



INFORMATION MEMORANDUM

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TO: Subrecipients of the State Unit on Aging

FROM: Cynthia Brammeier, Administrator, State Unit on Aging

BY: Amy Hochstetler, Information Technology Business Analyst, State Unit on Aging
Doug Bauch, Program Manager, State Unit on Aging
Ben Strongberg, Program Coordinator, State Unit on Aging
Erik White, Program Coordinator, State Unit on Aging

SUBJECT: Participant Data Collection when Demographic Information is Not Required

CONTENT: This Information Memorandum provides best practices on collecting participant data for services that do not require a demographic intake. This guidance applies to Non-Registered Services and Sign-In Services that involve counting participants. These services will be referred to as Non-Intake Services for brevity. Services may include, but are not limited to:

- Nutrition Education (Estimated audience size)
- Social Activities (Number of persons to calculate Person Hours)
- Health Promotion/Disease Prevention (Evidence Based) (Estimated unduplicated client count)
- Health Promotion/Disease Prevention (Non-Evidence Based) (Estimated unduplicated client count)

Each service requires an approximate or specific number of participants to be reported. This guidance highlights best practices to document participants, and confirm they meet program eligibility requirements.

The Area Agency on Aging determines the policy for providers to follow.

This Information Memorandum does not apply to Registered Services.

This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.

1. **The participant has a demographic intake form on file for a Registered Service (such as Congregate or Home Delivered Meals).**
 - a. The participant's intake form will contain information such as: name, birthdate, and zip code. The provider can look up this information if needed.
 - b. A participant's name is usually unique. It can be used to identify a participant.
 - c. A birthdate is used to determine eligibility for aging services. It does not change. It does not need to be collected at the time of each service if it is already on file.
 - d. A zip code is used to help identify the difference between people with the same name. It may change, but can be updated when the participant's intake is updated. It does not need to be collected at the time of each service if it is already on file.

Practical application if a participant's intake form is on file:

- a. The participant's eligibility does not need to be documented for each service.
- b. The participant's birthdate, birthday, or birth year do not need to be collected for each service.
- c. The participant's zip code does not need to be reported for each service.

The Area Agency on Aging can require more data to be collected.

2. **The participant does not have a demographic intake form on file for another service.**

The provider must follow data collection requirements each time a service is offered.

Practical application if a participant's intake form is not on file:

The client's eligibility must be determined for each service. Data collection requirements are outlined in the Program Reference Guide and may vary from service to service.

The Area Agency on Aging can require more data to be collected.

3. When does the provider need to collect a signature, hand-written name, initials, or personal mark?

If the provider uses pre-printed attendance sheets, a signature, hand-written name, initials, or personal mark should be collected. This validates participation and allows attendance sheets to be audited.

Collecting a signature or hand-written name is considered best business practice. Initials are acceptable to collect, but may be more difficult to audit. A personal mark can be collected if the participant is unable to provide a signature, hand-written name, or initials.

If the Non-Intake Service occurs during a Registered Service, separate procedures do not need to take place. The Non-Intake Service can follow the Registered Services policy.

The Area Agency on Aging determines the policy for providers to follow.

Practical application of validating participants:

- A Nutrition Education session event occurs during a Congregate Meal or Home Delivered Meal.
 - The provider documents that the service occurred during the meal.
 - Participants are validated through the Congregate Meal or Home Delivered meal policy.

- A provider pre-prints a daily list of regular participants.
 - Each service has its own column – including Non-Intake Services.
 - A staff member, a volunteer, or the participant checks the activities they participated in.
 - The participant signs off during the last activity or before they leave (signature, hand-written name, initials, or personal mark).

The Area Agency on Aging determines the policy for providers to follow. The Area Agency on Aging can require a separate form or more documentation at its discretion.

4. The provider uses bar code scanning technology or other software to validate participants and track services.

Bar code scanning technology can quickly check in participants and track their services. In order to use bar code scanning, the provider must be able to:

- a. Clearly report the individual participants served.
- b. Connect each participant to the required information (such as eligibility, birth year, or zip code).

If the provider can supply the two requirements, manual sign-in sheets and other paper forms of tracking are not required.

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Practical application of bar code scanning as participant validation:

- When a participant completes a demographic intake form, the senior center issues a key tag to the participant.
 - When the participant goes to the senior center, the participant scans their key tag and selects the services they will participate in.
 - The participant does not need to complete a sign-in sheet or other paper form.
 - The participant should verify before they leave, that their planned services match the actual service.
- When a participant completes a demographic intake form, the senior center issues a key tag to the participant.
 - A senior center staff member or volunteer may come around during an activity to scan participant key tags.

The Area Agency on Aging determines the policy for providers to follow.

If you have questions, please contact Amy Hochstetler, Ben Stromberg, Erik White, or Doug Bauch at (402) 471-2307 or at DHHS.aging@nebraska.gov.