporting some other race
CD-08-08-LA	Race: Persons reporting 2 or more races (unduplicated count)
CD-09-01-LA	Minority Status: Minority
CD-09-02-LA	Minority Status: Not Minority
CD-09-03-LA	Minority Status: Missing
CD-13-01-LA	Age and Poverty Status: Below 60 and at or below poverty
CD-13-02-LA	Age and Poverty Status: 60-64 and at or below poverty
CD-13-03-LA	Age and Poverty Status: 65-74 and at or below poverty
CD-13-04-LA	Age and Poverty Status: 75-84 and at or below poverty
CD-13-05-LA	Age and Poverty Status: 85+ and at or below poverty
CD-13-06-LA	Age and Poverty Status: Age Missing and at or below poverty
CD-14-01-LA	Sex and Poverty Status: Female and at or below poverty
CD-14-02-LA	Sex and Poverty Status: Male and at or below poverty
CD-14-04-LA	Sex and Poverty Status: Missing and at or below poverty
CD-15-01-LA	Geographic Distribution and Poverty Status: Rural and at or below poverty
CD-15-02-LA	Geographic Distribution and Poverty Status: Non-Rural and at or below poverty
CD-15-03-LA	Geographic Distribution and Poverty Status: Missing and at or below poverty
CD-16-01-LA	Household Status and Poverty Status: Lives Alone and at or below poverty
CD-16-02-LA	Household Status and Poverty Status: Lives with Others and at or below poverty

ACL Ref #	Data Element
CD-16-03-LA	Household Status and Poverty Status: Lives in Long-Term Care (LTC) Facility and at or below poverty
CD-16-04-LA	Household Status and Poverty Status: Missing and at or below poverty
CD-17-01-LA	Ethnicity and Poverty Status: Hispanic or Latino and at or below poverty
CD-17-02-LA	Ethnicity and Poverty Status: Not Hispanic or Latino and at or below poverty
CD-17-03-LA	Ethnicity and Poverty Status: Missing and at or below poverty
	*Race is a duplicated count. Multi-racial persons counted for each racial identity
CD-18-01-LA	Race and Poverty Status: American Indian or Alaska Native and at or below poverty
CD-18-02-LA	Race and Poverty Status: Asian or Asian American and at or below poverty
CD-18-03-LA	Race and Poverty Status: Black or African American and at or below poverty
CD-18-04-LA	Race and Poverty Status: Native Hawaiian or Pacific Islander and at or below poverty
CD-18-05-LA	Race and Poverty Status: White and at or below poverty
CD-18-06-LA	Race and Poverty Status: Missing and at or below poverty
CD-18-07-LA	Race and Poverty Status: Persons reporting some other race and at or below poverty
CD-18-08-LA	Race and Poverty Status: Persons reporting 2 or more races (unduplicated count) and at or below poverty
CD-19-01-LA	Minority Status and Poverty Status: Minority and at or below poverty
CD-19-02-LA	Minority Status and Poverty Status: Not Minority and at or below poverty
CD-19-03-LA	Minority Status and Poverty Status: Missing and at or below poverty
SU-01-OA-LA	Service Units

Appendix B: OAAPS-Compatible Report Example

1	Component	ACL Ref #	Resource	Field	Value	Section Name
12	TitleIIILegalChars	CD-04-01-LA	api/titleiii/assistedtransportationchars	TotalRural	0	Older Adults > Legal Assistance > Consumer Characteristics
13	TitleIIILegalChars	CD-04-02-LA	api/titleiii/assistedtransportationchars	TotalNonRural	0	Older Adults > Legal Assistance > Consumer Characteristics
14	TitleIIILegalChars	CD-04-03-LA	api/titleiii/assistedtransportationchars	TotalGeoMissing	0	Older Adults > Legal Assistance > Consumer Characteristics
15	TitleIIILegalChars	CD-05-01-LA	api/titleiii/assistedtransportationchars	TotalBelowPoverty	0	Older Adults > Legal Assistance > Consumer Characteristics
16	TitleIIILegalChars	CD-05-02-LA	api/titleiii/assistedtransportationchars	TotalAbovePoverty	0	Older Adults > Legal Assistance > Consumer Characteristics
17	TitleIIILegalChars	CD-05-03-LA	api/titleiii/assistedtransportationchars	TotalMissingPoverty	0	Older Adults > Legal Assistance > Consumer Characteristics
18	TitleIIILegalChars	CD-06-01-LA	api/titleiii/assistedtransportationchars	TotalAlone	0	Older Adults > Legal Assistance > Consumer Characteristics
19	TitleIIILegalChars	CD-06-02-LA	api/titleiii/assistedtransportationchars	TotalWithOthers	0	Older Adults > Legal Assistance > Consumer Characteristics
20	TitleIIILegalChars	CD-06-03-LA	api/titleiii/assistedtransportationchars	TotalLongTermCareFacility	0	Older Adults > Legal Assistance > Consumer Characteristics
21	TitleIIILegalChars	CD-06-04-LA	api/titleiii/assistedtransportationchars	TotalHouseholdMissing	0	Older Adults > Legal Assistance > Consumer Characteristics
22	TitleIIILegalChars	CD-07-01-LA	api/titleiii/assistedtransportationchars	TotalHispanic	0	Older Adults > Legal Assistance > Consumer Characteristics
23	TitleIIILegalChars	CD-07-02-LA	api/titleiii/assistedtransportationchars	TotalNonHispanic	0	Older Adults > Legal Assistance > Consumer Characteristics
24	TitleIIILegalChars	CD-07-03-LA	api/titleiii/assistedtransportationchars	TotalEthnicityMissing	0	Older Adults > Legal Assistance > Consumer Characteristics

Version Control

Version	Date published	Changes from previous version
1.0	11/01/2023	Original version
1.1	11/13/2024	Updated resources, definitions, and client demographic and characteristics to reflect updates in the LAPST (version 5.0)
1.2	05/01/2025	Updated terminology