Aging I&R/A

Inclusion/Exclusion Policy Development Guide
for Aging Information & Referral/Assistance

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About the National Aging Information & Referral Support Center

Established in 1990, the National Aging Information and Referral Support Center works to ensure that callers referred to aging I&R/A networks throughout the country receive the highest quality and most professional service possible. Funded by the U.S. Administration on Aging, the Center provides a full range of assistance at the state and local levels on I&R/A systems design and management, quality improvements in I&R/A service delivery, and professionalism and training of the aging I&R/A workforce.

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www.nasua.org/informationandreferral/

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Exhibits

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I&R Inclusion/Exclusion Criteria and Policy Examples

We gratefully acknowledge permission to excerpt and reprint portions of I&R/A policy statements from the following organizations:

AGING I&R/A ORGANIZATIONS

Alabama

ELDERCONNECT ALABAMA
Alabama Department of Senior Services
770 Washington Ave. RSA, Plaza Suite 470
Montgomery, Alabama 36130
(334) 242-5743 1 (877) 425-2243
ageline@adss.state.al.us
www.ageline.net/eca/

California

BUTTE COUNTY NETWORK OF CARE
PASSAGES Adult Resource Center
Information & Assistance Program
2491 Carmichael Drive, Suite 400
Chico, CA 95928
(530) 898-5923
acook@csuchico.edu
http://butte.networkofcare.org/aging/resource/find.cfm

CONTRA COSTA COUNTY ONLINE RESOURCE DATABASE (CORD)
(comprehensive/crisis line/2-1-1/aging I&R/A provider)
Contra Costa Crisis Center
P.O. Box 3364
Walnut Creek, CA 94598,
(925) 939.1916 Fax: (925) 939.1933
cord@crisis-center.org
www2.irissoft.com/cccc

CONTRA COSTA COUNTY NETWORK OF CARE
(Web-based resource directory updated in parallel with Contra Costa CORD)
Area Agency on Aging of Contra Costa County
Aging & Adult Services
2530 Arnold Drive, Suite 300
Martinez, CA 94553-4359
(925) 335-8720

http://contracosta.networkofcare.org/aging/home/index.cfm

www.ehsd.org/adult/adult014.html

AREA 1 AGENCY ON AGING OF DEL NORTE & HUMBOLDT COUNTIES
(Aging & Disability Resource Center)
Area 1 Agency on Aging
3300 Glenwood Street
Eureka, CA 95501
(707) 442-3763   Fax: (707) 442-3714
www.rtmdesigns.net/A1AAEureka/?0
www.a1aa.org/

ORANGE COUNTY OFFICE ON AGING
Orange County Office on Aging
Community, Services Agency
1300 S. Grand Avenue, Bldg B
Santa Ana, CA 92705
(714) 567-7500   Fax: (714) 567-5021
Officeonaging@ocgov.com
www.officeonaging.ocgov.com/guide.asp
www.officeonaging.ocgov.com

SAN DIEGO NETWORK OF CARE
Aging and Independence Services
(AAA/Aging & Disability Resource Center)
9335 Hazard Way, MS W-433
San Diego, CA 92123
(858) 560-2500   (800) 510-2020 *(Home Assist Program)*
http://sandiego.networkofcare.org
www.sdcounty.ca.gov/ais

Georgia

AGEWISE CONNECTION – AGING & LONG TERM CARE DATABASE
Patrice Earnest, Aging Resources
Area Agency on Aging
Atlanta Regional Commission
40 Courtland Street, NE
Atlanta, GA 30303
(404) 463-3100
Pearnest@atlantaregional.com
www.agewiseconnection.com
www.atlreg.com/aging/aging.html

Minnesota

MINNESOTAHELP.INFO
Minnesota Board on Aging
444 Lafayette Road North
St. Paul, MN 55155-3843
(651) 296-2770   Fax: 651-297-7855
providerupdates@housinglink.org
www.minnesotahelp.info

North Carolina

REGION A HUMAN SERVICES DIRECTORY
Southwestern N.C. Planning & Economic Development Commission
P.O. Box 850
Bryson City, NC 28713
(828) 488-9211   Fax: (828) 488-3950
www.regiona.org/aging.htm

JUST1CALL
(County-wide public/private partnership; provider database maintained in partnership with United Way of Central Carolinas)
Joan Gresham, Just1Call Program
Mecklenburg County Department of Social Services
Wallace H. Kuralt Centre
301 Billingsley Road
Charlotte, NC 28211
(704) 432-0316   Fax: 353-0651
Greshje@co.mecklenburg.nc.us
www.just1call.org

New Mexico

AGING AND LONG-TERM CARE RESOURCE CENTER
New Mexico Aging and Long-Term Care Services Department
Attention Resource Center
Toney Anaya Building
2550 Cerrillos Road
Santa Fe, NM 87505
(505) 476-4799   (800) 432-2080 *(toll-free in New Mexico)*
nmaoa@state.nm.us
www.nmaging.state.nm.us/resourcectr.html

New York

CENTRAL REFERRAL SERVICES, INC.

(Private/nonprofit comprehensive I&R, includes AAA copyrighted caregiver resources in 1 of the 3 counties)

Central Referral Services, Inc.
City of Buffalo City Hall
Buffalo, NY 14202
(716) 851-5555,
webmaster@centralreferral.org
www.centralreferral.org

Ohio

INFO LINE, INC., SUMMIT COUNTY

(Comprehensive I&R/2-1-1/aging I&R/A provider)

Info Line, Inc.
474 Grant Street
Akron, OH 44311
(330) 762-5627
Fax: 253-1137
rbstahl@infolineinc.org
www.infolineinc.org/senior.htm

AAA DISTRICT 7, INC. RESOURCE DIRECTORY

(Internal resource directory)
Area Agency on Aging, District 7, Inc.
160 Dorsey Drive
Rio Grande, Ohio 45674-0500
(800) 582-7277
www.aaa7.org

DISTRICT 5 AAA RESOURCE DIRECTORY

(Internal resource directory)
Ohio District 5 Area Agency on Aging, Inc.
780 Park Avenue West
P. O. Box 1978
Mansfield, OH 44901
(419) 524-4144
od5aaa@agingnorthcentralohio.org
www.agingnorthcentralohio.org

Oregon

MULTNOMAH COUNTY AGING & DISABILITY SERVICES

(Internal resource directory)
Kathleen McHarg
Multnomah County Aging & Disability
Services
421 SW 6th Avenue, Suite 300
Portland, OR 97204
(503) 988-3620
kathleen.mcharg@co.multnomah.or.us
www.co.multnomah.or.us/ads/

Virginia

SENIORNAVIGATOR.COM

(Public/private partnership, updates provided by Area Agencies on Aging)
Katie Roeper
SeniorNavigator
600 E. Main Street, Suite 360
(804) 827-1280   Fax (804) 827-1281
kroeper@seniornavigator.com
www.seniornavigator.com

Washington

SENIOR SERVICES ONLINE

(Aging I&R/A provider)
Michelle Espeut, Resource Database
Manger, Senior I&A
Senior Services of Seattle/King County
2208 2nd Avenue
Seattle WA, 98121
(206) 727-6229
MichelleE@seniorservices.org
www.seniorservices.org

COMPREHENSIVE AND/OR OTHER SPECIALIZED I&R ORGANIZATIONS

California

HELPCENTRAL.ORG

(Comprehensive I&R, funded by Butte County Children and Families Commission and Butte County Department of Employment and Social Services with collaborating agencies, including Butte County Passage)
www.helpcentral.org

INFONET TUOLUMNE COUNTY

(A project of Amador-Tuolumne Community Action Agency with public and private funding)

Julie Plevancic
InfoNet Tuolumne County
427 N. Highway 49 #302
Sonora, CA 95370
(209) 533-1397 x 274
Julie@infonettc.org.
http://infonettc.org

Connecticut

INFOLINE 2-1-1

(Comprehensive I&R and 2-1-1)

United Way of Connecticut
1344 Silas Deane Highway
Rocky Hill, CT 06067-1350
(860) 571-7500
Fax: 860-571-7525
infoline@ctunitedway.org
www.infoline.org

Idaho

IDAHO 211 CARELINE

(Statewide 2-1-1)
www.idahocareline.org
Contact:
Idaho Department of Health and Welfare
(800) 926-2588
careline@idhw.state.id.us

Louisiana

232-HELP/211 ACADIANA RESOURCES

(Comprehensive I&R)

Resource Manager, Resource Department
Southwest Louisiana Education and
Referral Center
P.O. Box 52763
Lafayette, LA 70505
(337) 232-4357
help@232-help.org
www.232-help.org

Wyoming

CONNECT WYOMING — PATHWAYS PLUS

(Partnership of Wyoming Institute for Disabilities and the University of Wyoming (comprehensive statewide I&R; includes "Seniors Pathways")

Connect Wyoming
Department 4298
1000 E. University Avenue
Laramie, WY 82071
(307) 766-2996 or (307) 776-2720 (TTY)
connect@uwyo.edu
http://wind.uwyo.edu/connect/default.asp

Preface

Aging I&R/A is a rapidly changing and expanding field, and more change can be expected in the future. Political and fiscal dynamics, in concert with changes in the technological landscape, standards and best practices, are broadening the scope and importance of I&R/A activities.

Aging I&R/A systems across the country are working diligently to meet the public's need for accurate, up-to-date, and easily accessible information and assistance. Interoperability with other I&R resource database systems— the ability to exchange information and work across systems—is now achievable.

Interoperability offers many advantages in reducing duplication of effort and increasing the cooperation of the community at large. But at the same time it can also lead to confusion and disconnects, absent a clear vision of the aging I&R/A's purpose, values, procedures, and unique areas of expertise.

That is why aging I&R/A inclusion/exclusion policy is so important. The trick isn't only in the technology, but in figuring out how all the pieces— the various and evolving roles of I&R/A, the constantly expanding networks of services, particularly in the private sector, and the ever-shifting community demographics and needs— fit together.

Policy development need not be done in a vacuum. No matter where you find yourself in the process, we recommend that you take advantage of all the resources available to help you with this process. Some examples include:

- *Official Compilation of Older Americans Act as Amended in 2000*
- *Vision 2010: Toward a Comprehensive Aging Information Resource System for the 21st Century*
- *Setting Inclusion/Exclusion Criteria: Determining the Scope of a Resource File*
- *AIRS Standards for Professional Information and Referral Systems*

We also recommend that you seek out guidance from your peers. There is a lot of knowledge out there waiting to be tapped. The universe of I&R systems can also be a great source of expertise and collaborative opportunities.

Keep in mind that inclusion/exclusion policy is a working document. Existing procedures may evolve over time. Regularly scheduled policy reviews can ensure consideration of any emerging issues or challenges.

To maximize your efforts, take care to create policy from your clients' perspective. Aging I&R/A of course, is much more than specialized I&R: it is the gateway to a full array of programs and services that assist older adults and their caregivers— and often persons with disabilities— to lead lives of dignity and choice within their preferred home and community settings. Keeping decision making as close to the client as possible is the principle aim of this Guide.

How to Use This Guide

What follows should be regarded less as a handbook of instruction than as a compilation of suggestions, experiences, and ideas from the field. For your convenience, the Guide is divided into two parts. Part one gives the I&R/A policy developer a general orientation. Part two explains point by point the elements of an inclusion/exclusion policy using extensive examples to illustrate. The verbatim excerpts from aging I&R/A inclusion/exclusion policies included the Appendix exemplify some of the "best practices" in the field.

By design the Guide's coverage is broad. Whether starting from scratch or revamping an existing inclusion/exclusion policy, the aim is to assist state and community aging I&R/A services in creating policies that are customized to meet people's real-world needs.

As a final point, nothing in this Guide is academic or theoretical. Our purpose is to offer members of the aging I&R/A community a wide range of ideas and practical examples to *act* on and to put into use for I&R/A inclusion/exclusion policy making.

Part One

The Policy Process: An Overview

1 Setting the Stage: Policy Development Considerations

Geographical Scope

The first step in designing a database inclusion/exclusion policy is to specify your geographic parameters.

The range of definitions will vary depending on the system. For example, some states integrate resources into in a single 'statewide' database. Others have developed 'collective statewide databases,' which allow local providers to create their own subdomains with locally relevant relevant information and resources. In other states, area agencies on aging and their providers decide how aging I&R/A databases are designed for their geographic areas.

Whatever the scenario, an overarching strategy or policy at the state level can serve serve as an important guidepost for local aging I&R/As to use in setting their own criteria. Keep in mind a successful policy needs to be flexible.

Vision, Mission and Goals

As you have no doubt discovered, policies built from a common mission, vision, goals, and quality assurance standards are good for both providers and consumers. In the field of aging I&R/A, we are fortunate to have:

- A solid record of achievement under the Older Americans Act;

- Strong partnerships across the aging network and with other disciplines, including the Alliance of Information and Referral Systems; and

- A shared philosophy as articulated in *Vision 2010: Toward a Comprehensive Aging Information Resource System for the 21st Century.*

As defined by the Older Americans Act Amendments of 2000, a successful aging I&R/A service:

Provides[older] individuals with current information on opportunities

and services available to the individuals within their communities, including information relating to assistive technology; assesses the problems and capacities of the individuals; links the individuals to the opportunities and services that are available; to the maximum extent practicable, ensures that the individuals receive the services needed by the individuals, and are aware of the opportunities available to the individuals, by establishing adequate follow-up procedures; and serves the entire community of older individuals, particularly older individuals with greatest social need, and older individuals with greatest economic need.

Vision 2010, as adopted by the membership of the National Association of State Units on Aging (NASUA) and leadership of the National Association of Area Agencies on Aging (N4A), is a vision for a comprehensive, nationwide aging information and resource system in which information and assistance are easily and universally accessible to older Americans, their families and the public.

Its goal is a nationwide system that is:

- Comprehensive
- Universally accessible
- Seamless
- Technologically and operationally up-to-date
- Committed to the highest quality of service

The AIRS Standards for Professional Information and Referral, first published by the Alliance of Information and Referral Systems in 1973, covers all key aspects of planning and implementing a high-quality information and referral service.

To aid the very specialized field of aging I&R/A, in 2001 NASUA's National Aging I&R Support Center produced a companion reference guide, titled *AIRS Standards for Professional Information & Referral: Assessment and Implementation Guide for Older Americans Act Information & Referral/Assistance Programs.*

A practical reference for successful I&R/A, the guide is a useful source

to consult as you undertake to develop your policy for inclusion/exclusion. For further reference, the chart below summarizes the AIRS standard for inclusion/exclusion.

Exhibit 1-1. AIRS Standards/Accreditation Criteria Related to Inclusion/Exclusion in the Resource Database

Standard 5: The I&R service shall develop for the inclusion or exclusion of agencies and programs in the resource database. These criteria shall be uniformly applied and published so that staff and the public will be aware of the scope and limitations of the database.

Sub-component 1: There are a number of requirements related to Inclusion/Exclusion Criteria including the following:

- The I&R service shall have a written policy that describes inclusion/exclusion criteria for the resource database. The I&R service shall review the inclusion/exclusion criteria on a regular basis (at a minimum, every three years) to ensure that they continue to meet the changing needs of the community.

- These criteria shall be published so that staff and the public will be aware of the scope and limitations of the database.

- These criteria shall be uniformly applied.

- If the I&R service is comprehensive, the inclusion/exclusion criteria shall address the needs of all groups in the community; shall include government, nonprofit and critical for-profit organizations; and may include other for-profit organizations and entities such as support groups that are not incorporated as organizations.

- If the I&R service is specialized, the inclusion/exclusion criteria shall adequately address the needs of its target population and shall have referral points for types of services that are excluded.

- If the I&R service charges a fee for the inclusion of organizations in its database, that practice shall be published as a part of its inclusion/exclusion criteria.

When you create your own vision, mission, and goals statement, it is important to clarify and delineate the varied roles that your service plays, the multiple programs for which it is responsible, its links to the larger community, as well as target audiences. Exhibit 1-2 gives you an inkling of just some of the possibilities.

Exhibit 1-2. Aging I&R/A Today: Gateway to Complex State/Local Aging Service Systems

Expanded Roles of Aging I&R/A
Entry point for home and community based services (HCBS)
Access to comprehensive in-home assessments for HCBS
Link to case management
Family Caregiver Support Program
Health insurance counseling
Medicare fraud and abuse
Prescription drug assistance
Medicare Modernization Act Rx outreach
Entry point for persons with disabilities
Transportation services
Aging & Disability Resource Centers
Volunteer services
Healthy aging
2-1-1

Multiple Programs
National Family Caregiver Support
HCBS case management
Pension counseling
State Health Insurance and Assistance (SHIP)
Medicare Patrol
Medicare Modernization Rx outreach
State Pharmaceutical Assistance Program
Senior Center Information Program
Nutrition counseling
2-1-1

Links To Other Aging Services Programs
Long-term care ombudsman
Legal services
Adult protective services
State Medicaid agency

Links To The Larger Universe Of I&R
2-1-1
Comprehensive I&Rs
Child resource and referral
Crisis services
Disaster services
Military Family Service Centers

Expanded Populations
Caregivers for persons age 60+ (and younger in some states)
Grandparents (some state programs serve under age 60)
Persons with disabilities: physical, developmental, and mental
Children and youth

Purpose of the Policy

A policy for inclusion/exclusion informs the overall direction for an organization's I&R/A resource database, including the taxonomy. The policy should be a written statement, and it should be shared widely. To be credible and avoid any confusion, it should be clear and unambiguous. It should also be carefully and consistently applied.

In I&R/A, objectivity is important, particularly if an exclusion or inclusion decision is ever protested.

The taxonomy or structure of the database should be customized to support the overall policy, as well as to guide the categorization of resources approved for inclusion.

Target Audiences

Older Americans Act I&R/A offers assistance to millions of older Americans and their families nationwide. In addition to the general population that each I&R/A is expected to serve, an aging I&R/A may also specialize in reaching out to certain priority groups and special populations like those listed below:

- Low-income minority elders and their families
- Non-English and limited English-speaking people
- Rural elders
- Adults and/or children with disabilities
- Grandparents raising grandchildren
- Medicare beneficiaries
- People potentially eligible for Medicaid or Medicaid long term care benefits
- Lesbian, gay, bisexual, and transgender (LGBT) communities

One of the easiest ways to define your desired target audiences is by deciding who you want to reach first first, which second, and so on. The simplest method is to group your target audinces as primary, secondary, and tertiary.

To be responsive to diverse client needs, keep in mind that America's

demographics are changing rapidly. Among the key demographic changes, for example:

- Aging of the population and large increases in the over-85 group

- More cultural and ethnic diversity

- Many non-English speakers

- Healthier, more informed elders

- Rise in overall education; but many under-schooled elders

- Wealthier overall; but also very poor elders

- More living alone, living with non-relatives, divorced, and/or never married

- Expanded use of technology

- More diversity of choices, decisions

Which population groups do you serve? Exhibit 1-3 identifies some of the possible target groups. The list is not meant to be exhaustive; it is intended to stimulate your thinking.

Exhibit 1-3. Determine Who Will Benefit from Your Resource Database

- Older Adults
- Minorities
- Unpaid Family Caregivers
- Limited English –Speaking
- Low Income
- Grandparents Raising Grandchildren
- Lesbian, Gay, Bisexual, & Transgender (LGBT) Communities
- Persons Potentially Eligible for HCBS, State General Revenue, and/or Medicaid Waiver Programs
- Persons with Disabilities
- Volunteers
- Medicare Beneficiaries
- Paid Caregivers
- Pre-Retirees
- Professional Colleagues
- Community Partners
- Community Planners
- Researchers
- Media
- Other

Assuring Non-Duplication

Aging I&R/As are a specilized service, and they operate in two distinct, albeit closely connected, networks: the national aging services system and the larger universe of information providers.

Cooperation and collaboration are essential to the success of an aging information and resource system. I&R/A services that make a concerted effort to reach out to and work with other community partners will maximize resources and minimize unnecessary duplication. Some examples of collaborative opportunities include:

- Shared statewide/regional aging network resource databases or database collaborative;

- Statewide/ regional/ community comprehensive I&R resource databases or collaborative for interconnectivity; and

- Statewide and/or community level planning processes for 2-1-1.

Obviously before you begin the task of writing policy, it is important to do your research. Talk other I&R services to find out what is already in place – as well as what is in the works – to make sure you are not working at cross purposes.

