

# —TECHNICAL ASSISTANCE MEMORANDUM—

## Texas Department of Aging and Disability Services (DADS) – Access and Intake Division

<b>TITLE:</b>	Low, Moderate, and High Incomes	<b>NUMBER:</b>	AAA- TA 303
<b>SECTION:</b>	Area Agencies on Aging	<b>APPROVAL:</b>	Betty Ford
<b>ISSUE DATE:</b>	9/23/09	<b>REVISION DATE:</b>	10/30/09
<b>RELEVANT CITATIONS:</b>	45 CFR §1321 & §1321.67; Reporting Requirement for Title III & VII- State Program Report Definitions Section; AAA-TA 301		
<b>DISTRIBUTION:</b>	<input type="checkbox"/> Executive Director <input checked="" type="checkbox"/> Director <input checked="" type="checkbox"/> Fiscal Director <input checked="" type="checkbox"/> AAA Section Staff		

The Department is revising the technical assistance memorandum (TA) to clarify the National Aging Program Information Systems (NAPIS) requirements related to incomes.

NAPIS requires the number of individuals with “income below poverty level” for Cluster 1 services (Personal Assistance, Homemaker, Chore Maintenance, Home Delivered Meals, Adult Day Service, and Care Coordination). The State Program Report Definitions section of the Reporting Requirement for Title III and VII defines poverty as income below the official poverty guideline. The current Health and Human Services Poverty Guidelines are provided in AAA-TA 301 – Poverty Guidelines and can be located on the Administration on Aging website at [http://www.aoa.gov/AoARoot/AoA\\_Programs/OAA/Aging\\_Network/poverty\\_guidelines/Poverty\\_Guidelines.aspx](http://www.aoa.gov/AoARoot/AoA_Programs/OAA/Aging_Network/poverty_guidelines/Poverty_Guidelines.aspx).

According to 45 CFR §1321, the AAAs and their service providers are required to set moderate and high income levels to assist them in setting sliding scales for supporting client contributions. In 45 CFR §1321.67 Service Contributions, it states each service provider under the Older Americans Act (OAA) may develop a suggested contribution schedule for services provided. In developing a contribution schedule, the service provider will consider the income ranges of older individuals in the community and the provider’s other sources of income. **At all times, it must be remembered that means tests may not be used for any service supported by OAA funding.**

The value of collecting income levels is to assist AAAs, when determining service delivery priority populations (or even potential denial of services, or placing a person on an interest list), while considering factors related to targeting services as a whole. The Client Intake Workgroup determined it was necessary to keep “moderate” and “high” income levels as a required element of the Client Intake form. Those areas are in bold font on the form, indicating a required data element. In the Workgroup’s opinion, to support outreach methods and to prioritize service provision, moderate and high income levels are needed when determining populations to be served.