

## Multnomah County Aging and Disability Services Division

## Older Americans Act Policy on Individual Contributions, Membership Dues and Participant Fees for District Senior Center Activities and Services

## Q & A

**1. Question**: What are the eligibility requirements for participation in Older Americans Act (OAA) funded services?

**Answer**: OAA services are for any older adult 60 years of age and better. No one over age 60 can be denied services from OAA programs. All older adults age 60 years of age and older will have equal access to OAA funded activities and services in the senior center without regard to economic or social status, race, color, religion, gender, sexual orientation, gender identity or expression, national origin, language spoken, disability, or other aspects of what we look like or where we come from.

**2. Question**: How much funding do senior centers receive from the OAA?

Answer: Approximately 17% of senior center funding allocated by Aging and Disability Services Division (ADS) is for OAA services and which reimburses senior centers for case management, evidence-based health promotion and family caregiver support services. Approximately 26% of senior center funding comes from the City of Portland Parks and Recreation and which reimburses senior centers for recreation, information and assistance, case management and transportation services. Oregon Project Independence pays for case management and options counseling at approximately 13% of senior center funds. County general funds are 40% of senior center funding and pay for case management, options counseling, information and assistance, and network facilitation; and Title XIX Medicaid is approximately 4% that pays for information and assistance.

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**3. Question**: Is a senior center permitted to request voluntary contributions from individuals for any of the OAA services offered in its center?

**Answer**: Yes. Voluntary contributions shall be allowed and may be solicited for all services for which funds are received under the OAA if the method of solicitation is non-coercive. Such contributions shall be encouraged for individuals whose self-declared income is at or above 185% of the poverty line, at contribution levels based on the actual cost of services.<sup>i</sup>

For services rendered with funding under the Older Americans Act the area agency on aging shall assure that each senior center shall:

- Provide each recipient with an opportunity to voluntarily contribute to the cost of the service;
- Clearly inform each recipient that there is no obligation to contribute and that the contribution is purely voluntary;
- Protect the privacy of each recipient with respect to his or her contribution or lack of contribution;
- Establish appropriate procedures to safeguard and account for all contributions;
- Use all collected contributions to expand the service for which the contributions were given and to supplement (not supplant) funds received under this Act, ii and
- Each service provider shall use supportive services and nutrition services contributions to expand supportive services and nutrition services respectively.<sup>iii</sup>

The area agency on aging and service providers shall not means test for any service for which contributions are accepted or deny services to any individual who does not contribute to the cost of the service. A service provider that receives funds may not deny any older person a service because the older person will not or cannot contribute to the cost of the service. iv

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i  $\,$  Older Americans Act, Section 315 (b) Voluntary Contributions (1) In General

ii Older Americans Act, Section 315 (b) Voluntary Contributions (4) Required Acts

iii In Multnomah County supportive services that are funded by the OAA and offered in ADS district senior centers include case management, evidence-based health promotion and family caregiver support. No OAA funds are used for senior center recreation.

iv Older Americans Act, Section, Section 315 (b) Voluntary Contributions (3) Prohibited Acts

**4. Question**: Is a senior center permitted to charge fees for activities and services that are funded with OAA dollars?

**Answer**: A State is permitted to implement cost sharing for all services funded by the OAA by recipients of the services except for the following services:

- Information and assistance, outreach, benefits counseling and case management services.
- Ombudsman, elder abuse prevention, legal assistance, or other consumer protection services.
- Congregate and home delivered meals.
- Any services delivered through tribal organizations.

A State shall not permit cost sharing by a low-income older individual if the income of such individual is at or below the Federal poverty line. vi

**5. Question**: Is a senior center allowed to charge annual dues for senior center membership or participant fees for senior center activities?

**Answer**: Yes. A senior center may charge membership dues and participant fees to help defray the cost to offer senior center activities and services; however, no one over age 60 can be denied services from OAA funded programs.

The area agency on aging and service providers shall not means test for any service for which contributions are accepted or deny services to any individual who does not contribute to the cost of the service. A service provider that receives funds may not deny any older person a service because the older person will not or cannot contribute to the cost of the service.

**6. Question**: How does a senior center implement voluntary contributions, membership dues and participant fees?

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v Ibid

vi Older Americans Act, Section 315 (a) Cost Sharing (3) Prohibitions

vii Currently the State of Oregon does not permit cost sharing with OAA funds but is working on a policy to allow cost sharing.

**Answer**: The senior center shall have a written policy for requesting voluntary contributions, membership dues and participant fees, for both OAA funded activities and non-OAA funded activities that are offered in the senior center. The center's implementation of voluntary contributions shall be based on the center's policy.

The written policy shall be translated into languages that are most often spoken in the senior center and displayed in a common area of the senior center for the benefit of individuals who use the senior center. The policy shall be shared with new senior center participants when they visit the center and included in the agency newsletter for the benefit of regular users of the senior center. The center shall solicit input from senior center participants in the development of the policy, and which can be accomplished through consultation with an established advisory board; a listening session/focus group, or an anonymous survey.

Each senior center may develop a suggested contribution schedule for services to be included in the senior center policy. In developing a contribution schedule, the senior center shall consider the income ranges of older persons in the community and the provider's other sources of income.

The policy shall include the following elements:

- OAA funded services are for any older adult 60 years of age and better;
- No one over age 60 will be denied services from OAA programs. All older adults age 60 years of age and older will have equal access to OAA funded activities and services in the senior center without regard to economic or social status, race, color, religion, gender, sexual orientation, gender identity or expression, national origin, language spoken, disability, or other aspects of what we look like or where we come from.
- Each individual will be provided an opportunity to voluntarily contribute to the cost of the service;
- Contributions will be encouraged for individuals whose self-declared income is at or above 185% of the poverty line, at contribution levels based on the actual cost of services;
- There is no obligation to contribute, the contribution is purely voluntary;
- Describe the center's scholarship program for fee-based, non-OAA activities, if any, and the conditions under which an activity fee will

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be waivered, if applicable; for example if the individual's income was at or below the federal poverty level.

- Develop a visitor policy either through a non-member fee for activities or a day pass, perhaps limiting such visits to once a month or some other basis that reflects occasional visitation.
- Protect the privacy of each participant with respect to his or her contribution or lack of contribution;
- Establish appropriate procedures to safeguard and account for all contributions;
- Use all collected contributions to expand the service for which the contributions were given and to supplement (not supplant) funds received under the OAA Act;
- Describe the process by which changes to the policy are made, how that is communicated to senior center participants, and that ample time is given to participants to respond to proposed changes to the policy; and
- Changes to the policy cannot be implemented without the knowledge and approval of ADS.

## **7. Question:** How will senior center compliance with this policy be monitored?

**Answer:** ADS will review the center's policy initially at the time of contract and thereafter when proposed changes are made to the policy to ensure compliance with the ADS policy.

Additionally the ADS contract monitoring plan includes periodic site visits to the senior center to evaluate service delivery, the senior center facility and customer satisfaction. At the site visit ADS will request the center's policy in all formats that are available to individuals who visit the center; ADS will look for the display of the policy in a common, visible and accessible location in the senior center; ADS will include a question on the participant interview that asks if the policy was shared with them during their first visit to the center and if they were involved in the development of the policy or its modification; and, ADS will look for evidence of the policy in the senior center newsletter.

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