To cut costs and allow for more information sharing, remember to keep an eye open to network compatibility and interoperability.

The XML (EXtensible Markup Language) Data-transfer Protocol developed by the Alliance of Information and Referral Systems is an example of a tool that enables sharing of data among incompatible systems. Visit the AIRS Library at *www.airs.org/pub/pub_library.asp* for more information.

2 Building Community Support

One of the most effective strategies for addressing the issue of stakeholder buy-in is engaging a community advisory workgroup.

In building community support you will want to involve the larger universe of I&R and other key stakeholders in your area who can help you to refine the policy before releasing it publicly.

The selection of workgroup participants will vary depending on the scope of your database. Some individuals could take active roles, while others would more appropriately be available for consultation.

There are at least two reasons to include state and community partners and other stakeholders in the development process:

- To get feedback on ways to make the inclusion/exclusion criteria and policy useful and relevant to stakeholders and consumers; and

- To assist in building statewide or community buy-in and ongoing success of the final product.

Another important contribution is their knowledge of other statewide or community resource databases and how the policy might add or detract from future interoperability.

Partnerships forged through involvement in the workgroup may yield future dividends. For example, regulatory agencies might be willing to provide updates to the resource database on newly licensed/certified organizations, as well as those with license revocations and/or citations.

Additional strategies for involving stakeholders include focus groups, online surveys, interviews, field trials, and review teams.

In the following chart are possible workgroup members you may wish to consider.

Exhibit 1-4. Potential Policy Development Workgroup Participants

Geographic Area	Aging I&R/A	Other Aging Network Services	Larger Universe of I&R/A Statewide, Within PSA, or Local Provider Representatives as Appropriate/Available	Other Statewide, Within PSA, or Local Provider Representatives as Appropriate/Available
Statewide	▪ SUA I&R Liaison ▪ Combination of AAA and local I&R/A reps ▪ Title VI aging I&R/As or similar ▪ State advisory committee and/or governing body reps	▪ AoA regional rep ▪ Other SUA – OAA Title III program staff as appropriate (NFCSP, SHIP, Nutrition, Health Promotion, Personal Care, Transportation, etc.) ▪ SUA – OAA Title VI liaison ▪ SUA – OAA Title VII elder rights program staff (SHIP, Medicare Patrol, Legal Services Developer, APS, LTC Ombudsman, etc.)	▪ AIRS affiliate rep ▪ State/local designated 2-1-1 entity ▪ Public disability services agency ▪ Child resource & referral ▪ Disaster/emergency services ▪ Military – Family services centers ▪ Mental health/crisis services ▪ Comprehensive I&R (other than 2-1-1) ▪ Independent living center and/or assistive technology center ▪ Library system	▪ Home & community based services ▪ Medicaid agency ▪ Centers for Medicare and Medicaid Services ▪ Social Security Administration ▪ State regulatory agencies ▪ NCOA/Benefits Checkup ▪ State residential long term care services ▪ Residential long term care facilities or associations ▪ Resource database technological experts ▪ Housing & finance authorities ▪ Rural development ▪ Centers for Disease Control/Public Health ▪ Community health ▪ Employment services ▪ State and/or local government reps ▪ Media ▪ Healthcare provider associations ▪ Special populations' resources and reps ▪ Other essential resources
Area Agency on Aging Planning and Service Area	▪ SUA I&R liaison (as available/appropriate) ▪ AAA I&R/A director, coordinator, and/or selected staff ▪ Local I&R/A reps ▪ Advisory committee and/or governing	▪ AAA planner and/or contract specialist ▪ Other AAA – OAA Title III program staff as appropriate (NFCSP, Nutrition, Health Promotion, Personal Care, Transportation, etc.) ▪ AAA – OAA		

	board reps	Title VII elder rights program staff (SHIP, Medicare Patrol, Legal Services, APS, LTC Ombudsman, etc.) ■ Other OAA Title III, VI, and VII providers and grantees		
Local Aging I&R/A Provider Service Area	■ SUA I&R/A liaison (as available/appropriate) ■ AAA I&R/A director, coordinator, or selected staff ■ Aging I&R/A supervisor ■ Advisory committee or governing board reps	■ AAA planner and/or contract specialist ■ Other OAA Title III, VI, and VII providers and grantees		

3 Field Test and Community Response

After the inclusion/exclusion policy is drafted, the next step is to share it with known, respected, and well-established providers and invite them to apply for inclusion in the database.

If you reject a provider applicant, you will need to assess whether the proposed criteria are an issue. Are there missing essential services that ought to be included in the system but for some reason cannot meet the criteria and, if so, what needs to be revised?

After field testing and refining of the policy, the net can be thrown wider to capture a larger group of resources. If the second trial goes well, the next step is to publicize the policy.

4 Publicizing the Policy

As a recent review of aging I&R/A policies makes obvious, inclusion/exclusion policies vary widely in content, format, accessibility, and use. Decisions around whether or not to allow universal access, how to best publicize the new policy, and whether or not to include legal disclaimers seem to depend on the resource databases's purpose, location (Web or local server), and scope.

From the point of view of inclusion/exclusion, an objective stemming from the AIRS Standards for Professional Information and Referral might be:

> To ensure relevant staff and the public are aware of the scope and limitations of the database.

For most aging I&R/As, the public communication channel of choice will be determined on the basis of whether or not the database is web-based, the size and scope of the database, the procedures for adding new resources, and how the database is updated. The chart below, Exhibit 1-6, identifies some possible channels for publicizing the policy.

Exhibit 1-5. Inclusion/Exclusion Dissemination Channels

Communication Channels	Audiences	Opportunities	Other Considerations
Operations Manual Include written regulations for AAAs and I&R/As, with specific staff instructions	▪ All staff involved with operation of database	▪ Provides clear and formal written policy for staff	▪ Additional methods needed to publish for wider public and relevant staff ▪ Can be posted on Intranet/internal Web site for professional staff
Resource Database Application Include in application sent to potential providers requesting inclusion in database. One possible option: Fill-in checklist and signature of responsible party	▪ All community providers potentially eligible for inclusion in the database ▪ All relevant staff ▪ Other interested parties	▪ Provides clear and consistent written policy for community providers ▪ Elicits clear understanding that providers must meet criteria to be included ▪ Providers document understanding of criteria ▪ Opportunity to clarify inclusion as a privledge vs. a right	▪ Consider hard copy form at offrice and electronic form for e-mail/Web site for easy access to more potential providers and public ▪ Community providers will share information among selves and build interest in participation
Complaint Procedure Include complaint procedure as part of written policy	▪ All community partners potentially eligible for inclusion in database (can include with application) ▪ All relevant staff ▪ Other interested parties ▪ Include in written denial of inclusion	▪ Increases formalization of process and understanding that all decisions are based on specific criteria ▪ Providers understand upfront the opportunity to grieve the database owner's decision ▪ Gives staff clear process for handling complaints	▪ Important to share process with all affected staff to ensure consistent response to public ▪ Accessible complaint procedure will help build buy-in and understanding that the policy is fair and professional
State/Area Plan Add to state and/or area plan	▪ Funders and planners ▪ Organization's Web site	▪ Elevates policy to level of systems development; useful for establishing direction of program and forming collaborative partnerships	▪ Important to also disseminate to staff, community partners, and public to facilitate operationalization
Web (Online Databases Only) Articulates the update process, and includes mission statement Articulates online appropriate use policy and information entry tips	▪ Any/all members of the public	▪ Community partners and public can access scope of resource database and organization ▪ Community partners know expectations for updates ▪ Public informed about the update policy ▪ For web-based database where providers enter own information ▪ Community providers describe services in own words ▪ Updates done as	▪ Maximizes exposure to potential includable service providers via the web-based resource database ▪ Need database formatting that allows for direct provider input ▪ Disclaimer needed ▪ Web site operator must have right to edit, change, or delete information and ensure only appropriate information is included ▪ Potential for many services to not be included

		community provider changes services ■ Spreads responsibility among community partners for updating site	due to lack of awareness, staff, time, etc.
Published Policy Statement Written policy with pre-determined service categories or priorities	■ All potentially eligible community partners ■ All relevant staff	■ Further clarifies scope of inclusion, and assists community resources to self-identify for potential inclusion	■ May reduce opportunity for non-traditional, essential services to be included
Targeted Criteria Have different criteria and benefits for providers who pay and do not pay fees	Pay Fees ■ Hard copy/ electronic information available to all community service providers ■ Password protected/provider specific information once fee is paid Do Not Pay Fees ■ Public information ■ Public Web site pages ■ Awareness of fee option	Pay Fees ■ Increases funding base for database ■ Enhances benefits for fee payers ■ Method for inclusion of for-profit essential services Do Not Pay Fees ■ Still included if meet criteria	Pay Fees ■ Benefits might include links, enhanced program information, and access to other parts of database (e.g., CM, calendar, volunteer tracking, fundraising, etc.) Do Not Pay Fees ■ Web site still inclusive of all essential community resources
Do Not Publish No inclusion/ exclusion criteria published	■ None ■ Inclusion by invitation	■ Resource database owner makes all decisions	■ Disclaimer needed ■ Policy: Database owner owns all data ■ Potential for complaints, especially if publicly funded

5 Policy Updates and Revisions

To ensure aging I&R/A databases are current, effective, and continue to meet the needs of the public, inclusion/exclusion policies should be be reviewed periodically.

Some possible strategies for review of policy are:

- *Establish a review team* composed of former policy development workgroup or review team member organizations convening as needed and in compliance with the policy review period.

- *Conduct a short electronic survey* to currently included resources and selected stakeholders to determine successfulness of current policy and potential changes for the future.

- *Undertake a periodic review* of denied organizations and specific reasons for denial to determine potential trends and changes in the current policy.

Update schedules vary by organization. The AIRS standard specific to policy review period states:

> The I&R service shall review the inclusion/exclusion criteria on a regular basis (at a minimum, every three years) to ensure that they continue to meet the changing needs of the community.

Depending on the I&R/A, a more generic policy may function well for three years, whereas a detailed and complex policy with defined categories and/or priorities may need more frequent updates to keep pace with program diversification or integration, funding stream requirements, and demographic changes.

Part Two

Inclusion/Exclusion Criteria: Decision Points and Examples

6 Getting Everyone on the Same Page

Once the scope, direction, and principles of the policy are defined, formatting and design determined, and development process agreed to, it is time to focus on creating and writing specific inclusion and exclusion criteria. In this section, we highlight considerations for inclusion/exclusion criteria, and offer examples for the elements and phrasing that might be considered in a policy document.

The section begins with a definition of inclusion and exclusion. It then considers areas most commonly covered by inclusion criteria. Lastly, it reviews possible exclusion parameters.

'Wordsmith' options are presented throughout the text; however, you most likely will want to customize the phrasing of each criterion so that it best fits the breadth of your resource database, as well as the culture, target population, and goals of your organization and its partners. You may decide to pick and choose the order in which you decide on criteria, or you may want to read the entire section first before deciding on a process.

Aging I&R/A is constantly growing and evolving to include new populations, programs, and services. Through a formalized ongoing review process the criteria will most likely change over time. In the meantime, it is important to always provide staff and the community at large with clear, concise, and *objective* criteria on which to build the database and make decisions. Legal consultation and review are suggested before all criteria are finalized.

Definitions: Inclusion and Exclusion

"Inclusion and exclusion" are often taken to mean opportunity/acceptance and rejection/censure. In the world of I&R/A, however, it is an approach for clarifying which services and provider entities most clearly meet the purpose to provide improved access to essential community services for a certain portion of society within a specific geographical area.

The terms are often defined differently by different I&R/As. Exhibit 2-1 highlights a few examples.

Exhibit 2-1. Defining Inclusion/Exclusion: Database Purpose, Description, Geography

Examples – Aging I&R/A

CALIFORNIA: Del NoretA1AA (ADRC grantee)

AAA Policy: Senior I & A brings people and services together through our call center services, database and publication services, and a web resource service. Our goal is to connect clients to health and human service providers that cover a broad range of programs and services, from access to basic necessities to the enhancement of personal and social growth. These services may be provided by governmental agencies, health services, non-profit organizations, or an organization that provides a unique, specifically targeted or difficult to access service.

North Carolina: Region A (AAA)

AAA Policy: Southwestern Commission Area Agency on Aging collects and classifies information about Health and Human Services available to the citizens of Cherokee, Clay, Graham, Haywood, Jackson, Macon and Swain Counties and the Eastern Band of Cherokee Indians.Health and Human services are defined as those services which address human needs ranging from basic living needs (food, shelter, clothing) to life improvement or enhancement. Health services include both physical and mental health programs. Inclusion /exclusion criteria shall be reviewed on an annual basis or when a change in service permits the addition of resources.

MASSACHUSETTS: Montachusett Home Care Corporation

Local Aging I&R/A Provider Agency Policy: The Resource Directory shall be a compilation of information that identifies opportunities, resources, services and providers in all areas relevant to the needs and problems of older people and shall include local, state and federal resource material, and when known, current eligibility criteria.

MINNESOTA: MinnesotaHelp.info

Statewide Policy: MinnesotaHelp.info is the State of Minnesota's online access point for information about health and human service agencies and programs. Citizens can search the database any day or any time from the convenience of their own home. The services are organized by a geographic location and by topics. Consumers can locate general information for families and children and in depth information for seniors and caregivers. Soon the online database will include in depth information for persons with disabilities, HIV/AIDS, chemical health problems, and mental illness

OHIO: District 5 Area Agency on Aging, Inc. Beacon I&R Maintenance Procedure

AAA Policy: Purpose: To maintain as comprehensive a file as possible of agencies and programs whose services are directed toward the needs of the disabled and older adult population in our Planning and Service Area.

Exhibit 2-1. Defining Inclusion/Exclusion: Database Purpose, Description, Geography (Cont'd)

Examples – Aging I&R/A

OKLAHOMA: I&A Methods Policy

Statewide Policy: Instructions to Staff:

(A) Classification system. The I&A service uses a classification system based on standard service terminology, such as United Way of America Services Identification System (INFO-LINE Taxonomy), National Association of State Units on Aging (NASUA), and National Association of Area Agencies on Aging (NAAAA). The I&A service may develop variations in the classification system to adapt it to the community's size, nature, and organizational needs. The classification system is used for purposes of:

   i.   retrieving service information;

   ii.   increasing the reliability of planning data;

   iii.   making comparison and evaluation processes consistent and reliable; and

   iv.   facilitating national comparisons of data

(B) Resource file. The I&A service develops, maintains, and uses an accurate, up-to-date resource file that contains information on available community resources and produces detailed data on service providers in the area that are responsive to the needs of senior citizens and their caregivers.

WASHINGTON: Senior Services of Seattle/King County

Local Aging I&R Provider Agency Policy: The purposes of the Senior Information and Assistance (I&A) resource file are to catalog community services, maintain accuracy of community information, provide information to older people, those who care for them and the public at large, and link people with needed service.

In his article, *Setting Inclusion/Exclusion Criteria: Determining the Scope of a Resource File,* Manikowski notes:

> Agencies and organizations which are either refused inclusion in a file or directory or are initially included and subsequently removed will generally not be happy about it. Referral agencies need to prepare service providers for this possibility by helping them understand that inclusion is a privilege rather than a right.

The concept of inclusion as a privilege is imparted in various ways. Some examples of this can be found in letters and application forms sent to service providers or posted on Web sites, in disclaimers, as part of a policy's introduction or purpose, as one of the actual exclusion criteria, and in grievance procedures. Several examples are detailed in Exhibit 2-2.

Exhibit 2-2. Defining Inclusion/Exclusion: Concept of Privilege Rather Than a Right

Examples – Aging I&R/A

MINNESOTA: MinnesotaHelp.info

One of the exclusion criteria:

The Minnesota Board on Aging reserves the right to exclude any agency.

NORTH CAROLINA: Just1Call of Mecklenburg County

Above name input line in online application form:

I certify that the information provided is true and accurate to the best of my knowledge. I understand that Just1Call does not guarantee inclusion in its health and human services database and listing of agencies and programs is based on established inclusion criteria. I understand that this information may be provided to individuals and published in a variety of formats, and that listing or publication of information does not guarantee referrals for services. I also agree to inform Just1Call of any agency or program changes or discrepancies.

OHIO: Area Agency on Aging District 7, Inc.

Part of the exclusion policy:

The Area Agency on Aging Dist. 7, Inc. reserves the right to exclude and/or remove any agency/organization/group from the Resource Directory database.

Washington - Senior Services of Seattle/King County

Follows exclusion criteria:

Senior Information and Assistance reserves the right to make the final determination as to what organizations are included in the database and may remove or exclude any organization for fraud misrepresentation, discrimination, service non-delivery or any other reason.

Examples – Comprehensive or Other Non-Aging Specialized I&R

GEORGIA: United Way 211 of Central Georgia

From "purpose" section of policy:

Purpose: United Way 211 was created as a community connection to help individuals, families and communities to find the help they need or to help others. The database will contain information about service providers that enhance the quality of individual and community life with a focus on charitable, health and human services.

Inclusion in the United Way 211database means that our trained Call Center Agents will provide interested callers with information regarding your organization's services. Please keep in mind that inclusion in the United Way 211database does not imply endorsement by United Way of Central Georgia and we will make every effort to provide our callers with as many referrals as possible to meet their needs so as not to overburden any one agency.

United Way 211 is not responsible for the quality of service delivered by an agency to which the caller is referred; nor does United Way 211 recommend or endorse agencies. All organizations under consideration must have a history of providing services for at least 6 months. United Way 211 reserves the privilege of final determination of the appropriateness of an organization for the information database.

Another method utilized to define inclusion and exclusion criteria is determining if a potential organization provides a service within defined parameters, for example fitting into the structure of either the taxonomy or prioritized service categories. Exhibit 2-3 gives two examples.

Exhibit 2-3. Defining Inclusion/Exclusion: Fitting Into the Taxonomy or Prioritized Service Categories

Examples – Aging I&R/A

CALIFORNIA: Area 1 Agency on Aging (A1AA)

Previous to inclusion/exclusion criteria:

In collecting and maintaining information about programs and services listed in our data bases, publications, and web sites, we give first priority to information about services that are free, low cost or subsidized, and meet basic subsistence and survival related services. This may include other information and referral organizations. This does not imply endorsement or lack of endorsement for any included or excluded organization (see inclusion/exclusion).

This document's purpose is to provide an outline for those receiving services from Senior Information and Assistance centers, and for listing or delisting provider services.

Client Triage – Services for people who may experience barriers to service because of the following factors receive first priority: Age including risk factors associated with infants, children, youth or seniors; Low income; Unemployment or lack of education or literacy; Physical, mental or developmental disabilities; Homelessness or social isolation; Immigration or refugee status; Fear of violence.

- *First Priority Client Needs*: Food, clothing and shelter; Emergency assistance; Crisis intervention; Financial assistance; Legal and correctional services; Victim services; Immigrant and refugee services; Physical and mental health; Employment and training; In-Home support services; Childcare I & R Councils.

- *Second Priority Client Needs:* Education; Recreation; Consumer assistance; Environment; Things readily available in phone book.

GEORGIA: Atlanta Regional Commission AAA

Part of inclusion criteria:

Providers will be listed in the database ESP/CONNECT if they:

- Provide services to the community in at least one of the categories defined by CONNECT's Taxonomy of Aging and Long-Term Care Services

7 Scope of Resources for Inclusion

Criteria: Subject Areas

The aging I&R/A is a gateway to a complex and multi-faceted aging services network. Individuals who access aging I&R/A resource databases may be looking specifically for age-related support services, but they may also want to know about other resources, including but not limited to: healthcare, healthy aging, financial, education, childcare, mental health, disability, housing, employment, domestic violence, disaster response, and private-pay options.

To determine the scope of subjects for a resource database, the aging I&R/A will need to consider what is already available, as well as gaps in other resource databases regarding services essential to the target population.

A decision needs to be made about for profit organizations delivering services to the homes of older adults, persons with disabilities, and the general public. Most aging I&R/As have moved beyond only including services funded under the Older Americans Act or those provided by state and area agencies on aging and subcontracted provider agencies. Several now include "any and all" services having relevance for their target audiences.

Adding new populations, such as caregivers and/or persons with physical, developmental, or mental disabilities, opens up opportunities for further inclusion – as well as review of other resource databases to identify overlap and gaps. Although certain resources may be identified as population-specific, it is important to keep in mind that people have diverse needs.

For example, an older adult may need help with meal preparation, but also may want to know about accessible fishing locations, assistive technology, grocery delivery, bereavement services, and continuing education classes. A person with a disability may need information on disability advocacy organizations, but may also want to learn about educational and employment opportunities, personal care services, social events, and so on.

Another thing to consider is deciding to what extent certain subjects should be prioritized. A resource database will ideally include all resources available to all target populations. Priority setting decisions must take into account staffing, resources, software, and update procedures to ensure the

aging I&R/A has adequate capacity to maintain an up-to-date and accurate database reflective of the organization's mission and target population(s). Under this framework, it is important to consider:

- *Current status:* If the current status of service access best serves customers and partners;

- *Timeframe:* If additional subject areas can be added over time; and

- *Integrated systems:* If opportunities for cross-referral protocols, partnerships, posting links, and database interoperability have been fully explored.

There may be some ways by which essential subjects are available without all of them being the proprietary responsibility of the aging I&R/A. The examples below give some concise parameters for subjects included in the respective databases. They do not, however, span all possibilities. Other guidance can be obtained by reading existing inclusion/exclusion policies.

Exhibit 2-4. Scope of Resources for Inclusion: Sample Descriptions of Subject Area

Examples – Aging I&R/A

ALABAMA: ElderConnect Alabama (statewide; SUA)

Providers will be listed in the CONNECT database if they: Provide services to the community in at least one of the categories defined by CONNECT's taxonomy of Aging and Long-Term Care Services (The ElderConnect checklist of primary service categories can be found in Section VII)

CALIFORNIA: Orange County Office on Aging (AAA)

All Orange County based government, non-profit or for-profit organizations that provide or coordinate health, human or community-based services for older adults or persons with disabilities are eligible to be included in the database.

MASSACHUSETTS: Montachusett Home Care Corporation

Local aging I&R provider agency policy:

Resource entries may include but are not limited to: private nonprofit agencies, licensed nursing homes, residential care homes, assisted living facilities, continuing care facilities, hospitals, home health providers, municipal, state and federal agencies and commissions, hotlines, help lines and information lines administered by non profit agencies, support groups, organizations (such as churches and civic groups) that offer a service which is not restricted to their members, advocacy groups that address a specific health or human service concern, businesses offering a service meeting a human service need, professional organizations, funding sources, qualifications of staff.

Examples – Comprehensive or Other Non-Aging Specialized I&R

KENTUCKY: KyCARES (statewide)

KyCARES will strongly consider providers offering services for the following: Basic needs (food, shelter, clothing); Employment; Health (Mental and Physical); Safety; Transportation; Education.

KyCARES accepts providers that offer to individuals or families services in the areas above, or removes barriers to self-sufficiency in these areas. Providers can offer the services directly, give information and referrals to others that offer services, provide funds for services or any combination thereof.

Criteria: Local Needs and Conditions

A review of a geographical area's demographics, including socio-economic factors, weather conditions, local cultural patterns, and probability of disaster events provide the aging I&R/A with some parameters for inclusion of additional resources in its database. For example:

- An area with a large population of ethnically or culturally distinct groups will want to ensure the database contains resources that respond to local needs and reflect their cultures, traditions, languages, and customs.

- A resource database serving an area with a high number of retirees will want to look at the needs for these individual to access private pay services, volunteer and part-time employment opportunities, financial services resources, educational resources and so on. An area that is economically depressed will need a variety of low and no-cost options to address basic needs.

- A rural farming community may have fewer resources that by necessity respond to a large variety of issues over large geographical areas, including some informal resources that are difficult to ascertain without community connections.

- An urban service area will most likely have access to an extensive and more complex network of resources, including I&R resource databases, with finer lines between target populations, service areas, relevance, and responsiveness.

- Extreme weather conditions, such as high or low temperatures, may require such resources as cooling fans, cool places to stay, generators, help with heating costs, etc. Disaster response resources vary depending on local circumstances and needs. Natural and manmade disasters include wildfires, hurricanes, tidal waves, floods, volcanic activity, and terrorist threats.

As mentioned earlier, a statewide aging I&R/A database may need to be more generic in content than that of a local resource database. Cooperative relationships, database development options and technological opportunities can be incorporated to overcome this issue and allow for statewide aging I&R/A databases to include resources that meet local needs and conditions.

As shown in Exhibit 2-5, a common criteria for including entities located outside a geographical service area in the database was that they provide "an essential service not otherwise available" to the target population.

Exhibit 2-5. Services Located Outside a Geographical Area: Inclusion/Exclusion Examples

Examples - Aging I&R/A

CALIFORNIA: Area 1 Area Agency Senior I&A
Inclusion:
- Local Self-Help support Groups
- Regional or national organizations that serve residents of the local area but are located out of local service area

CALIFORNIA: Orange County Office on Aging (AAA)

An organization will not be included in the database under the following circumstances: Located outside of Orange County (unless no other comparable services available in Orange County)

Examples - Comprehensive or Other Non-Aging Specialized I&R

LOUISIANA: 232-HELP/211 Acadiana Resources (Regional 2-1-1)
Specific Inclusions:
- Health and human services programs offered by the state, parish or municipal governments which either have offices in Acadiana or provide services within that area.
- Organizations outside the Acadiana region which provide a service not available locally.

Criteria: Legal Status

Very specific definitions and criteria for inclusion and exclusion can provide community providers and stakeholders with a good understanding of what might be appropriate entities for including in the database. The I&R/A can also use the taxonomy structure or an application process to further complement the criteria and preclude non-service related entities.

Keep in mind that specificity can potentially be a disservice to consumers if the resultant inclusion/exclusion criteria inadvertently reduce access to relevant, essential and needed services. Incorporating some wiggle-room into the policy wording can allow for those entities that provide a needed service but do not fit the normal organizational profile.

Most of the inclusion/exclusion criteria reviewed by the National Aging I&R Support Center use tax status as a primary determiner of inclusion and/or exclusion. The essential types of organizations addressed were: 1) government bodies, 2) nonprofit entities, and 3) for-profit corporations. Decision areas around these three types of organizations, as well as those for less well-defined types of resources, will be examined.

Aging I&R/A resource databases include all or some local, state and national government resources. Some excluded those physically located outside the service area, unless they provide direct service in the defined subject and/or geographical areas. Some excluded elected officials.

One consideration is whether any potentially excluded governmental bodies could be helpful toward supporting consumers to advocate for themselves or others. Another consideration would be whether to include legislative officials and policy updates if the aging I&R/As is part of an organization that provides opportunities for public advocacy. Some I&Rs include nonprofit organizations with government entities. Examples from the field are displayed in Exhibit 2-6.

Exhibit 2-6. Legal Status: Status: Government Resource Inclusion Examples

Examples – Aging I&R/A

CALIFORNIA: Area 1 Agency on Aging Senior I&A

Inclusion: Governmental (public) agencies which provide social, education or health services

Exclusion: Programs where standards of service quality are heavily regulated and for which there exists a governmental entity that adequately provides central referral for the services (for example, nursing homes and board and care homes); Elected governmental officials

CALIFORNIA: Network of Care, Contra Costa County (AAA)

City, county, state, or federal governments that operate health and human service programs in Contra Costa County.

OHIO: District 5 AAA, Inc.

Resource Information Included: Information on programs that are provided by, funded by or licensed by a federal, state or local government agency.

MINNESOTA: MinnesotaHelp.info (SUA)

Government and not-for-profit agencies and programs that provide assistance for the general public. These include federal, state, and municipal governments as well as non-profits designated as 501(c)(3) incorporations.

WASHINGTON: Senior Services of Seattle/King County (local aging I&R/A)

▪ Governmental (public) agencies which provide social, education, or health service.

▪ Elected government officials at the federal, state, and local levels representing the residents of service area.

Examples - Comprehensive or Other Non-Aging Specialized I&R

IDAHO: Idaho CareLine 211

Non-profit 501 (c) (3) tax exempt organizations or government agencies that provide a free, low cost, or sliding-fee scale services (social, educational or health and human service) and elected officials that either have offices in Idaho or provide services within the State of Idaho.

GEORGIA: United Way 2-1-1 of Central Georgia

Health and human service programs offered by state, county or municipal governments which have offices in or serve residents of United Way of Central Georgia's 211 service area.

Inclusion of public/private nonprofit organizations in aging I&R/A resource databases is the norm. Although nonprofit criteria and descriptors usually are more specific than those for government agencies, they still tend to be fairly broad, leaving room for some interpretation. National associations and other nonprofit resources most often fall in this arena. Examples include toll-free numbers and Web sites for chronic disease organizations, caregiver resources, and advocacy groups. Statewide resources and hotlines might also be included, as well as local organizations.

Examples of criteria denoting nonprofit organizations can be seen in Exhibit 2-7.

Exhibit 2-7. Legal Status: Nonprofit Inclusion/Exclusion Examples

Examples – Aging I&R/A

CALIFORNIA: Area 1 Agency on Aging Senior I&A

Inclusion: Non profit agencies which provide community services

CALIFORNIA: Network of Care, Orange County (AAA)

A. All Orange County based non-profit or for-profit organizations that provide or coordinate health, human or community-based services for older adults or persons with disabilities are eligible to be included in the database

B. All eligible organizations must fill out the Application for Inclusion in the Resource Database in its entirety, providing general and detailed information regarding their service, including status as a for-profit or non-profit entity

NORTH CAROLINA: Just1Call (County/Community Aging & Disability I&R)

A. Incorporated as a non-profit (IRS 501(c) 3 status) providing direct health and human services, and meeting all of the following criteria:
  ▪ Has an established address, phone and available contact person.
  ▪ Has been providing services for one year.
  ▪ Is a member of the Better Business Bureau.

B. An incorporated non-profit providing indirect services in one or more of the following areas:
  ▪ Community organization and planning, improvement of standards and services, research and interpretation.
  ▪ Financial support for health and human service agencies.
  ▪ Governmental or civic licensing or endorsing of health and human service organizations.
  ▪ Education and training for social work and related fields.

WASHINGTON: Senior Services of Seattle/King County (local aging I&R/A provider)

▪ Nonprofit agencies which provide community services
▪ Toll-free telephone services or web sites if they offer a social, health, or community service to residents of the service area.

Examples - Comprehensive or Other Non-Aging Specialized I&R

LOUISIANA: 232-HELP/2-1-1 Acadiana Resources (Southwest Louisiana Education & Referral Center –Regional 2-1-1)

Non-profit organizations (classified as 501(c)(3) under the Internal Revenue Code) which are involved with health and human services

WYOMING: Connect Wyoming – Pathways Plus (statewide comprehensive resource database)

▪ Non-profit organizations which provide, coordinate or advocate for health and human services
▪ Non-profit organizations which provide community service opportunities

To verify the exempt legal status of an organization, consult IRS Publication 78, *Cumulative List of Organizations described in Section 170(c) of the Internal Revenue Code of 1986* (organizations eligible to receive tax-deductible charitable contributions). To search Publication 78 online go to *http://apps.irs.gov/app/pub78*.

An electronic version of Publication 78 is available for download at *http://www.irs.gov/charities/article/0,,id=96136,00.html.*

The IRS notes that Publication 78 is not all-inclusive. If the tax-exempt you are looking for is not listed, you can request to see an organization's IRS letter recognizing it as tax-exempt or call IRS toll-free 1 (877) 829-5500. IRS will verify tax-exempt status.

When it comes to determining whether to include private for-profit corporations, there is a wide variance in approaches. Once more the question can be posed whether excluding for-profit corporations will reduce consumers' access to essential services. Most policies reviewed included healthcare organizations and many considered the availability of comparable services provided by nonprofit or government resources.

Several policies took into account whether or not corporations provided low or no-cost community services. In many instances, private practitioners were not included; however, in just as many, they were included on some level, many times with contingencies.

For example, some allowed for private practitioners if they provided an essential service not otherwise available. Other inclusion criteria allowed for professional associations that provided referral services to private practitioners. In the case of Aging & Disability Resources Centers, private-pay options that provided services parallel to Older American Act and state and/or Medicaid-funded home & community-based services were also included.

Sustainability of a quality, up-to-date and relevant database can be a challenging effort for many aging I&R/As. Some organizations have used the opportunity to include for-profit entities as a way of enhancing the database itself and/or creating printed directories. In exchange for fees or donations, such organizations are sometimes given special privileges.

Examples include Web site links; sponsorship recognition; and access to certain database software components, such as tools for case management; volunteer and donor opportunity; shelter management; and internal or community calendars. See Exhibit 2-8 for sample for-profit inclusion/exclusion criteria.

Exhibit 2-8. Legal Status: For Profit Inclusion/Exclusion Examples

Examples – Aging I&R/A

CALIFORNIA: Area 1 Area Agency

Inclusion:
For-Profit organizations offering health and human services not adequately provided by the non-profit sector, or offering services parallel to non-profit services

Exclusion:
- Private, or commercial, for-profit organizations that do not meet the inclusion criteria
- Individual In-Home workers (child care, respite, health workers)
- School programs that are not public or non-profit
- Trade and professional organizations
- Organizations that provide free services when their primary purpose is to market the organizations main business

CALIFORNIA: Network of Care - PASSAGES Adult Resource Center (AAA Serving seniors, adults with physical disabilities and caregivers)

For-profit entities are included in the Refer 2 database and directory when:

1. No non-profit agency providing a designated, commonly requested service is available in Butte County. Examples of such services include: Food delivery services for adults under the age of 60
2. 24-hour on-call notaries; Residential care facilities; Skilled nursing facilities
3. They offer services to clients served by PASSAGES Adult Resource Center, who do not meet the eligibility requirements (age, income, place of residence, etc.) of non-profit alternatives. Examples of this type of entity include: Private conservator; Senior landlords seeking legal services.
4. No alternative for-profit or non-profit agency providing a designated, commonly requested service is available in Butte County. Examples of such services include: Non-subsidized taxi services in rural areas.
5. Specific services provided by a for-profit entity are frequently paid for by a governmental agency. Examples of such services include: Home health services paid for by Medicare; Subsidized housing in privately owned rental; Homemaker service grant through a private home health agency; Medication management program through private home health agency.
6. Specific services provided by a for-profit entity are frequently paid for by a non-governmental agency. Examples of such services include: Low-income medication assistance programs through pharmaceutical companies; Holiday giving programs sponsored by for-profit retail establishments.

HAWAII: Hawaii Executive Office on Aging (SUA)

As a general rule, public or nonprofit agencies will be included in the database since information and referral/assistance services are provided as a public service. For-profit agencies that provide a community service may also be included if:

(a) their service(s) is not available in the public or nonprofit sector; or
(b) their service(s) is not adequately provided in the public or nonprofit sector; and
(c) information about their service(s) is a demonstrated needed in the community.

Exhibit 2-8. Legal Status: For Profit Inclusion/Exclusion Examples (Cont'd)

Examples – Aging I&R/A

HAWAII (Cont'd)

After these basic considerations regarding public purpose and service have been determined, providers may be listed in the database if they:

- Provide services to the community in at least one of the categories defined in the taxonomy of aging and long term care services;
- Are certified, licensed, or accredited by the appropriate levels of government as necessary;
- Are in compliance with any established applicable local, state, or federal laws and regulations as applicable;
- Demonstrate provision of service for at least one year, show evidence of an established service site, show evidence of community involvement in or oversight of the service (e.g., Board of Directors, Letters of Reference, etc.), when no licensing, certification or regulations is required of the provider
- Supply requested database information and updates in an accurate and timely manner.

MINNESOTA: MinnesotaHelp.Info (SUA)

- Housing and facility establishments, medical related agencies, home care providers, whether for-profit, commercial, private, governmental, or not-for-profit, not under investigation by regulatory entities.
- Professional organizations and trade associations that do customized referral to private persons will be included. These include the Bar Association, the various State Boards that license professionals (Medical Practice, Psychologists, Social Workers, Nurses, etc.), and other agencies that provide listings of private providers.
- Agencies and providers certified to accept Medicaid (Medical Assistance) Medicare or any Medicaid waiver program including for-profit, commercial or private organizations.
- Agencies and programs that are under a county contract to provide services.
- National agencies and trade associations
- Agencies and Providers who provide a fee for services or case management approaches to service delivery that address the community social welfare, long-term care or chronic care needs of the citizens of Minnesota.
- For-profit, commercial, or private organizations that don't fall into one of the categories above:
- Related to maintaining someone in their home and independent as commonly understood;
- Lack of comparable services from not-for-profit;
- Degree of need for the services.

NEW MEXICO: Aging & Long Term Care Department (SUA/ADRC grantee)

In the case of for-profit businesses, you will be listed if you provide a unique service that helps seniors and people with disabilities maintain their independence. For example, all grocery stores in a community will not be listed, but all grocery stores that deliver groceries to homes will be listed.

Exhibit 2-8. Legal Status: For Profit Inclusion/Exclusion Examples (Cont'd)

Examples – Aging I&R/A

Washington - Senior Services of Seattle/King County (local aging I&R/A provider)

- For-profit, proprietary human service agencies which are providing services not adequately provided by the nonprofit sector
- For-profit organizations, offering services parallel to a nonprofit services, to which clients are referred and fees paid by a government agency (i.e. proprietary agencies offering homemaking services to qualified clients.)
- For-profit, proprietary businesses offering a unique or specialized service of interest to the target population but not provided by the nonprofit sector (i.e., in-home hair care or specialty clothing for adults with disabilities.)

Examples - Comprehensive or Other Non-Aging Specialized I&R

LOUISIANA: 232-HELP/2-1-1 Acadiana Resources (Regional 2-1-1)

Specific Inclusions:
- For-profit and proprietary agencies if they offer a service not adequately provided by other resource listings; or if they offer scholarships, reduced fees or sliding fee scales and accept Medicare or Medicaid
- Professional organizations related to community service

NEW YORK: Central Referral Services, Inc. (2-1-1, includes AAA info from 1 county)

For-profit organizations may be included if they meet a community need where insufficient not-for-profit or government services exist to meet the need and if they are licensed or certified by respective licensing entities.

NORTH CAROLINA: United Way 2-1-1 of Central Carolinas, Inc.

A for-profit organization may be included if it meets *all* of the following criteria:

- Provides a specialized service for senior citizens or disabled individuals that enable these individuals to accomplish "Activities of Daily Living," as defined by the North Carolina Medical Assistance Program to include hygiene/bathing/grooming, dressing, ambulation/mobility/transferring, eating and toileting;
- Has an established address, phone, and available contact person;
- Is licensed/accredited, or a Medicare/Medicaid approved provider, where applicable;
- Has been providing services for one year –or– is a member of the Better Business Bureau.

WYOMING: Connect Wyoming – Pathways Plus (statewide comprehensive resource database)

- For-profit organizations that accept Medicaid, Medicare, or provide free or low-cost services;
- For-profit organizations that provide a service not met by public or non-profit agencies.

Community organizations and services exist in every community that do not fit neatly into a nonprofit or for profit business tax status designation. These types of resources offer another set of opportunities for decisions about the nature of the resource database.

Policies usually categorically exclude groups that only provide services to their own members. Some of these groups do offer services to the public at large using private and/or public funds. In fact, many faith-based and issue-oriented organizations have distinct branches that provide non-denominational or non-issue-related social and health services and have a long history of quality service provision. Proselytizing or distributing subjective information to non-member participants may need to be addressed as an issue area for inclusion eligibility.

Exhibit 2-9. Members-Only Services: Inclusion/Exclusion Examples

Examples – Aging I&R/A

CALIFORNIA: Area 1 Area Agency Senior I&A

Exclusion: Services which are only available to members of a certain group or affiliation

OHIO: Info Line of Summit County I&R, Senior I&R, and Emergency Services (Aging I&R/A Provider)

Agencies excluded from the resource file: Services available only to members of a certain group or club (i.e. counseling available to a church's parishioners only)

WASHINGTON: Senior Services of Seattle-King County (local I&R/A)

Agencies/programs NOT eligible for inclusion in the I&A resource database: Services which are available only to members of a certain group or affiliation (i.e., Counseling available to a church's parishioners only).

Examples - Comprehensive or Other Non-Aging Specialized I&R

LOUISIANA: 232-HELP/211 Acadiana Resources (Regional 2-1-1)

Specific inclusions: Organizations such as churches and social clubs which offer a service to the community at large, not just their own *members.*

WYOMING: Connect Wyoming – Pathways Plus (statewide resource database)

Ineligibility for inclusion into Pathways Plus: Organizations that offer a service only to their members.

Local grassroots efforts often result in the formation of unincorporated entities, such as support groups and temporary entities that meet immediate local needs. Examples include: caregiver, grandparents raising grandchildren, grief, and Alzheimer's support groups organized by community members; community volunteer efforts to assist older adults with home/yard improvement, special trips and other support activities; a newly formed group of young adults with disabilities that meet and plan recreational activities; and a local effort to address a recent disaster situation.

Whether or not unincorporated entities are included in an aging I&R/A database depend on several factors. Manikowski suggests reviewing whether or not the database resource specialist can maintain reliable data on an entity in question. The following are some questions to ask:

- Does the entity have a stable contact person and back up person who can update their service information?

- Is there a fixed mailing address to contact the organization, whether or not the contact person changes?

- Is there an affiliated state, regional, or national organization that maintains a database of local contact numbers and addresses?

Exhibit 2-10 shows examples of how different inclusion/exclusion policies address the issue of temporary organizations.

In terms of members-only services, faith-based services, and unincorporated entities, the over-riding concern will be whether the resource database owner has adequate resources to appropriately maintain and update the information.

Having a large number of resources is less important than having those that are both accurate and relevant. Multiple referral options that serve only a very limited population may actually overburden I&R specialists and add stress to a consumer's decision-making and linking process.

When resources are in question, whether an entity being considered provides an essential service to the target population(s) needs to be asked in combination with whether there are similar programs providing the same service to all potentially eligible persons in an identified service area.

Criteria: National and State Toll-free Numbers and Web Sites

Another area for consideration is the wide range of national and state toll-free numbers and Web sites that link consumers to information, assistance, and consultation services. Specific topics of interest include chronic disease management, retirement and long-term care planning, caregiving, Social Security, Railroad retirement benefits, Medicare, legal services, assistive technology, specific disability-related services and advocacy, to name just a few. These types of resources, of course, require ongoing verification of existence and services provided, just like any other resource.

Many agree that increasing numbers of seniors and their caregivers will use online resources, *if* they are available. According to recent surveys conducted for the Pew Internet and American Life Project:

> 25% of Americans 65 and older use the Internet. The percent of seniors who go online has jumped by 67% between 2000 and 2004. In a May-June 2004 survey, 25% of Americans age 65 or older reported having access to the Internet, up from 15% in 2000. That translates to about 9 million Americans age 65 or older who use the Internet. By contrast, 60% of Americans age 50-64, 74% of 30-49 year-olds, and 78% of 18-29 year-olds currently go online. . . . Communication and information searches attract wired seniors. There has been sharp growth in the number doing key Internet activities such as health searches, e-shopping, and online banking.

The HHS Information and Hotline Directory *www.hhs.gov/about/referlst.html* has a very comprehensive list of Web sites and toll-free numbers. A listing of current health and healthcare-related national toll-free numbers can be found on the National Health Information Center Web site at *www.health.gov/NHIC/Pubs/tollfree.htm.*

Some policies, as shown in Exhibit 2-11, specify that toll-free numbers and Web sites that serve the target population in the service area be included in the database. Exhibit 2-12 lists examples of national toll-free numbers and/or Web sites for consideration in aging I&R/A resource databases.

There will also be state and region-specific toll-free numbers and Web

sites to consider, such as: statewide legal services; State Health Insurance Assistance Programs (SHIPs); State Long-term Care Ombudsman; State Unit on Aging; Medicaid consumer assistance lines and transportation brokers; State Attorney General; State Insurance Commissioner; Elder Abuse Hotlines; and general or specialized I&R resources.

Many older adults do not use the Internet and therefore Web site addresses cannot entirely replace toll-free and local phone numbers. Considering the populations served by aging I&R/As, access to service and program information will most likely require alternate avenues, including through the provision of Web site links, phone numbers, education for self empowerment and self advocacy, as well as one-on-one assistance and consumer advocacy.

Exhibit 2-11. Toll-Free Numbers and Web Site Inclusion Examples

Examples – Aging I&R/A

CALIFORNIA: Area 1 Area Agency

▪ Inclusion: Local, regional or national Toll-Free telephone services if they offer a social health or community service meeting the first two priorities

WASHINGTON: Senior Services of Seattle-King County (Local aging I&R/A provider)

▪ Agencies/Programs Eligible for Inclusion: Toll-free telephone services or Web sites if they offer a social, health, or community service to residents of the service area.

Examples – Comprehensive or other Specialized I&R

KENTUCKY: KyCARES Statewide government-funded resource database

▪ Providers are businesses, hotlines or Web sites that provide services, information or financial assistance

LOUISIANA: 232-HELP/211-Regional 211

▪ Specific Inclusions: 800 lines if they offer a social or community service

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Exhibit 2-12. National Toll-Free Numbers and Web Sites

- Eldercare Locator *www.eldercare.gov* Toll-free: 1-800-677-1116, M-F, 9 AM–8 PM ET
- American Health Assistance Foundation *www.ahaf.org* Toll-free: 1-800-437-2423
- Alzheimer's Association www.alz.org Toll-free Contact Center: 1-800-272-3900, 24 hours/day
- Federal Relay Service: *www.fts.gsa.gov/frs* Toll-free: 1-800-877-8339 (TDD/ASCII/Voice); Spanish speaking operator 1-800-845-6136
- Cancer Information Service *www.cancer.gov* Toll-free: 1-800-4 CANCER or 800-332-8615 (TTY)
- HHS Information and Hotline Directory *www.hhs.gov/about/referlst.html*
- HUD Housing Counseling & Referral: *www.hud.gov/buying/rvrsmort.cfm* Toll-free: 1-800-569-4287 for general housing concerns; to report fraud or abuse in the reverse mortgage program
- Kidney and Urology Foundation of America *www.kidneyurology.org* Toll-free: 1-800-633-6628.
- Senior Legal Hotline Directory (AoA) *www.aoa.gov/eldfam/elder_rights/legal_assistance/SRdirclient.pdf*
- 1-800-MEDICARE *www.medicare.gov* Toll-free: 1-800-633-4227) or 1-877-486-2048 (TTY/TDD)
- Medicare Fraud & Abuse / Office of Inspector General *www.oig.hhs.gov* Toll-free: 1-800-223-8164
- National Academy of Elder Law Attorneys *www.naela.com*
- National Accessible Travelers' Database *www.projectaction.org* Toll-free: 1-800-659-6428 if more specific information is needed
- National Association of Protection and Advocacy Systems *www.napas.org*
- National Child Care Information Center *http://nccic.acf.hhs.gov* Toll-free: 800-616-2242
- National Citizen Information Center *www.pueblo.gsa.gov* Toll-free: 1-800-FED-INFO (1-800-333-4636)
- National Domestic Violence Hotline *www.ndvh.org* Toll-free: 1-800-799-SAFE (7233) or 800-787-3244 (TTY).
- National Eye Institute *www.nei.nih.gov*
- National Institute on Aging Information Center *www.niapublications.org* Toll-free 1-800- 222-2225 or 1-800-222-4225 (TTY), 8:30 AM–5 PM
- National Institute on Deafness and Other Communication Disorders *www.nidcd.nih.gov* Toll-free: 800-241-1044
- National Energy Assistance and Referral Toll-free: 1-866-674-6327; E-mail *energyassistance@ncat.org* for information on Low Income Home Energy Assistance Program (LIHEAP)
- Social Security *www.ssa.gov* 1-800-772-1213 or 1-800-325-0778 (TTY) M-F, 7 AM–7 PM ET
- State Food Stamp Information/Hotline Numbers *www.fns.usda.gov/fsp/contact_info/hotlines.htm*
- Toll-free Federal Transit Administration (FTA) Americans with Disabilities Act (ADA) Assistance Line *www.fta.dot.gov/library/social/wwwline.htm* Toll-free: 1-888-446-4511
- U.S. Department of Health and Human Services, Office of Inspector General Hotline *http://oig.hhs.gov/hotline.html* Toll-free: 1-800-HHS-TIPS (1-800-447-8477)
- US Railroad Retirement Board Help-Line *www.rrb.gov/field.html* Toll-free: 1-800-808-0772

Criteria: Funding Source

As mentioned earlier, a few aging I&R/As restrict their resource database to services funded through the State and Area Agencies on Aging (e.g., Older American Act-funded services and Title XIX Medicaid home and community based waiver services). This approach offers a clear cut method of deciding what or what not to include, but it may inadvertently reduce the usefulness of the database for older adults, persons with disabilities, and their caregivers — each potential consumer has his or her own unique needs as a result of distinct circumstances. It can also restrict ease of enlarging the scope of the database if and when funding opportunities and resultant target population changes occur.

Several policies broaden inclusion criteria to include Medicaid service providers and/or those that accept Medicare. Others also include other publicly funded or community-funded entities offering service(s) for free, reduced-fee, donation or sliding fee scales.

8 Considerations for Possible Exclusion

Criteria: Staff Size

Some Inclusion/Exclusion policies exclude resources that do not have at minimum one (1) paid full time employee. The purpose of this criterion is generally to reduce the challenges associated with non-reliable contact options for database updates.

If this is a criterion important to managing the database, it might also make sense to include some level of flexibility, either in the criterion or the disclaimer, so that essential services are not automatically excluded by not meeting staff requirements. None of the policies reviewed addressed this issue in their criteria.

Criteria: Political and Issue-Oriented Groups

Discussions around whether or not to include political and issue oriented groups can become controversial. A review of an organization's mission, the needs of the target population(s), and requirements of any and all funding sources may provide guidance.

If one purpose of the aging I&R/A program is to provide opportunities for self-advocacy and efficacy, it makes sense to provide avenues toward that purpose. Several political and issue-oriented groups provide services to individuals affected by the issue. State and area agencies on aging are no exception. Advocacy is mandated in the Older Americans Act.

Another example of issue-related advocacy as a service is found in the national and state Protection and Advocacy (P&As) Systems and Client Assistance Programs (CAPs). They comprise a nationwide network of congressionally mandated, legally based disability rights agencies.

As part of their advocacy role most area agencies on aging provide the community with information on how to contact elected officials. The resource database may be an opportunity to provide that service to consumers. In the larger universe of I&R, some inclusion/exclusion policies categorically exclude all political and issue oriented groups; others maintain a

balance between the various political points of view.

Political issues impact the daily lives of many older adults, persons with disabilities and caregivers. Non-partisan educational resources and volunteer opportunities can offer consumers access to interactions on issues in which they may want to participate.

Exhibit 2-13. Political and Issue-Oriented Inclusion/Exclusion Examples

Examples – Aging I&R/A

CALIFORNIA: Area 1 Agency on Aging Senior I&A
- Inclusion: Community and civic advocacy groups
- Exclusion: Elected governmental officials

NORTH CAROLINA: Southwest Commission AAA

The following listing *may be included* in the Region-A Human Services Directory:
- Professional organizations
- Advocacy groups
- Support/self-help groups
- Elected or appointed public/government officials

WASHINGTON: Seattle Services of Seattle-King County (Local aging I&R/A Provider)

Agencies/organizations *eligible for inclusion*:
Elected government officials at the federal, state and local levels representing the residents of the service area

Examples – Comprehensive and/or Non-Aging Specialized I&R

LOUISIANA: 232-HELP/211-Regional 211

Specific Inclusions: Advocacy groups related to health and human service issues

WYOMING: Connect Wyoming – Pathways Plus (statewide comprehensive resource database)

Eligibility for Inclusion into Pathways Plus:
- Non-profit organizations which provide, coordinate, or advocate for health and human services
- Professional organizations that provide a human service
- Advocacy groups related to health and human service issues
- Civic and business organizations as appropriate to our mission

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Criteria: Organizational Viability

Maintaining an accurate and up-to-date resource database can be challenging if the organizations entered into the database frequently change. Some recently established businesses cannot build the clientele, resources, or reputation first envisioned and, therefore, lose viability.

To reduce the impact of changing businesses on the database specialist staff, a policy may require that an entity be established as a business for a minimum amount of time (six-months to one year) before being considered for inclusion.

Another strategy is to require the submission of letters of reference. In the case of one comprehensive I&R, the policy delineated use of standards, length of time in business, as well as a validation process undertaken before an organization could be considered for inclusion. A crisis service in Maine notes that more seasonal services not in the printed directory may be available by calling the organization.

Exhibit 2-14. Political and Issue-Oriented Inclusion/Exclusion Examples

Examples – Aging I&R/A

CALIFORNIA A1AA (AAA)

Exclusion: Agencies or organizations that have been in business less than six months

HAWAII: Hawaii Executive Office on Aging (SUA)

After. . . basic considerations. . ., providers may be listed in the database if they: Demonstrate provision of service for at least one year, show evidence of an established service site, show evidence of community involvement in or oversight of the service (e.g., Board of Directors, Letters of Reference, etc.), when no licensing, certification or regulations is required of the provider.

NORTH CAROLINA: Just1Call (County/Community Aging & Disability I&R)

May be included in Just1Call's database if it falls into one of the following categories:

A. Incorporated as a non-profit (IRS 501(c)3 status) providing direct health and human services, and meeting all of the following criteria:

- Has an established address, phone and available contact person.
- Has been providing services for one year –or– is a member of the Better Business Bureau.

B. A for-profit organization may be included if it meets *all* of the following criteria:

- Provides a specialized service for senior citizens or disabled individuals that enable these individuals to accomplish "Activities of Daily Living," as defined by the North Carolina Medical Assistance Program to include hygiene/bathing/grooming, dressing, ambulation/mobility/transferring, eating and toileting.
- Has an established address, phone and available contact person.
- Is licensed/accredited, or a Medicare/Medicaid approved provider where applicable.
- Has been providing services for one year –or– is a member of the Better Business Bureau.

WASHINGTON: Senior Services of Seattle-King County (local I&R/A provider)

Agencies/programs NOT eligible for inclusion: Agencies or organizations [that] have been in existence less than six months.

Examples – Comprehensive or Other Non-Aging Specialized I&R

CALIFORNIA: HelpCentral.org – Butte County I&R

Viability/Stability Test: In most cases, organizations should also meet both of the following criteria:

1. The organization has an office location (not just a contact number).
2. The organization has been in existence for at least year, or if less than year, demonstrate that it has adequate fiscal and other resources to give it a reasonable chance of viability.

Exhibit 2-14. Political and Issue-Oriented Inclusion/Exclusion Examples (Cont'd)

Examples – Comprehensive or Other Non-Aging Specialized I&R

MAINE: Resource Link – Cumberland County Crisis Line/ I&R (also available statewide)
The directory does not include information about time-limited, confidential, or informally organized services, although such information may be available from Ingraham's telephone caseworkers at 774-HELP. For example, Ingraham caseworkers may refer callers to support groups, holiday resources, or tax filing assistance sites which are, by their nature, always changing and therefore not suitable for inclusion.

NEW YORK: Central Referral Service, Inc. (Erie County I&R; community, government, corporate funding)
Inclusion Criteria:
▪ Organizations shall have been in existence for six months or are affiliated with another organization that has been in existence for at least one year.
▪ Organizations shall have a demonstrated ability to provide the service they say they provide, as indicated by information from clients or affiliated professionals.

OHIO: InfoLine of Summit County
Availability of Standards
Where licensing standards for a given field of service are known to exist, only those agencies that meet these standards may be included in the file. Agencies will be requested to send copies of their licensing with their application for inclusion in the resource listing.

Non-Availability of Standards
Where licensing standards are not known to exist, Info Line will use the following guidelines to establish the validity of any agency's service.
A. Evidence of an established service site
B. Demonstrated provision of service for a period of at least six months (thereby excluding agencies of a temporary nature, i.e. support groups for Desert Storm, natural disaster support groups, etc. These would be included in a temporary file).

Validation Procedures
Info Line will use one or more of the following means in the validation process:
A. Site visit and face-to-face interview.
B. References from clients or affiliated professionals.
C. Consultation with other agencies in the same field of service or geographic proximity.
D. Check with local law enforcement and/or consumer complaints agencies.

Criteria: Patterns of Complaints, License Revocations, and Penalties

Most policies that were reviewed addressed exclusion criteria for entities whose service provision had been determined poor or inadequate. They varied from those that allowed for exclusion on the basis of complaints to those that factored in licensure status.

Due to the contentious nature of these types of decisions, it may be helpful to obtain legal advice when drafting your policy. Testing the policy with an eye towards objectivity and fairness may reduce the risk for grievances and legal suits.

Inclusion of and referrals to professional associations and licensing entities in the resource database can further minimize some of these issues. Bear in mind that professional associations are created to service their members. To keep their databases current, some aging I&R/As have set up agreements with regulatory agencies to inform the database manager of any changes in licensure or legal status for residential and home and community based care service providers.

A word of caution: This activity should not in any way be construed as guaranteeing, overseeing, or recommending one or more service, as it might open the aging I&R/A to complaints of liability if a consumer experienced harm as a result of using the service(s).

Beyond the inclusion/exclusion criteria, some of the policies reviewed set out a complaint procedure to officially request that a particular resource be excluded from the database. See Exhibit 2-15 for criteria for exclusion examples.

Exhibit 2-15. Examples for Exclusion: Patterns of Complaints, Licence Revocations, or Penalties

Examples – Aging I&R

ALABAMA: ElderConnect Alabama (SUA)

Providers will be listed in the CONNECT database if they: Are certified or licensed by the appropriate levels of government where provisions for such certification or licensing exist.

Providers will be removed from the CONNECT database if they:

▪ Have their certification or license revoked by a level of government;

▪ Have their certification and/or organizational membership revoked by a recognized group of peers who set professional standards;

▪ Exhibit a pattern of failing to respond in a timely and satisfactory manner to client complaints reported to and identified by Alabama Aging Network Resource Specialists.

CALIFORNIA: Area 1 Agency on Aging Senior I&A

Exclusion: Organizations with substantial documented complaints.

HAWAII: Executive Office on Aging (SUA)

Exclusion criteria: Providers will be excluded from the database if they:

▪ Have their certification or license suspended or revoked by a level of government;

▪ Have their certification and/or organizational membership revoked by a recognized group of peers who set professional standards;

▪ Exhibit a pattern of failing to respond in a timely and satisfactory manner to client complaints, which have been reported to and identified by the EOA or AAAs and/or have substantive and unresolved complaints lodged against them via legal actions or other processes.

Examples of Comprehensive or Non-Aging Specialized I&R

CONNECTICUT: 2-1-1 Infoline (statewide 2-1-1)

Exclusion: UWC reserves the right to refuse to list or to discontinue listings for organizations that have had serious complaints lodged against them with any regulatory body, with other organizations in the database providing similar services, or with UWC itself.

Criteria: Legal Violations and Misrepresentation of Program, Organization, or Services

A clear criterion for determining exclusion is when an entity violates the law and the infraction becomes part of the public record. Several policies that were reviewed addressed this potential problem.

Misrepresentation of what an organization is and what programs or services it provides may well fall under the category of legal violations. A misrepresentation becomes fraud when made by one contract party to another party to the same contract. For example, it might apply if one pays for services, contracts for services or, even possibly, applies and is accepted for services.

Deceptive business practices can result in harm to vulnerable adults. Clear examples of fraudulent practices might include a personal care agency billing for services not rendered; a mortgage company misrepresenting loan terms being offered; a healthcare provider double billing for services or accepting kickbacks from companies providing its supplies or materials.

Without understanding the impact of their actions, staff or business owners might misrepresent their organization or services while attempting to impress others, solicit donations or attract customers. These situations are less clear and may not be legally fraudulent but can potentially result in complaints or legal suits. During a period when misrepresentation is suspected but not yet proven, good inclusion/exclusion criteria will provide staff with appropriate decision support.

Examples of criteria for inclusion/exclusion are shown in Exhibit 2-16.

Exhibit 2-16. Legal Violations and Misrepresentation of Program, Organization, or Services: Inclusion/Exclusion Examples

Examples – Aging I&R

ALABAMA: ElderConnect Alabama (SUA)

Providers will be listed in the CONNECT database if they: Are in compliance with any established, applicable local, state, or federal laws and regulations.

Providers will be removed from the CONNECT database if they:
- Have their certification or license revoked by a level of government;
- Have their certification and/or organizational membership revoked by a recognized group of peers who set professional standards.

CALIFORNIA: Area 1 Agency on Aging Senior I&A

Exclusion: Any organization which promotes or delivers illegal services, misrepresents themselves.

CALIFORNIA: Orange County Office on Aging (AAA)

- An organization will not be included in the database under the following circumstances:
- Provides an illegal service
- Services cannot be verified
- Services are misrepresented

MINNESOTA: MinnesotaHelp.Info (SUA)

Exclusion: Agencies that have been found in violation of municipal, state, or federal laws or regulations and have been excluded from providing service under the requisite licensure.

MASSACHUSETTS: Montachusett Home Care Corporation (AAA)

Exclusion information: MHCC may choose to exclude any resource it believes has misrepresented itself or does not serve to benefit our population. . . .

NORTH CAROLINA: North Carolina Region A (AAA)

The following listings will not be included in the Region A Human Services Directory:
- Illegal services
- Agencies/organizations that misrepresent their services in any way

HAWAII: Executive Office on Aging (SUA)

Exclusion criteria: Providers will be excluded from the database if they: Misrepresent their organization or its actions or are engaged in the practice of any unlawful actions.

WASHINGTON: Senior Services of Seattle-King County (local I&R/A provider)

Agencies/programs NOT eligible for inclusion: Any organization which promotes or delivers illegal services.

> **Exhibit 2-16. Legal Violations and Misrepresentation of Program, Organization, or Services: Inclusion/Exclusion Examples (Cont'd)**
>
> *Examples – Comprehensive or Non-Aging Specialized I&R*
>
> **KENTUCKY: KyCARES** (Statewide government-sponsored resource database)
> KyCARES will not consider providers that promote pornography, violence, illegal activities, or otherwise offer material that is patently offensive to general sensibilities.
>
> **NEW YORK: Central Referral Service, Inc**. (Erie County I&R – community, government, corporate funding)
> *Exclusion criteria:*
> - Any agency that consistently claims that it performs certain functions or is open certain hours and is not, will be reviewed and possibly deleted from the database.
> - Any agency that provides a service that is characterized as illegal in nature.
>
> **WYOMING: Connect Wyoming – Pathways Plus** (statewide comprehensive resource database)
> *Ineligibility for Inclusion into Pathways Plus:*
> - Agencies and programs that misrepresent their services in some way
> - Agencies and programs that violate federal, state, or local laws

Criteria: Anti-Discrimination Policy

Aging I&R/As receive funds from a variety of sources. Contractual agreements with those funding sources can provide a framework for determining anti-discrimination policies for inclusion and exclusion in regard to resource databases.

If the aging I&R/A is part of a larger agency or other entity, there is most likely a policy already in place. Publishing the terminology as part of the inclusion/exclusion criteria will help to clarify the policy for community partners. If the resource database is a shared initiative, representatives will need to agree on wording that satisfies all. In reviewing aging I&R/A's criteria, "non-discrimination" was most often found to be a criterion for inclusion, rather than for exclusion.

Exhibit 2-17. Discrimination: Inclusion/Exclusion Examples

Examples – Aging I&R

ALABAMA: ElderConnect Alabama (SUA)

Providers will be listed in the CONNECT database if they: Provide services without regard to race, color, religion, or national origin.

CALIFORNIA: Area 1 Agency on Aging Senior I&A

Exclusion: Organizations that deny service based on prejudice or discrimination.

CALIFORNIA: Orange County Office on Aging (AAA)

An organization will not be included in the database under the following circumstances: Denies service based on color, race, religion, gender, sexual orientation, ancestry, nationality or any other basis not permitted by law or whose services are divisive or discriminatory.

MINNESOTA: MinnesotaHelp.Info (SUA)

Exclusion: Any agency that knowingly or unknowingly discriminates or denies services based on age, gender, race, religion, disability, or sexual orientation as covered in the Minnesota Human Rights Act and enforced by the Minnesota Department of Human Rights.

NORTH CAROLINA: North Carolina Region A (AAA)

The following listings will not be included in the Region A Human Services Directory: Organizations and/or agencies which deny service or membership on the basis of race, color, religion, national origin, disability or gender (this is meant to exclude those organizations that discriminate – not those agencies that serve target populations).

Examples – Comprehensive or Non-Aging Specialized I&R

OHIO: InfoLine of Summit County
Agencies Excluded from the Resource File: Illegal services; including agencies which deny service on the basis of color, race, sexual orientation, etc.

WYOMING: Connect Wyoming – Pathways Plus (statewide comprehensive resource database)

Ineligibility for Inclusion into Pathways Plus: Agencies and programs that deny services on the basis of color, disability, religion, sexual orientation, race, ancestry, or nationality.

9 Resource Database Updates

Most database managers have spent many tedious hours contacting organizations multiple times and in a myriad of ways to elicit responses to requests for updates. Returning to the idea that inclusion is a privilege rather than a right, a clear requirement for providing updates may make sense to database owners and managers as a means toward increased efficiency.

Exhibit 2-18 on the next page highlights some examples of how updates are addressed in inclusion/exclusion criteria and policies. Examples of criteria vary from being quite strict to more lenient. One shows a statement to be signed.

Exhibit 2-18. Responding to Requests for Database Updates as a Criterion for Inclusion or Exclusion

Examples – Aging I&R

ALABAMA: ElderConnect Alabama (SUA)

Providers will be removed from the CONNECT database if they: Neglect to supply information and other updates in an accurate and/or timely manner

CALIFORNIA: Area 1 Agency on Aging Senior I&A

Exclusion: Any organization that fails to respond to updating requests/contacts

CALIFORNIA: Orange County Office on Aging (AAA)

A. The information will be updated formally on an annual basis by sending out a form to the resource with the information we currently have and a request to make any changes and return (if none, the current information will remain);

B. The changes will be made into the Refer database and, if appropriate, posted onto the website.

Examples – Comprehensive or Non-Aging Specialized I&R

NORTH CAROLINA: United Way 2-1-1

Signed Statement: I certify that the information provided is true and accurate to the best of my knowledge. I understand that United Way 2-1-1does not guarantee inclusion in its health and human services database and listing of agencies and programs is based on established inclusion criteria. I understand that this information may be provided to individuals and published in a variety of formats, and that listing or publication of information does not guarantee referrals for services. I also agree to inform United Way 2-1-1of any agency or program changes or discrepancies.

NEW YORK: Central Referral Service, Inc. (Erie County I&R ; community, government, corporate funding)

Methodology:

- All information will be validated at least annually.
- The name and title of person verifying information from each agency will be noted.
- Inclusion/exclusion policy will be reviewed, at a minimum, every three years.
- Returned and approved agency profiles will be kept or stored for a minimum of three years.

10 Consumer Privacy Notices

To ensure the privacy of consumers, several inclusion/exclusion policies and web-based resource directories without policies detail specific protections. Even if an inclusion/exclusion policy exists, privacy notices may be developed separately.

In reviewing current criteria, different types of privacy protections were indicated under various topic headings. Examples include: Consumer confidentiality, Health Insurance Portability and Accountability Act (HIPAA), spyware, cookies, security, and I&R follow-up activities. Some were generic to the whole I&R program and others refer only to a specific component of the program or Web site wherein personal information is shared. For example, Infoline, Inc. of Summit County, Ohio, a comprehensive I&R organization that also provides aging I&R/A services, has a HIPPA privacy notice specific to its Telephone Reassurance Service.

Two examples of privacy notices, as shown in Exhibit 2-19, were found that were included as part of an organization's inclusion/exclusion criteria.

Exhibit 2-19. Inclusion/Exclusion: Examples of Consumer Privacy Statements

Examples – Comprehensive or Non-Aging Specialized I&R

IDAHO: Idaho CareLine (2-1-1)

Our Commitment to Your Privacy: The Idaho CareLine website is administered by the Idaho Department of Health and Welfare and is committed to safeguarding your privacy online. We do not collect personal information about our consumers from the Idaho Careline web site. Link here to the full Idaho Department of Health and Welfare privacy policy or to the Access Idaho's privacy policy, which all State government agencies adhere to.

KENTUCKY: KyCARES.net

Privacy Statement: KyCARES.net never asks for personal information from a user if the user just wants to search for Providers or Tip Sheets. KyCARES.net does request that a person submitting information on a new or existing provider submit their name and email address or telephone number. This will help facilitate verification of the submitted information with the agency. This information is never given out to any outside individual or agency other than the provider on which the user submitted new information. KyCARES.net does collect anonymous usage statistics for internal usage only.

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11 Complaint/Grievance Procedures

Consumer feedback – positive or negative, is essential to assuring quality I&R/A service. The feedback may indicate that changes are needed in the policy if essential needs of the community are not being served.

Exhibit 2-20 summarizes key written complaint procedures. For examples of inclusion/exclusion criteria see the chart that follows (Exhibit 2-21.) If potential grounds for exclusion/removal from the resource database are not evident in some of the examples, it is because they are detailed earlier in the organization's exclusion criteria.

Exhibit 2-20. Essential Components of Complaint/Grievance Procedures

- Complaint filing procedures
- Potential grounds for exclusion/removal from the resource database
- Confidentiality of the contested organization/service
- I&R/A staff or office charged with investigative and/or ruling functions
- Procedure for feedback to the complainant
- Appeal rights and procedures

Source: Dick Manikowski, "Setting Inclusion/Exclusion Criteria: Determining the Scope of a Resource File," *Information and Referral: The Journal of the Alliance of Information and Referral Systems* 22: 111-38 (2000).

Exhibit 2-21. Inclusion/Exclusion Complaint/Grievance Procedure Examples

Examples – Aging I&R

CALIFORNIA: Orange County Office on Aging (AAA)

Policy: To respond in a timely and comprehensive fashion to any formal complaints communicated to us regarding resources contained in our database.

Procedure:

A. When a complaint is received, take information in a professional, non-judgmental manner
B. Document, as comprehensively as possible, all information regarding the circumstances of the complaint.
C. Give this documentation to Gerontology Specialist who will:
    1. Check for prior complaints regarding this resource and review history.
    2. Call the complainant to acknowledge receipt of complaint, review circumstances and document any additional information
    3. Attempt to have the two parties speak directly to each other to resolve issue; if this is not an option, ask permission to follow-up with resource to assist in resolution
    4. If permission not granted and incident not reportable (see 5 below), no further follow-up to be done and report will be retained
    5. If incident is reportable to APS (possible elder abuse or neglect) or to the police department (possible crime), then call resource for clarification regardless of permission status
D. If incident reportable under 5 above, Information and Assistance Manager to write a confirmation letter to complainant confirming receipt of complaint
E. If incident reportable under 5 above or resource has 3 complaints within a year, a review panel, consisting of I&A Manager, Director of Operations and a third choice determined by the two members when considering the type of complaint shall review the entire case
F. This review board will take one of the 3 following actions based upon findings:
    1. Determine that no further action be taken
    2. Send a letter to the resource acknowledging the problems and requesting a written response outlining an action plan to rectify the situation, with a caveat that if a reasonable plan is not received within a specified period of time, the panel reserves the right to remove the resource from the database
    3. Remove the resource from the database. Provide written notification to the resources resource of decision (receipt requested)

OHIO: Ohio District 5 Area Agency on Aging, Inc. (AAA)

Adding or Amending Resource Information in Beacon I&R

Procedure:

The Elder Rights/Communications Resource Director will:

    a. Communicate with the potential resources that have failed to meet the requirements for automatic inclusion.
    b. Meet with a potential resource that has been excluded if the potential resource challenges the exclusion.
    c. Notify all staff via e-mail that a potential resource has been denied inclusion into our Beacon I & R.

4. The Executive Director will: Meet with a potential resource that requests a review of the exclusion after they have followed step #3 above.
5. The Board of Trustees will: Meet with a potential resource that requests a review of the exclusion after they have followed step #4 above.
6. Decision of the Board of Trustees is final.

Exhibit 2-21. Inclusion/Exclusion Complaint/Grievance Procedure Examples (Cont'd)

Examples – Aging I&R

OHIO: Info Line of Summit County – I&R, Senior I&R, and Emergency Services (aging I&R/A provider)
Informing Excluded Providers of Status and Options:
A. If an agency does not meet the criteria for inclusion in the resource file, the Resource Coordinator should inform the agency by phone.
B. If there is a challenge to the decision of exclusion, a meeting with the Program Supervisor can be arranged to explain the reasons for the exclusion.
C. If still not satisfied, a meeting with the Executive Director would be the next step, followed by a review by the Board of Trustees.

WASHINGTON: Senior Services of Seattle/King County (aging I&R/A provider)
Senior Information and Assistance reserves the right to make the final determination as to what organizations are included in the database and may remove or exclude any organization for fraud, misrepresentation, discrimination, service non-delivery or any other reason.
Agencies or organizations that want to appeal a decision by Senior I&A regarding the inclusion or exclusion decision should follow these guidelines:
1. Talk to the I&A Resource Data Manager to clarify program services in relation to this policy.
2. If concerns are not resolved by step one, a written request providing rationale for the appeal or concerns must be sent to the Director of the Senior Information and Assistance Project.
3. The Director, in consultation with the CEO of Senior Services will make a final determination.

Examples – Comprehensive or Non-Aging Specialized I&R

CALIFORNIA: InfoNet Tuolumne County (county-wide I&A; public/private funded; public agency coalition w/ CAC as lead agency)
Complaints: To be made in writing to the I&A Network Project Manager, (name).
Potential Grounds for Exclusion Removal: Service non-delivery or agencies that discriminate based on race, color, creed, national origin, ancestry, sex, marital status, disability, religious or political affiliations, age or sexual orientation; Organizations engaged in fraudulent or illegal activities. Agencies misrepresenting their services; Organizations that are not licensed (where licensing standards exist); Agencies existing for less than six months.
Appeal Process: If an organization has been excluded or removed according to the Inclusion/Exclusion criteria or a decision made by the Advisory Council, the director of the protesting agency may have a right to appeal by presenting the agency's case to the I&A Network Advisory Council.

FLORIDA: Big Bend 211 (Tallahassee, Florida 2-1-1)
Where special circumstances exist which are not effectively covered by the preceding guidelines, the organization in question will be reviewed for inclusion by the Information and Referral program staff and the Executive Director. If questions still remain, a review panel appointed by the President of the 2-1-1 Big Bend Board of Directors will make a recommendation to the Board about the appropriateness of inclusion on a case-by-case basis.
Agencies or organizations that want to appeal a decision by 2-1-1 Big Bend regarding the inclusion or exclusion decision should follow these guidelines:

1. Talk to the 2-1-1 Big Bend I&R Coordinator to clarify program services in relation to this policy

Exhibit 2-21. Inclusion/Exclusion Complaint/Grievance Procedure Examples (Cont'd)

Examples – Comprehensive or Non-Aging Specialized I&R

FLORIDA: Big Bend 2-1-1 (Cont'd)

2. If concerns are not resolved by step one, a written request providing rationale for the appeal or concerns must be sent to the Executive Director of 2-1-1 Big Bend.

3. The Executive Director will forward the letter to the 2-1-1 Big Bend Board Committee appointed by the President for a final decision.

4. Decisions of the Board Committee will be considered final.

INDIANIA: Lafayette, Indiana Community Resource Database

INFORMATION THAT IS EXCLUDED FROM THE DATABASE: In addition to not meeting the inclusion criteria, reasons that an organization would be excluded are as follows:

▪ For profit entrepreneurial or commercial organization.

▪ Be involved in providing illegal services, or be found to be discrimination against client or in employment practices on the basis of religion, race, ethnicity, national origin, gender, or disability.

▪ State or local laws, ordinance or derived regulations (codes of regulations or administrative codes) requires a license or permit to provide the service and the agency/service provider does not have one.

Lafayette Crisis Center reserves the right to refuse or discontinue listings for organizations, which are under investigation for any type of wrongdoing. Organizations will be "suspended" from use by means of removing keywords and taxonomy references. In the event they are cleared of suspicion, they will be reinstated by having keywords and taxonomy references restored. If they are found to be guilty of wrongdoing, the agency and program listing will be removed from the database.

APPEAL PROCESS: An organization may appeal an exclusion decision by submitting a written statement to the Lafayette Crisis Center, 1244 N. 15th St., Lafayette, IN 47904. The written statement should include a justification referencing the Inclusion/Exclusion Policy of the Lafayette Crisis Center, be dated, include the name, address, telephone numbers and signature of the appealing organization.

The Lafayette Crisis Center Information & Referral Specialist and Executive Director will review the appeal and make a decision. The appealing organization will be informed of the decision within 30 days/weeks.

If the appealing organization wishes to continue the appeal, they must notify the Lafayette Crisis Center Executive Director in writing within 30 days. The director will review this appeal with the Planning/Budget Committee of the Board of Directors and notify the appealing organization within 90 days of their decision.

12 Fees

The AIRS Standard for Inclusion and Exclusion stipulates:

> If the I&R service charges a fee for the inclusion of organizations in its database, that practice shall be published as a part of its inclusion/exclusion criteria.

The standard does not require publishing a notice when no fees are required, however, it is logical that the I&R/A do so in order that there be no misunderstandings.

In most cases that were reviewed, the organizations and services meeting inclusion criteria were offered inclusion without charge. In a few instances, they were also given an opportunity to buy additional services, for a nominal fee. Others offered additional services at no charge, such as hyperlinks and downloadable forms of the directory. For more ideas, see Exhibit 2-22, "Potential Fee-Based Products and Services."

Exhibit 2-22. Potential Fee-Based Products and Services

- Electronic, web-based, or printed directory subscriptions
- Access to additional components of the I&R software's tools:
    - Client Tracking/Case Management
    - Volunteer Matching
    - Donor Opportunity
    - Calendar
- Services:
    - Customized updates by resource specialist
    - Web site development
    - Custom Database Development
    - Mailing Labels
- Sponsorship recognition and promotional opportunities:
    - Acknowledgement
    - Hyperlinks to specific sponsor web pages
    - Logo display

The idea of charging fees can run counter to aging I&R/As that traditionally offer their services free of charge to the community. When queried, I&R/As charging fees reported that they only did so for extraneous services falling outside the traditional Older American Act I&R/A description, which needed ongoing additional revenue sources in order to be sustained. They never charged database inclusion fees. Some may argue that having a policy of no fees for any component of the resource database allows an I&R/A organization to retain absolute control over the final product.

A review of statements regarding the rights of database sponsors to make final decisions in the next section gives some ideas on strategies to retain the integrity of control over a resource database, file, or any resultant products.

By far the most frequent source of fees for both aging I&R/As and comprehensive I&Rs was subscriptions to electronic copies in print or web-based resource directories. Interestingly, Senior Services of Seattle/King County in Washington State limits public access to their complete online database. As it stands, the public can access free of charge only the part of the database that includes governmental and nonprofit entities.

Since Senior Services of Seattle/King County provides *callers* with information about for-profit entities, however, they include a caveat that they do not recommend any particular for-profit provider over another. The I&R offers subscription access to the online database that includes all resources no matter what their tax status. A copy of their online database description and a subscription agreement can be found in Appendix J.

See Exhibit 2-23 for more examples of how comprehensive I&Rs have addressed the issue of fees.

Exhibit 2-23. Inclusion/Exclusion Criteria for Fees

Examples – Aging I&R

WASHINGTON: Senior Services of Seattle/King County (I&R/A provider)
At this time, Senior Information and Assistance has two versions of the on line database available:

- The complete database of over 7,200 entries is available to case managers and other subscribers who are issued a special password to access the full database. The cost for unlimited access for one year is $125. For more information, email (<u>contact email address</u>) or call (<u>contact name and phone number</u>).

- An abbreviated version of the database is available for the general public and contains over 2,000 records. Users can find information on senior centers, subsidized housing, adult day centers and other non-profit and governmental organizations. For information about private businesses (attorneys, guardianship services, home care, retirement facilities, nursing homes, etc.) not found in the public database, email (<u>contact email address</u>) or phone (<u>number</u>)

Examples – Comprehensive or Non-Aging Specialized I&R

CONNECTICUT: 211 Infoline (statewide 211)

Inclusion in the Infoline database is free, and is completely unrelated to whether an organization purchases separate advertising space in any of UWC's products or membership in the agency, or is a partner in any collaboration.

NEW YORK: Central Referral Service, Inc. (2-1-1, includes AAA info from 1 county)
Methodology: There are no fees for inclusion in any database maintained by Central Referral Service.
On Web Site: The following items and services are presently available for purchase:
Directory in Printed Form:
- Erie County Directory of Community Services. (2004– 2005 Edition)
Directories on Disk (3½" floppy)
- Erie County Directory of Community Services
- Directory of Community Services for people with Developmental Disabilities
Services
- Lists and Mailing Labels
- Custom Database Development
- Develop Public Information Servers

Exhibit 2-23. Inclusion/Exclusion Criteria for Fees (Cont'd)

Examples – Comprehensive or Non-Aging Specialized I&R

FLORIDA: Big Bend 2-1-1

Products & Directories: 2-1-1 Big Bend publishes several directories and manuals:

1. **Community Resource Directory** – *Our popular printed guide to human services in Tallahassee/Leon County and the Big Bend area. Published every 2 years. Online ordering available. 2003-2004 edition is now available.*
2. ***Community Resource Directory-on-Disc*** *– A software version of the 2-1-1 Big Bend Community Resource Directory for those who need current referral information on their own workstations or laptops. Online ordering available.*
3. ***FLAIRS Directory of Helpline Services in Florida*** *– A statewide directory of helplines in Florida published on behalf of the Florida Alliance of Information and Referral Services. 2003-2004 edition is now available.*
4. ***Custom Product****s Individualized products developed on request, including mailing labels and resource directories. Please contact our Information and Referral Coordinator at (phone number) for details and price quotes.*

INDIANA: Lafayette Indiana Community Resource Database (Crisis Center)

Inclusion in the database, community service directory, directory on disk and community kiosk is free.

13 Database Update Capability

With an increased number of web-based applications for I&R resource databases, combined with aging services' traditional processes for community involvement and the ongoing issue of limited resources, it is almost inevitable that someone will suggest that community organizations and service providers be given the opportunity to input and update their own profiles, including service and program records.

Empowering service providers with the ability to educate the public about their programs and services is well-intended, but it might prove to be an administrative and expensive challenge over time. It has been tried by many community-based entities with varying levels of success and failure.

The idea is not altogether unmanageable, but it will most likely reduce the potential to ensure an up-to-date, accurate, and consistent database, unless there is a filtering process before information is approved for public consumption. It will also require additional effort and funds, beyond normal database management, to implement and sustain the effort.

Some of the activities organizations have incorporated to operate such community-driven databases include:

- Screening of potential participants

- Ongoing coordination and training of provider organizations

- Ongoing review, editing, and possible rejection of new and revised records to ensure appropriateness and accuracy

- Report tool access for participating entities

- Community education

- Administration of the overall process, which may include fees for different levels of inclusion

To address the issue of integrity many aging I&R/As only authorize publication of new information after a thorough internal review for stylistic compatibility, content accuracy, and service/program appropriateness.

Organizations may initially be very interested in participating, but

staffing and funding priorities can change very quickly. In general, I&R organizations that internally update all data find that it is already difficult to elicit service and program update information, even with numerous requests sent via varying methods. It is unusual to find an organization that will continue to update its own information on a regular basis, even with recurrent training and prompting.

It is very important to maintain stylistic integrity no matter how many individuals are involved in the data input process so that consumers can successfully search the database for needed and wanted services. Consistency is also needed so that the taxonomy can be applied.

The issues surrounding the updating of organizations' own profiles are numerous, but secondary to the larger issue of maintaining the integrity of the database as a whole. The development of an inclusion/exclusion policy, including criteria, disclaimers, and grievance procedures, is predicated on the idea of enhancing the quality of aging I&R/A systems. One way to measure quality is to assess whether or not the aging I&R/A meets the AIRS Standards for Resource Database Maintenance:

> Standard 9: Database Maintenance: The resource database shall be computerized, maintained by trained resource staff and updated through continual revision at intervals sufficiently frequent to ensure accuracy of information and comprehensiveness of its contents.

A thorough understanding of the AIRS Standards, an organization's inclusion/exclusion policy and relevant programs and services — combined with demonstrated competency in applying the taxonomy — are ingredients necessary to most likely ensure the integrity of an I&R resource database. Making use of the same taxonomy and applying same or similar database parameters will also allow for eventual cross-database communication if that is ever desired.

14 Right of Database Sponsor to Make Final Decisions

In several policies reviewed, criteria addressed the ability of the sponsoring organization to make final decisions on all matters pertaining to inclusion or exclusion. Most allowed flexibility for the sponsor so that essential services not clearly fitting the specified criteria could be included, and those that were deemed inappropriate, but on the surface might meet the criteria, could be excluded.

The document *Setting Inclusion/Exclusion Criteria* notes that this "wiggle-factor" or building in of flexibility should be used sparingly, so that the majority of decisions are based on the specific inclusion and exclusion criteria contained in the policy. Periodic reviews and revisions of the criteria should attend to any areas where decisions are not based solely on the criteria, thereby keeping the number of exceptions to a minimum.

It cannot be emphasized enough how important it is that staff and the community have clear and workable criteria for decision-making. Some examples are shown in Exhibit 2-24.

Exhibit 2-24. Examples Indicating Right of Database Sponsors to Make Decisions

Examples – Aging I&R

CALIFORNIA: A1AA Senior I&A (AAA)

Where special circumstances exist which are not effectively covered by the preceding guidelines, the A1AA will review any organization for inclusion.

OHIO: Area Agency on Aging District 7, Inc. (AAA)

The Area Agency on Aging Dist. 7, Inc. reserves the right to exclude and/or remove any agency/organization/group from the Resource Directory database.

WASHINGTON: Senior Services of Seattle-King County (aging I&R/A provider)

Senior Information and Assistance makes the final determination as to what organizations are included in the database and may remove or exclude any organization for fraud, misrepresentation, discrimination, service non-delivery or any other reason.

Examples – Comprehensive or Non-Aging Specialized I&R

CALIFORNIA: HelpCentral.org – Butte County Information and Referral Project

Guidelines, not Rules: The criteria listed below are general guidelines. Exceptions will be considered on a case-by-case basis. Decisions are made by the Butte County Information and Referral Management Team.

FLORIDA: 2-1-1 Big Bend, Tallahassee, Florida

Where special circumstances exist which are not effectively covered by the preceding guidelines, the organization in question will be reviewed for inclusion by the Information and Referral program staff and the Executive Director. If questions still remain, a review panel appointed by the President of the 2-1-1 Big Bend Board of Directors will make a recommendation to the Board about the appropriateness of inclusion on a case-by-case basis.

GEORGIA: United Way 2-1-1

United Way 2-1-1 reserves the privilege of final determination of the appropriateness of an organization for the information database.

INDIANA: Lafayette Indiana Community Resource Database (crisis center)

Lafayette Crisis Center, in its sole discretion, may exclude an organization regardless of the services offered by such organization.

LOUISIANA: 232-Help/211 Southwest Louisiana Education and Referral Center

232-HELP/211 reserves the right to make all decisions regarding the inclusion or exclusion of information relative to individuals and/or organizations within the resource file database. Although inclusion/exclusion decisions will, for the most part, be made based upon the perceived needs of the clients/users of 232-HELP/211, the final determination as to inclusion or exclusion, the provisions of the criteria listed below notwithstanding, shall be in the sole discretion of 232-HELP/211.

15 Disclaimers

A review of inclusion/exclusion criteria and policies evidenced disclaimers or other statements that addressed two areas: 1) Non-responsibility for the quality of services contained in the resource database; and 2) Non-endorsement of the services contained in the database.

A number of disclaimers also indicated that users were responsible for any decisions made as a result of viewing or contacting resources contained within the database. The disclaimers ranged from very simple one-sentence declarations to more detailed and complex statements.

An organization may deem it prudent to review such statements for legal, funding source, or mission-based appropriateness. Incidents have occurred where consumers have deduced that the resources contained in a database have somehow been approved or that their quality is guaranteed. If the consumer is then harmed by using one of the contained resources, it is conceivable that the database sponsor could be construed as responsible and, therefore, be potentially liable. Were this to happen an inclusion and exclusion policy will most likely be requested for review and possible evidence of such responsibility.

It is, therefore, imperative that the database sponsor and staff use phraseology in their disclaimers and inclusion/exclusion policies that clearly disassociates the I&R service from any guarantee or recommendation of resources contained in the database. For example, it would not be prudent to advertise that the resource specialist contacts licensing or regulatory agencies to update residential care facility information.

Advisory boards or planning workgroups may bring valuable insight when developing disclaimer statements.

Exhibit 2-25. Inclusion/Exclusion Disclaimer Examples

Examples – Aging I&R

CALIFORNIA: Orange County Office on Aging Information & Assistance (AAA)
Disclaimer: Inclusion does not imply endorsement and omission does not indicate disapproval.

MINNESOTA: MinnesotaHelp.info – Minnesota Board on Aging (SUA)
Disclaimer from Minnesota Board on Aging, Department of Human Services, and other MinnesotaHelp.info sponsors: References and resources from this web site or from any of the information services provided by agencies or providers in this database including any entities, products, services or information does not constitute an endorsement or recommendation by the MBA or any of the sponsors of this web site. The sponsors of the MinnesotaHelp.info web site are not responsible for the contents of any resource information or links referenced by the agencies listed on this website. Although our pages include data and links to sites including or referencing collections of information, the sponsors do not endorse ANY specific products or services provided by public or private organizations.

By using this site, the user takes full responsibility to research the services listed for further eligibility or use information. In order to be included in this website, the sponsors have adopted an inclusion/exclusion policy. Any questions about content, resource listings, page links or the policy should be directed to the MinnesotaHelp.info data manager at providerupdates@housinglink.org.

OHIO: Area Agency on Aging District 7, Inc. (AAA)
The Area Agency on Aging Dist. 7, Inc. assumes no responsibility regarding the quality of services provided by agencies/organizations in the database. Inclusion in the database does not imply endorsement.

OHIO: Info Line of Summit County – I&R, Senior I&R, and Emergency Services (aging I&R/A provider)

Introduction: It is the function of Info Line to provide information about and referrals to a broad range of human service agencies throughout the County of Summit. It is the intent of the program that specialists will provide as much information as possible to individuals who call to enable them to make an informed decision abut which of the available resources may best meet their needs. While Info Line specialists will strive to give the most accurate and appropriate information and/or referrals possible, info Line is not responsible for the quality of service delivered by any agency to which a caller is referred. Specialists are to refer to available agencies, not to recommend one over another.

It shall be Info Line's practice to maintain as comprehensive a file as possible of agencies and programs whose services are directed toward the solution of human problems.
On front page of Web site: Info Line does not endorse any agency. We simply provide information as a public service

WASHINGTON: Senior Services of Seattle-King County (aging I&R/A provider)

No endorsement or lack of endorsement of any program/service shall be construed from its inclusion in or omission from the I&A Resource Database

Exhibit 2-25. Inclusion/Exclusion Disclaimer Examples (Cont'd)

Examples – Comprehensive or Non-Specialized Aging I&R

CALIFORNIA: HelpInfo.org – Butte County Information and Referral Project

Disclaimer: Inclusion in the database does not constitute an endorsement or recommendation of services, nor does exclusion signify disapproval.

CALIFORNIA: InfoNet Tuolumne County

InfoNet Database Disclaimer: InfoNet does not endorse any service or organization included in our database. We are not responsible for any data inaccuracies or omissions. The user assumes all risks related to any misinformation. InfoNet welcomes input to help keep our database current. If the service or agency you are looking for is not listed, or the information is not accurate, please write to (name) at 427 N. Highway 49 #302, Sonora, CA 95370 or e-mail (e-mail address).

Community Links Disclaimer: InfoNet cannot attest to the accuracy of information provided by linked sites. Linking to a web site does not constitute an endorsement by InfoNet, its employees, or sponsors

GEORGIA: United Way 2-1-1

Inclusion in the United Way 2-1-1 database means that our trained Call Center Agents will provide interested callers with information regarding your organization's services. Please keep in mind that inclusion in the United Way 2-1-1 database does not imply endorsement by United Way of Central Georgia and we will make every effort to provide our callers with as many referrals as possible to meet their needs so as not to overburden any one agency. United Way 2-1-1 is not responsible for the quality of service delivered by an agency to which the caller is referred; nor does United Way 2-1-1 recommend or endorse agencies.

INDIANA: Lafayette Indiana Community Resource Database (crisis center)

Disclaimer: The database is intended only as a listing of the many services that are available to residents of Tippecanoe and the surrounding counties. Information collected by Lafayette Crisis Center is voluntary by the organizations that are listed. Staff of the Lafayette Crisis Center reserves the right to edit information to meet format, guideline and space requirements. Staff does not evaluate the programs and services.

Inclusion of a program or service in the database does not in any way represent or imply a determination or approval of the quality of those services. Exclusion does not reflect on any organizations contribution to the community.

Lafayette Crisis Center neither guarantees nor makes any representation as to the accuracy or completeness of the information contained in the database. Lafayette Crisis Center disclaims any and all responsibility and liability that may be asserted or claimed resulting from or arising out of reliance upon the information and procedures presented in the database.

KENTUCKY: KyCARES (state sponsored statewide database)

Disclaimer: No endorsement is intended or made of any hypertext link, product, service, or information either by its inclusion or exclusion from this page or site. While all attempts are made to insure the correctness and suitability of information under our control and to

Exhibit 2-25. Inclusion/Exclusion Disclaimer Examples (Cont'd)

Examples – Comprehensive or Non-Specialized Aging I&R

KENTUCKY: KyCARES (Cont'd)
correct any errors brought to our attention, no representation or guarantee can be made as to the correctness or suitability of that information or any linked information presented, referenced, or implied.

All critical information should be independently verified.

The inclusion of links from this site does not imply endorsement by the Commonwealth of Kentucky. The Commonwealth makes no endorsement, express or implied, of any links to or from its site, nor is it responsible for the content.

LOUISIANA: 232-Help/211 Southwest Louisiana Education and Referral Center
232-HELP/211 makes no specific warranties, representations as to actual inclusions or exclusions and assumes no liability, whatsoever, with regard thereto.

MAINE: Ingraham Resource Link (Cumberland County I&R – also statewide)
Disclaimer: This on-line guide to services is meant to help people find available services. Many of the services listed are provided by non-profit and public agencies and may be available at little or no cost to eligible individuals. Some of the services listed are offered by commercial companies who charge a fee for services. Every attempt is made to provide a comprehensive listing and up-to-date information. Records are updated regularly, but all details should be confirmed with the agency that provides the service. Ingraham cannot guarantee the accuracy of any listing and is not liable for damages resulting from errors or omission in the data. Please help us keep this information accurate by reporting any errors or missing information by email to resourcelink@ingraham.org. Users should note that the appropriateness of a service depends on a variety of factors, which cannot be properly represented or accounted for on a web page. The information available through Resource Link is therefore intended as general information only, and is not intended to serve as a substitute for talking to an information and referral specialist or professional. To speak to an information and referral specialist dial 774-HELP (4357) or 888-568-1112.

Ingraham does not recommend or endorse any services provided by agencies found on this website. Ingraham is not responsible for any decisions made or actions taken by users as a result of the information obtained herein. Ingraham reserves the right to include or exclude data in accordance with its approved policies. Reference herein to any specific commercial products, process, or service by trade name, trademark, manufacturer, or otherwise, does not constitute or imply its endorsement or recommendation.
Some pages on this web site contain links to information created and maintained by other public and private organizations. Please be aware that we do not control or guarantee the accuracy, relevance, timeliness, or completeness of this outside information. Further, the inclusion of a link to particular items in hypertext is not intended to reflect their importance, nor is it intended to endorse any views expressed or products or services offered by the author of the reference or the organization operating the server on which the reference is maintained.

Exhibit 2-25. Inclusion/Exclusion Disclaimer Examples (Cont'd)

Examples – Comprehensive or Non-Specialized Aging I&R

WYOMING: Connect Wyoming (statewide database)

Disclaimer: Connect Wyoming uses the above criteria as a guideline, with the knowledge that there may be exceptions to the stated criteria. Inclusion of a program into the Pathways Plus database does not imply approval of the program by Connect Wyoming, the Wyoming Institute for Disabilities, or the University of Wyoming. Exclusion of a program or agency does not imply a lack of contribution to the community by that program or agency. Connect Wyoming reserves the right to exclude agencies and programs which we feel do fit our mission.

16 Terms of Use Agreements and Other Disclaimers or Notices

When researching Web sites containing aging I&R/A resource databases, a few came to light that combined the resource information of several aging I&R/As into one site. In these cases, there were no specific inclusion and exclusion criteria evidenced on their Web sites, even though each contributing organization may in fact have such criteria and policies in place. What was evident were more general notices about the site as a whole.

SeniorNavigator.com® in the Commonwealth of Virginia, for example, is a robust, user-friendly Web site that contains information from various sources, such as area agencies on aging, caregiver support groups, domestic violence shelters, geriatricians, insurance counseling organizations, and senior centers. The Web site's very specific "Terms and Conditions of Use," a "Privacy Statement," and "About Our Database" sections are quite specific and worth reviewing. A copyright statement indicates that all rights are reserved in regard to Web site contents, text, graphics, images, artwork, logos, interviews, stories, etc. created by SeniorNavigator.com.

Another example is the multi-county **Network of Care** site *www.networkofcare.org*. Developed with funding from the California Department of Aging, each network site has similarly integrated information from various sources. In addition to a service directory for each geographical area and target population, each site contains a broad collection of online and off-line resources, including various communications tools, online forums, chat rooms, discussion boards and media content. A notice on each aging and disability-related front page reads:

> This comprehensive, Internet-based resource is for the elderly and people with disabilities, as well as their caregivers and service providers.

Within each Network of Care site there is a provider log-in section that requires the user agree to a very specific *Terms of Use* agreement before being allowed entrance into input screens. The terms cover not only the inputting of information, but all other aspects of the site as well, such as chat rooms,

international use, copyright issues, proprietary rights, user conduct and a disclaimer of warranties. The agreement wording is well worth reviewing for possible similar use with a comprehensive Web site.

To see an example of policies developed for a comprehensive I&R Web site and posted with inclusion and exclusion criteria, go to **Infoline 2-1-1 of Connecticut** at *www.infoline.org*. The site's "Terms and Conditions of Use" contain copyright and license information, as well as wording for the copyright of service terms found in the *INFOLINE of Los Angeles AIRS Taxonomy of Human Services.*

Inclusion/Exclusion Policy Checklist

To assist your own policy development, the chart below highlights the possible components of an aging I&R/A inclusion/exclusion policy.

Exhibit 2-26. Inclusion/Exclusion Policy Checklist

- Description of aging I&R/A entity
- Mission/vision
- Purpose of policy
- Responsibility for operational aspects of policy
- Service area of aging I&R/A (may also be part of inclusion)
- Inclusion/exclusion guidelines
    - Definitions (e.g., 'privilege' vs. 'right')
    - Inclusion criteria: "Adequately address needs of target population(s)"
        - ☐ Critical services: Government, non-profit, critical for-profit organizations, other for-profit organizations, support groups /other critical unincorporated entities
        - ☐ Provides timely updates
        - ☐ Adequate staff
        - ☐ Service or geographical priorities
        - ☐ Professional organizations/trade associations providing customized referral services
        - ☐ Fits into taxonomy
        - ☐ 800 Numbers
        - ☐ Other _____
    - Exclusion criteria:
        - ☐ Illegal/misrepresentation
        - ☐ Discriminate on the basis of race, color, religion, national origin, age, veteran status, gender, sexual orientation, other
        - ☐ Members-only
        - ☐ No community-based services
        - ☐ Primarily commercial
        - ☐ Individual contractors or practitioners (unless critical service)
        - ☐ Patterns of complaints
        - ☐ Non-verifiable business
        - ☐ License revocation/lapse
        - ☐ Inadequate proof of business sustainability
        - ☐ Other _____

Exhibit 2-26. Inclusion/Exclusion Policy Checklist *cont'd*

- Procedure
    - Maintaining and updating I&R resource database software
    - Maintaining and updating resource information
        - ☐ Schedule
    - Adding or amending resource information
        - ☐ Application/request for inclusion process
        - ☐ Resource information (may be part of different policy)
            - Standardized profile
            - Data elements
                - Required
                - Optional/recommended
- Fees/no fees: Include benefits of any fees and/or benefits for no fee participation
- Ownership of data
- Disclaimers and/or legal
- Grievance procedure
- Policy publication and dissemination
- Policy review schedule

List of Appendices

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> California A1AA Inclusion/Exclusion Policy

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> California HelpCentral.org Inclusion/Exclusion Policy

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> Orange County, California Office on Aging Complaint
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> Lafayette, Indiana Community Resource Database Inclusion/
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Appendix G
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> Info Line, Inc. of Summit County, Ohio Inclusion and Exclusion
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> Senior Services of Seattle/King County, Washington
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Appendix A
California — Area 1 Area Agency on Aging

Inclusion/Exclusion Policy

Inclusion/Exclusion Policy

Standards for Inclusion/Exclusion in A1AA's

Senior Information and Assistance's Resource Database

Senior I & A brings people and services together through our call center services, database and publication services, and a web resource service. Our goal is to connect clients to health and human service providers that cover a broad range of programs and services, from access to basic necessities to the enhancement of personal and social growth. These services may be provided by governmental agencies, health services, non-profit organizations, or an organization that provides a unique, specifically targeted or difficult to access service.

In collecting and maintaining information about programs and services listed in our data bases, publications, and web sites, we give first priority to information about services that are free, low cost or subsidized, and meet basic subsistence and survival related services. This may include other information and referral organizations. This does not imply endorsement or lack of endorsement for any included or excluded organization (see inclusion/exclusion).

This document 's purpose is to provide an outline for those receiving services from Senior Information and Assistance centers, and for listing or delisting provider services.

Client Triage

Services for people who may experience barriers to service because of the following factors receive first priority:

Age including risk factors associated with infants, children, youth or seniors;

Low income;

Unemployment or lack of education or literacy

Physical, mental or developmental disabilities

Homelessness or social isolation

Immigration or refugee status

Fear of violence

First Priority Client Needs

Food, clothing and shelter

Emergency assistance

Crisis intervention

Financial assistance

Legal and correctional services

Victim services

Immigrant and refugee services

Physical and mental health

Employment and training

In-Home support services

Child care I & R, Councils

Second Priority Client Needs

Education

Recreation

Consumer assistance

Environment

Things readily avail in phone book

Inclusion

Non profit agencies which provide community services

Governmental (public) agencies which provide social, education or health services

Local Self-Help support Groups

Community and civic advocacy groups

Hospitals and health clinics

Local, regional or national Toll-Free telephone services if they offer a social health or community service meeting the first two priorities

Regional or national organizations that serve residents of the local area but are located out of local service area

For-Profit organizations offering health and human services not adequately provided by the non-profit sector, or offering services parallel to non-profit services

Public Libraries

Information and Assistance Referral Agencies/Programs for services of a health or human services nature

Exclusion

Elected governmental officials

Private, or commercial, for-profit organizations that do not meet the inclusion criteria

Services which are only available to members of a certain group or affiliation

Churches not offering community-based services

Individual In-Home workers (child care, respite, health workers)

School programs that are not public or non-profit

Any organization which promotes or delivers illegal services, misrepresents themselves

Any organization that fails to respond to updating requests/contacts

Organizations with substantial documented complaints

Organizations that deny service based on prejudice or discrimination.

Agencies or organizations that have been in business less than six months

Trade and professional organizations

Organizations that provide free services when their primary purpose is to market the organizations main business

Programs where standards of service quality are heavily regulated and for which there exists a governmental entity that adequately provides central referral for the services (for example, nursing homes and board and care homes).

****

Where special circumstances exist which are not effectively covered by the preceding guidelines, the A1AA will review any organization for inclusion.

****

Each point of access to the listings of programs and services maintained by the AIAA is subject to further scrutiny.

Resource Data Base

Most inclusive

No Drs, Lawyers or other private professional services

(Option to list category of service and note that referral was made :look at phone book listing)

May include certain individuals and for-profit organizations when no other referral is available

Includes information on: Program and Agency names

        Addresses

        Phone numbers

        Fax, web and Email

        Description of services

        Service area

        Languages

        Intake procedures

        Fees

        etc...........

Printed Information Directories

Restrict listings to those organizations and agencies for which it is determined difficult to access from other media sources (yellow-pages, phonebook), and local resources.

May include frequently requested referral sources

Listings will include: Organization name

        Telephone number

        Address

        E-mail and or Web page address

        Brief Description of service

Web Page

Includes filtered information from the Resource Data Base, excluding any information the organization has deemed non-public (fees, private phone numbers, etc............).

Appendix B

California — HelpCentral.org

Inclusion/Exclusion Policy

Inclusion/Exclusion Policy

Purpose of the Policy: The purpose of this policy is to guide decisions about which service providers to include in the database maintained by the Butte County Information and Referral Project. The policy also guides decisions about which service providers to exclude.

Disclaimer: Inclusion in the database does not constitute an endorsement or recommendation of services, nor does exclusion signify disapproval.

Guidelines, not Rules: The criteria listed below are general guidelines. Exceptions will be considered on a case-by-case basis. Decisions are made by the Butte County Information and Referral Management Team.

Criteria for including service providers: An agency or service provider may be included if it meets one or more of the following criteria:

1. A non-profit or public agency that provides a low-cost/no-cost health or human service in Butte County.

2. Services are accessible to the public. Accessibility implies a no-cost or sliding fee scale ensuring that people who cannot afford private sector services can obtain services.

3. A membership organization such as a church or social club that offers a service to the community at large. A private company that provides a community service at no cost or with a sliding fee scale.

4. Elected representatives for Butte County.

5. A professional organization (especially those organizations in the social service field).

6. A for-profit organization whose fees are subsidized by a third party, so the service is free or low-cost to consumers of services.

Viability/Stability Test:
In most cases, organizations should also meet both of the following criteria:

1. The organization has an office location (not just a contact number).

2. The organization has been in existence for at least year, or if less than year cn demonstrate that it has adequate fiscal and other resources to give it a reasonable chance of viability.

Criteria for excluding agencies and organizations: An agency, organization or service provider may be excluded if one or more of the following criteria apply:

1. A for-profit organization that does not provide a unique service not otherwise available.

2. An organization that exists solely for the purpose of promoting a political or social agenda and that does not provide direct services to individuals or families.

3. The organization has been in existence for less than one year.

4. The organization has no staff.

5. The service provider is a private practitioner (Individual practitioners who provide a unique service not available through non-profit agencies may be considered. Professional membership associations that provide public referrals to their members will be included.)

Adopted September 2002
Comments? Contact the Project Coordinator at 530.895.2608 or email us.

Appendix C
Orange County, California
Office on Aging
Inclusion/Exclusion Policy
and Complaint Procedure Policy

SUBJECT: Inclusion/Exclusion	Page 1 of 2	Policy No.
	EFFECTIVE DATE **January 1, 2004**	**12**
PREPARED BY/TITLE Julie Loats, Information and Assistance Manager	**APPROVED BY/TITLE** **Mary Paul, Interim Executive Director**	

Policy:

To utilize a standardized method to determine if organizations are eligible to be listed in the Refer database, which includes posting on the Office on Aging website

Procedure:

A. All Orange County based non-profit or for-profit organizations that provide or coordinate health, human or community-based services for older adults or persons with disabilities are eligible to be included in the database

B. All eligible organizations must fill out the Application for Inclusion in the Resource Database in its entirety, providing general and detailed information regarding their service, including status as a for-profit or non-profit entity

C. All eligible organizations may have a link to their website on the Office on Aging website, but this link is restricted to their home page only

D. No eligible organizations may post any diagnostic or assessment tools directly on the Office on Aging website, but may have a link as described in (C) above

E. An organization will not be included in the database under the following circumstances:

   1. Located outside of Orange County (unless no other comparable services available in Orange County)

   2. Denies service based on color, race, religion, gender, sexual orientation, ancestry, nationality or any other basis not permitted by law or whose services are divisive or discriminatory

   3. Provides an illegal service

   4. Services cannot be verified

   5. Services are misrepresented

F. The information will be updated formally on an annual basis by sending out a form to the resource with the information we currently have and a request to make any changes and return (if none, the current information will remain)

G. The changes will be made into the Refer database and, if appropriate, posted onto the website

H. Ongoing changes will be made if and when we receive new information

Disclaimer: Inclusion does not imply endorsement and omission does not indicate disapproval.

SUBJECT: Complaint Procedure	Page 1 of 2	Policy No. 3
	EFFECTIVE DATE January 1, 2004	
PREPARED BY/TITLE Julie Loats, Information and Assistance Manager	APPROVED BY/TITLE Mary Paul, Interim Executive Director	

Policy:

To respond in a timely and comprehensive fashion to any formal complaints communicated to us regarding resources contained in our database.

Procedure:

A.   When a complaint is received, take information in a professional, non-judgmental manner

B.   Document, as comprehensively as possible, all information regarding the circumstances of the complaint.

C.   Give this documentation to Gerontology Specialist who will:

   1.   Check for prior complaints regarding this resource and review history.

   2.   Call the complainant to acknowledge receipt of complaint, review circumstances and document any additional information

   3.   Attempt to have the two parties speak directly to each other to   resolve issue; if this is not an option, ask permission to follow-up with resource to assist in resolution

   4.   If permission not granted and incident not reportable (see 5 below), no further follow-up to be done and report will be retained

   5.   If incident is reportable to APS (possible elder abuse or neglect) or to the police department (possible crime), then call resource for   clarification regardless of permission status

D.   If incident reportable under 5 above, Information and Assistance Manager to write a confirmation letter to complainant confirming receipt of complaint

E.   If incident reportable under 5 above or resource has 3 complaints within a year, a review panel, consisting of I&A Manager, Director of Operations and a third choice determined by the two members when considering the type of complaint shall review the entire case

F. This review board will take one of the 3 following actions based upon findings:

   1.   Determine that no further action be taken

   2.   Send a letter to the resource acknowledging the problems and requesting a written response outlining an action plan to rectify the situation, with a caveat that if a reasonable plan is not received within a specified period of time, the panel reserves the right to remove the resource from the database

   3.   Remove the resource from the database. Provide written notification to the resources resource of decision (receipt requested)

Appendix D

Atlanta, Georgia Regional Commission (ARC) Area Agency on Aging

Data Entry Procedures

Data Entry Procedures
Aging and Long Term Care Database

Inclusion Exclusion Policies

Providers will be listed in the database ESP/CONNECT if they:

- Provide services to the community in at least one of the categories defined by CONNECT's Taxonomy of Aging and Long-Term Care Services.

- Are certified or licensed by the appropriate levels of government where such provisions for such certification or licensing exist.

- Are in compliance with any established, applicable local, state, or federal laws and regulations.

- Demonstrate provision of service for at least three months, show evidence of an established service site, show evidence of an approved site, and show evidence of community involvement in or oversight of the service (i.e. Board of Directors, Letters of Reference) when no licensing certification or regulations exist.

- Supply requested information and other updates for the database in an accurate and timely manner.

- Provide service without regard to race, color, religion, or national origin.

Exclusion of Providers from CONNECT

Providers will be excluded from the database CONNECT if they:

- Have their certification or license revoked by a level of government.

- Have their certification and/or organizational membership revoked by a recognized group of peers who set professional standards.

- Exhibit a pattern of failing to respond in a timely and satisfactory manner to client complaints reported to and identified by ARC Aging Information Specialists.

- Neglect to supply information and other updates in an accurate and/or timely manner.

Aging and Long Term Care Inclusion Criteria per Category:

Adult Day Care – In 2002, The Georgia General Assembly passed a bill requiring Adult Day Care Centers to be licensed; however, there is no current mechanism in place to implement this licensure requirement. Therefore, the general inclusion criteria should be applied.

Advocacy Assistance – Apply general inclusion criteria.

Care Management – Apply general inclusion criteria. (Provider must not be receiving reimbursement fees from referral sources.)

Community Care – Inclusive of DHR-approved providers enrolled in the CCSP Program. Immediate inclusion upon verification of provider.

Consumer Services – Apply general inclusion criteria.

Educational Programs – Apply general inclusion criteria for all services with the exception of libraries designated by the Georgia Public Library Services (GPLS) *http://www.public.lib.ga.us.* Immediate inclusion upon verification of service providers.

Elder Abuse/Neglect

- ❑ **Adult Protective Intervention** – Inclusive of those agencies charged by DHR Department of Family and Children Services as providing Adult Protective Services *(http://dfcs.dhr.georgia.gov).* Immediate inclusion upon verification of service provider's designation.

- ❑ **Institutional Abuse/Neglect** – Inclusive of those agencies charged by DHR Office of Regulatory Services and the Division of Aging Services as providing complaint intake and investigation. Immediate inclusion upon verification of service provider's designation.

Emergency Management – Inclusive of agencies designated by the Georgia Emergency Management Agency (GEMA) as the key local emergency management agency. Immediate inclusion upon verification of service provider's designation. *(http://www.gema.state.ga.us/).*

Emergency Response Systems - Apply general inclusion criteria.

Appendix E

Indiana — Lafayette Crisis Center Community Resource Database

Resource Database Inclusion/Exclusion Policy

Lafayette Indiana

Community Resource Database

Inclusion/Exclusion Policy

The following policy applies to the Lafayette Crisis Center Community Resource Database. This policy is intended as a general guide and may be changed by Lafayette Crisis Center as needed.

DISCLAIMER

The database is intended only as a listing of the many services that are available to residents of Tippecanoe and the surrounding counties. Information collected by Lafayette Crisis Center is voluntary by the organizations that are listed. Staff of the Lafayette Crisis Center reserves the right to edit information to meet format, guideline and space requirements. Staff does not evaluate the programs and services.

Inclusion of a program or service in the database does not in any way represent or imply a determination or approval of the quality of those services. Exclusion does not reflect on any organizations contribution to the community.

Lafayette Crisis Center neither guarantees nor makes any representation as to the accuracy or completeness of the information contained in the database. Lafayette Crisis Center disclaims any and all responsibility and liability that may be asserted or claimed resulting from or arising out of reliance upon the information and procedures presented in the database.

Inclusion in the database, community service directory, directory on disk and community kiosk is free.

INFORMATION THAT IS INCLUDED IN THE DATABASE

Lafayette Crisis Center, in its sole discretion, may exclude an organization regardless of the services offered by such organization. Generally, priority for inclusion is given to programs and services that:

⬤ Directly serve the public at-large and that are offered by non-profit human services organizations.

⬤ Government agencies (federal, state, county, city) that provide services in the areas of health, welfare, recreation, or education. No attempt will be made to list all government agencies or departments.

⬤ Organizations (such as churches, social clubs) that offer a service to the community at large, not just their own members.

⬤ Self-help support groups with at least six months of activity.

⬤ Elected representatives (federal, state, county, city)

⬤ Hospitals

⬤ Organizations outside our geographic area. 800 lines that offer a social or community service available to local residents.

⬤ Professional organizations, especially those in the social service field.

⬤ Advocacy groups and community councils.

⬤ Respond to needs that are unmet (either service is not available or demand substantially exceeds supply) by the non-profit sector, offered by a for-profit organization.

⬤ Resources not adequately catalogued in other community databases.

CONTROVERSIAL ACTIVITIES

Some organizations provide services or advocate on issues which maybe controversial in nature. Information about an organizations policies, views, or issues which assist will potential consumers in selecting a resources should be included in that agency's record in the database. Examples of this type of information include religious observances, which are required in order to obtain services or the organization's points of view on issues. Whenever possible, the resource file should include organizations which represent a variety of points of view on any given issue in order to provide callers with a choice of options.

OTHER INFORMATION THAT IS INCLUDED IN THE DATABASE

Categories of "how-to" information that guide people through the process of obtaining services or giving effective referrals.

INFORMATION THAT IS EXCLUDED FROM THE DATABASE

In addition to not meeting the inclusion criteria, reasons that an organization would be excluded are as follows:

● For profit entrepreneurial or commercial organization.

● Be involved in providing illegal services, or be found to be discrimination against client or in employment practices on the basis of religion, race, ethnicity, national origin, gender, or disability.

● State or local laws, ordinance or derived regulations (codes of regulations or administrative codes) requires a license or permit to provide the service and the agency/service provider does not have one.

Lafayette Crisis Center reserves the right to refuse or discontinue listings for organizations, which are under investigation for any type of wrongdoing. Organizations will be "suspended" from use by means of removing keywords and taxonomy references. In the event they are cleared of suspicion, they will be reinstated by having keywords and taxonomy references restored. If they are found to be guilty of wrongdoing, the agency and program listing will be removed from the database.

APPEAL PROCESS

An organization may appeal an exclusion decision by submitting a written statement to the Lafayette Crisis Center, 1244 N. 15th St., Lafayette, IN 47904. The written statement should include a justification referencing the Inclusion/Exclusion Policy of the Lafayette Crisis Center, be dated, include the name, address, telephone numbers and signature of the appealing organization.

The Lafayette Crisis Center Information & Referral Specialist and Executive Director will review the appeal and make a decision. The appealing organization will be informed of the decision within 30 days/weeks.

If the appealing organization wishes to continue the appeal, they must notify the Lafayette Crisis Center Executive Director in writing within 30 days. The director will review this appeal with the Planning/Budget Committee of the Board of Directors and notify the appealing organization within 90 days of their decision.

Approved by Crisis Center Town Hall - May 6, 2003

Approved by Crisis Center Board of Directors - May 29, 2003

http://www.lafayettecrisiscenter.org/InclusionPolicy.htm

Appendix F
MinnesotaHelp.Info
Inclusion/Exclusion Policy

MinnesotaHelp.info

Inclusion / Exclusion Criteria

MinnesotaHelp.info is the State of Minnesota's online access point for information about health and human service agencies and programs. Citizens can search the database any day or any time from the convenience of their own home. The services are organized by a geographic location and by topics. Consumers can locate general information for families and children and in depth information for seniors and caregivers. Soon the online database will include in depth information for persons with disabilities, HIV/AIDS, chemical health problems, and mental illness.

The MinnesotaHelp.info web site was developed cooperatively by the Minnesota Board on Aging and the Department of Human Services. The development of the web site was based on recommendations from the Long-Term Care Task Force, a tri-partisan task force that developed a broad set of recommendations related to long-term care reform in Minnesota. As a result of those recommendations, the 2001 Minnesota legislature supported an improved information and assistance network to provide choices about long-term care options for older Minnesotans and their caregivers. In an effort to build upon existing systems and leverage additional resources, the Minnesota Board on Aging partnered with a wide-range of partners in effort to get make an improved long-term care database available for seniors. One of the major partners included the 87 Minnesota human service agencies located in the counties.

The Minnesota Board on Aging (MBA) is the gateway to services for seniors and their families. MBA listens to senior concerns, researches solutions, and proposes policy to address the needs of older Minnesotans. In addition as the State Unit on Aging, MBA administers funds from the Older Americans Act that provides a spectrum of services to seniors, including Senior LinkAge Line® (SLL). The SLL is a free telephone information and assistance (I&A) service that makes it easy for seniors and their families to find community services. The MBA is also the designated State Health Insurance Assistance Program (SHIP).

First established in 1956, the MBA is one of the pioneers in the field of aging. It works closely with its Area Agencies on Aging, comprised of 12 regional agencies that provide direct I&A service through the Senior LinkAge Line®. The Governor appoints the Board's 25 members. The Board is housed within the Department of Human Services and staff is part of the Aging Initiative-Continuing Care Administration.

The Department of Human Services including the Disability Services Division (DSD) in the Continuing Care Administration and Children and Family Services (CFS) is actively involved in the resources for persons with disabilities and families and children's sites in MinnesotaHelp.info.

DSD defines and implements statewide policy to ensure that a range of services is available to Minnesotans with disabilities. A primary goal of DSD is to promote independent living for people with disabilities by funding or providing a broad range of residential care and social services close to home communities instead of in institutionalized settings. A key element to promoting independent living in communities is being able to access information about services available. The database will act as the

foundation for development of integrated information and assistance networks for persons with disabilities. CFS helps keep children safe and provides families with supports to care for their children. It also helps families and individuals transition to work and economic stability.

The Minnesota counties are represented by Coordinated Home Services of Hennepin County. Coordinated Home Services is a joint effort of the Children, Family, and Adult Services Department and the Community Health Department of Hennepin County. Its mission is to connect senior citizens and persons with disabilities to resources that will help them live as independently as possible.

To provide a consumer friendly and useful database, criteria were developed to determine which agencies and programs could be included in the database. The inclusion/exclusion policy was developed using feedback from consumers, professionals, planners, experienced database managers, and policy makers.

Inclusion

In order to provide objective data to consumers to aid in making informed choices, the database will include agencies that provide assistance for the general public.

1. Government and not-for-profit agencies and programs that provide assistance for the general public. These include federal, state, and municipal governments as well as non-profits designated as 401c3 incorporations.
2. Agencies and programs that are tax-exempt or do not charge fees.
3. Housing and facility establishments, medical related agencies, home care providers, whether for-profit, commercial, private, governmental, or not-for-profit, not under investigation by regulatory entities.
4. Professional organizations and trade associations that do customized referral to private persons will be included. These include the Bar Association, the various State Boards that license professionals (Medical Practice, Psychologists, Social Workers, Nurses, etc.), and other agencies that provide listings of private providers.
5. Agencies and providers certified to accept Medicaid (Medical Assistance) Medicare or any Medicaid waiver program including for-profit, commercial or private organizations.
6. Agencies and programs that are under a county contract to provide services.
7. National agencies and trade associations
8. Agencies and Providers who provide a fee for services or case management approaches to service delivery that address the community social welfare, long-term care or chronic care needs of the citizens of Minnesota.
9. For-profit, commercial, or private organizations that don't fall into one of the categories above:
   a. Related to maintaining someone in their home and independent as commonly understood;
   b. Lack of comparable services from not-for-profit;
   c. Degree of need for the services.

Exclusion

1. The Minnesota Board on Aging reserves the right to exclude any agency.
2. In general private practitioners or medical doctors except as may be necessary under inclusion criteria, are excluded.
3. Any agency that knowingly or unknowingly discriminates or denies services based on age, gender, race, religion, disability, or sexual orientation as covered in the Minnesota Human Rights Act and enforced by the Minnesota Department of Human Rights.

4. Agencies that have been found in violation of municipal, state, or federal laws or regulations and have been excluded from providing service under the requisite licensure.

Disclaimer

Disclaimer from the Minnesota Board on Aging (MBA) and Department of Human Services (DHS) and other MinnesotaHelp.info sponsors: References and resources from this web site or from any of the information services provided by agencies or providers in this database including any entities, products, services or information does not constitute an endorsement or recommendation by the MBA or any of the sponsors of this web site. The sponsors of the MinnesotaHelp.info web site are not responsible for the contents of any resource information or links referenced by the agencies listed on this website. Although our pages include data and links to sites including or referencing collections of information, the sponsors do not endorse ANY specific products or services provided by public or private organizations. By using this site, the user takes full responsibility to research the services listed for further eligibility or use information. In order to be included in this website, the sponsors have adopted an *inclusion/exclusion policy*. Any questions about content, resource listings, page links or the policy should be directed to the MinnesotaHelp.info data manager at *providerupdates@housinglink.org.*

Appendix G
Just1Call and 2-1-1 of Mecklenburg County, North Carolina
Volunteer Job Description Form

VOLUNTEER JOB DESCRIPTION FORM

Program / Agency Name   _____

Program Address

City, State, Zip   _____

Volunteer Coordinator _____

Phone (____)   _____ *Fax (____)* _____

***** A separate form must be submitted for each job title. *****

JOB TITLE   _____

AGENCY PURPOSE (Briefly describe the mission of your agency.)

_____
_____
_____

TARGET POPULATION (Who will the volunteer be serving?)

_____

DESCRIPTION (Describe what the volunteer will be doing.)

_____
_____
_____

REQUIREMENTS (Describe knowledge, skills, abilities and other requirements, i.e. driver's license, minimum age or education that are necessary for this position.)

_____

_____

_____

_____

TIME COMMITMENT (How many hours are required each week/month for this position?)

_____

Appendix H

Multnomah County, Oregon

Aging and Disability Services

Inclusion/Exclusion Policy

MULTNOMAH COUNTY OREGON

AGING AND DISABILITY SERVICES	BOARD OF COUNTY COMMISSIONERS	
AREA AGENCY ON AGING BOARD	DIANE LINN	CHAIR OF THE
421 SW 6TH AVE STE 300 COMMISSIONER	MARIA ROJO DE STEFFEY	DISTRICT 1
PORTLAND, OREGON 97204-1622 COMMISSIONER	SERENA CRUZ	DISTRICT 2
HELPLINE: (503) 988-3646 ADMINISTRATION: (503) 988-3620 COMMISSIONER	LISA NAITO	DISTRICT 3
TTY: (503) 988-3683 FAX: (503) 988-3656 COMMISSIONER	LONNIE ROBERTS	DISTRICT 4

Multnomah County Aging and Disability Services (ADS)

DATABASE INCLUSION/EXCLUSION POLICY

Purpose:

To establish a set of standards consistent with the Alliance of Information & Referral Systems (AIRS) Standards for Professional Information and Referral Services, 4th Edition, Section II, Standard 5, for providing information. These standards will define the agency's inclusion/exclusion criteria with regard to participation in the ADS database of agency and program resources.

Policy:

ADS maintains a database that contains information about services for seniors and persons with disabilities, which will enhance the quality of individual and community life. The database will be used to assist callers and will be the basis for providing information to our website and Oregon 211.

General Terms of Inclusion:

Overall emphasis will be placed on agencies that provide a health or human service for residents of Multnomah County. Special emphasis will be focused on services specifically targeted to the county's senior and disabled population. All agencies or providers must meet licensing standards if operating in a service field where such standards are known to exist. Where licensing standards do not exist, an agency or provider must operate in a

manner consistent with the implied standards of their field of service. The agency or provider must have been in existence for at least six months.

Inclusion preference will be extended to non-profits or governmental agencies that provide, coordinate, and advocate for health and human services. If a demonstrated need is not being met sufficiently by the non-profit sector, a for-profit may be included. Preference will be given to those for-profit service providers who offer a sliding-scale or low cost fee, or perform pro-bono services. Any for-profit listed must have as its primary goal the resolution of a human service need and operate in accordance with the regulatory guidelines applicable to its field. Listing preference will be given to those for-profits registered with a regulatory organization, such as the Better Business Bureau. A grievance procedure has been developed to address the issue of a challenge to a business's exclusion determination. Inclusion in the database does not guarantee referrals from Multnomah County Aging and Disability Services.

Exclusion guidelines**:**

Organizations will be excluded under the following circumstances:

- Agencies that violate federal, state, or local laws or regulations
- Unlicensed agencies that operate in an industry where licensing standards exist
- Agencies that knowingly or unknowingly discriminate or deny services based on age, gender, race, religion, disability, or sexual orientation
- Agencies which have three complaints within the previous 12 months filed against them by the Better Business Bureau, the Financial Fraud Unit of the Oregon Department of Justice, the agency which regulates the given industry, and/or the professional association that monitor the given profession, if any.

Inclusion Procedure**:**

To be included in the database, the following procedures will be followed:

Agencies will complete the Agency and Program Information Forms and attach additional information as applicable. Completed applications will be reviewed by the ADS Helpline staff for accuracy and completeness prior to acceptance. Following review and acceptance the agency and program information will be added to the database. Information will be updated yearly by mail, and will include checking of current telephone numbers, addresses, contact persons, and services available.   In addition, complaint histories (see above) with appropriate agencies will be verified. Non-compliance with our inclusion process is grounds for exclusion.

Appendix I
Info Line of Summit County, Ohio
Inclusion/Exclusion Criteria and
Telephone Reassurance Service Notice of
Privacy Practices

INFO*LINE*

Information & Referral, Senior Information & Referral, Emergency Services

Chapter TM-7.D

Inclusion/Exclusion Criteria

Date of Last Revision: October 6, 1999

Introduction

It is the function of Info Line to provide information about and referrals to a broad range of human service agencies throughout the County of Summit. It is the intent of the program that specialists will provide as much information as possible to individuals who call to enable them to make an informed decision about which of the available resources may best meet their needs. While Info Line specialists will strive to give the most accurate and appropriate information and/or referrals possible, Info Line is not responsible for the quality of service delivered by any agency to which a caller is referred. Specialists are to refer to available agencies, not to recommend one over another.

It shall be Info Line's practice to maintain as comprehensive a file as possible of agencies and programs whose services are directed toward the solution of human problems.

Agencies Included in the Resource File

A. Non-profit agencies providing a community service.

B. Organizations (such as churches, social clubs) which offer a service to the community at large, not just their own members.

C. Proprietary organizations which offer services in the areas of health, mental health, recreation, education, financial, legal, home maintenance, arts and culture, to the general public.

D. Self-help/support groups.

E. Elected representatives (federal, state, local)

F. Hospitals, health clinics, intermediate care homes.

G. Organizations outside Summit County which provide a service not available locally.

H. Professional organizations (especially those organizations in the social services field). These would include:

   1. Counseling/Psychiatry

   2. Medical

   3. Dental

   4. Legal

I. Advocacy groups.

Agencies Excluded from the Resource File

A. Services available only to members of a certain group or club (i.e. counseling available to a church's parishioners only).

B. Illegal services; including agencies which deny service on the basis of color, race, sexual orientation, etc.

Availability of Standards

Where licensing standards for a given field of service are known to exist, only those agencies that meet these standards may be included in the file. Agencies will be requested to send copies of their licensing with their application for inclusion in the resource listing.

Non-Availability of Standards

Where licensing standards are not known to exist, Info Line will use the following guidelines to establish the validity of any agency's service.

A. evidence of an established service site

B. demonstrated provision of service for a period of at least six months (thereby excluding agencies of a temporary nature, i.e. support groups for Desert Storm, natural disaster support groups, etc. These would be included in a temporary file).

Validation Procedures

Info Line will use one or more of the following means in the validation process:

A. Site visit and face-to-face interview.

B. References from clients or affiliated professionals.

C. Consultation with other agencies in the same field of service or geographic proximity.

D. Check with local law enforcement and/or consumer complaints agencies.

Informing Excluded Providers of Status and Options

A. If an agency does not meet the criteria for inclusion in the resource file, the Resource Coordinator should inform the agency by phone.

B. If there is a challenge to the decision of exclusion, a meeting with the Program Supervisor can be arranged to explain the reasons for the exclusion.

C. If still not satisfied, a meeting with the Executive Director would be the next step, followed by a review by the Board of Trustees.

INFO LINE'S TELEPHONE REASSURANCE SERVICE
NOTICE OF PRIVACY PRACTICES

Effective Date of Notice: April 14, 2003

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

If you have any questions about this notice please contact:

Mary A. Raitano, Manager, Access Services at 330-374-0333.

Info Line's Telephone Reassurance Service is required by law to take reasonable steps to ensure the privacy of your personally identifiable health information. This notice describes how we protect the personal health information that we have about you which relates to your Telephone Reassurance service and how we may use and disclose this information. This notice also describes your rights with respect to your personal health information and how you can exercise those rights. More specifically, this notice is intended to inform you about:

- Info Line's uses and disclosures of Protected Health Information (PHI);
- Your privacy rights with respect to your PHI;
- Info Line's duties with respect to your PHI;
- Your right to file a complaint with Info Line and to the Secretary of the U.S. Department of Health and Human Services; and
- The person or office to contact for further information about Info Line's privacy practices.

Please read this notice carefully.

I. Uses and Disclosures of PHI.

We understand that the health information that we have about you is personal. Therefore, we protect this information from inappropriate use or disclosure. Our employees are required to keep your information confidential and to only disclose this information when necessary for treatment, our own operations or for payment, when applicable.

Treatment. We may use and disclose health information about you to provide you with the proper assistance. We may disclose this information about you to others if necessary after telephoning you.

Our Operations. We may use or disclose health information about you for our own decisions and operations.   These purposes include evaluating proper procedures, quality assurance measures and monitoring, internal audits, and responding to funding requests and requirements.

Payment. We may use and disclose health information to seek payment from third party payors for those clients whose service is paid for by someone else. We may need to give your diagnoses or health condition in order to receive payment for our service.

Treatment Alternatives. We may use and disclose health information to tell you about health-related benefits or services that may be of interest to you.

Individuals Involved in Your Care or Payment of Your Care. We may release health information about you to a family member or friend who is involved with your care.

Notification by Message. There may be times in which we attempt to reach you by telephone to discuss your personal health information or to remind you to take medications or check on you. If we do not reach you by telephone, we may leave messages regarding your personal health information on your answering machine or voice mail.

Other Uses. We may disclose your personal health information in the following circumstances if required to do so:

- When required by law;
- When required or permitted for public health activities
- When authorized or required by law to report information about abuse, neglect or domestic violence
- For health oversight activities authorized by law, such as audits, investigations, licensure or disciplinary actions and other necessary activities for oversight (for example to investigate complaints about us or to investigate Medicare or Medicaid fraud).
- For lawsuits or disputes, in response to a subpoena, discovery request or other lawful process by someone else involved in the dispute but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested
- For law enforcement purposes
- To a coroner or medical examiner if necessary to identify a deceased person or determine the cause or time of death

Except as otherwise stated in this notice, uses and disclosures will be made only with your written authorization subject to your right to revoke such authorization.

II. YOUR RIGHTS REGARDING MEDICAL INFORMATION ABOUT YOU:

You have the following rights regarding the personal health information that we maintain about you.

Right to Inspect and Copy. You have the right to inspect and copy any personal health information that is contained in your file in our office.

You will be required to submit your request to inspect and copy your records in writing to: Manager, Access Services, Info Line, Inc., 474 Grant St., Akron, OH 44311. If you request a copy of the information, we may charge a fee for the costs of copying, mailing or other supplies associated with your request.

In very limited circumstances we may deny your request to inspect and obtain a copy of your personal health information. If we do, you may request that the denial be reviewed. The review will be conducted by an individual chosen by us who was not involved in the original decision to deny your request. We will comply with the outcome of that review.

Right to Amend. You have the right to ask us to amend the personal health information that we have about you if you feel that it is incorrect or incomplete. We will periodically ask you to update your health information but we will not change our previous records without a formal request to amend.

To request an amendment to your previous records, your request must be made in writing to: Manager, Access Services, Info Line, Inc., 474 Grant St., Akron, OH 44311.

We may deny your request if it does not include a reason to support the request or if;

- It is accurate and complete;
- It was not created by us, unless the person or entity that created the health information is no longer available to make the amendment;
- It is not part of the personal health information kept by or for us; or
- It is not part of the personal health information which you would be permitted to inspect and copy.

Right to an Accounting of Disclosures.   You have the right to request an "accounting of disclosures". This is a list of disclosures we made of medical information about you. However, such accounting will not include disclosures of your heath information made: (1) for treatment, payment or health care operations; (2) to you or your representatives about your own protected health information; (3) for disclosures which you authorized; (4) to law enforcement officers, correctional institutions or for purposes of national security and (5) prior to April 14, 2003.

To request an accounting, you must submit your request in writing to Manager, Access Services, Info Line, Inc., 474 Grant St., Akron, OH 44311. Your request must state a time period and your request should state in what form you want the list (i.e. on paper, electronically, etc).   The first list that you request within a 12-month time period will be free. For additional lists, we may charge you for the costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.

Right to Request Restrictions. You have a right to request a restriction or limitation on the personal health information that we use or disclose about you for treatment, payment or health care operations, or that we disclose to someone who may be involved in your care or payment for your care like a family member or friend. For example, you could ask that we not disclose that you were a particular medication.

We are not required to agree to your request. If we do agree, we will comply with your request unless the information is needed to provide you emergency treatment.

To request a restriction, you must make your request in writing to Manager, Access Services, Info Line, Inc., 474 Grant St., Akron, OH 44311. In your request, you must tell us (1) what information you want to limit, (2) whether you want to limit our use, disclosure or both, (3) to whom you want the limits to apply (for example, disclosures to your son or daughter).

Right to Request Confidential Communications. You have the right to request that we communicate with you about your health information in a certain way or at a certain location if you tell us that communication in another manner may endanger you. For example, you can ask that we only contact you at work or by mail. To request confidential communications, you must make your request in writing to Manager, Access Services, Info Line, Inc., 474 Grant St., Akron, OH 44311. We will not ask you the reason for your request. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

Right to File a Complaint. If you believe that your privacy rights have been violated, you may file a complaint with Info Line or with the Secretary of the Department of Health and Human Services. To file a complaint with Secretary of Health and Human Services please contact Secretary of the U.S. Department of Health and Human Services, Hubert H. Humphrey Building, 200 Independence Avenue, S.W., Washington, D.C. 20201. To file a complaint with us, please contact: Mary A. Raitano, Manager, Access Services, Info Line, Inc., 474 Grant St., Akron, OH 44311. All complaints must be in writing. You will not be penalized for filing a complaint.

III. Changes to Notice

We reserve the right to change this notice at any time. We reserve the right to make the revised or changed notice effective for personal health information we already have about you as well as any personal health

information that we may receive in the future. We will post a copy of the current notice in our lobby and on our website. The notice will contain the effective date on the first page, in the top, right corner.

IV. Further Information

You have a right to a paper copy of this notice. To obtain a copy of this notice contact Info Line, Inc. 474 Grant St., Akron, OH 44311 at 330-374-0333.

Other uses and disclosures of medical information not covered by this notice or other laws will be made only with your written permission. If you provide us permission to use or disclose medical information about you, you may revoke that permission in writing at any time. If you revoke your permission, we will no longer use or disclose medical information about you for the reasons covered by your written authorization. You understand that we are unable to take back any disclosures we have already made with your permission, and that we are required to retain our records of the service we have provided you.

Appendix J

Senior Services of Seattle/King County, Washington

Inclusion/Exclusion Criteria,
Online Resource Data Base Description,
and Online Resource Database Subscription
Agreement

Senior Services

The mission of Senior Services is to support the independence of seniors. We do this by offering programs and services for older persons and their caregivers.

The purposes of the Senior Information and Assistance (I&A) resource file are to catalog community services, maintain accuracy of community information, provide information to older people, those who care for them and the public at large, and link people with needed service

The following guidelines will be used in determining whether an agency or organization may be considered eligible to be listed in the I&A Resource File.

Agencies/Programs Eligible for Inclusion

- **Nonprofit agencies which provide community services.**

- **Governmental (public) agencies** which provide social, education, or health services.

- **Self-help support groups** .

- **Community and civic advocacy** organizations.

- **Professional organizations** in the health or human services field.

- **Elected government officials** at the federal, state, and local levels representing the residents of service area.

- **Hospitals, health clinics** and long term care facilities

- **Toll-free telephone services or web sites** if they offer a social, health, or community service to residents of the service area.

- For-profit, proprietary human service agencies which are providing **services not adequately provided by the nonprofit sector**

- For-profit organizations, offering **services parallel to a nonprofit service**, to which clients are referred and fees paid by a government agency (i.e. proprietary agencies offering homemaking services to qualified clients.)

- For-profit, proprietary businesses offering **a unique or specialized service** of interest to the target population but not provided by the non-profit sector (i.e., in-home hair care or specialty clothing for adults with disabilities.)

**Agencies/Programs NOT Eligible for Inclusion in the I&A Resource Database:**

♦ **Private, for-profit** service providers **unless** they meet one or more of the specific inclusion criteria listed above.

♦ Services which are **available only to members of a certain group** or affiliation (i.e. counseling available to a church's parishioners only).

♦ **Churches** that offer no special community-based service components

♦ Any organization which promotes or delivers **illegal** services.

♦ Agencies or organizations who have been **in existence less than six months**

Senior Information and Assistance reserves the right to make the final determination as to what organizations are included in the database and may remove or exclude any organization for fraud, misrepresentation, discrimination, service non-delivery or any other reason.

Agencies or organizations that want to appeal a decision by Senior I&A regarding the inclusion or exclusion decision should follow these guidelines:

    1.Talk to the I&A Resource Data Manager to clarify program services in relation to this policy.
    2.If concerns are not resolved by step one, a written request providing rationale for the appeal or concerns must be sent to the Director of the Senior Information and Assistance Project.
    3.The Director, in consultation with the CEO of Senior Services, will make a final determination.

No endorsement or lack of endorsement of any agency/program shall be construed from its inclusion in or omission from the I&A Resource Database.
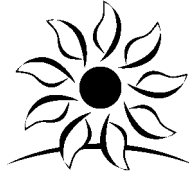
Senior Services

Senior Information and Assistance

2208 2nd Avenue, Suite 100, Seattle, WA 98121-2055

206-448-3110 FAX: 206-448-5748

www.seniorservices.org
info@seniorservices.org

On Line Resource Database

The I&A database contains information about community services for older persons and those who care for them. The easy-to-use interface enables to search for services by name, type of service and zip code. Users can link directly to any service provider that has an email or web address.

At this time, Senior Information and Assistance has two versions of the on line database available:

- The complete database of over 7,200 entries is available to case managers and other subscribers who are issued a special password to access the full database. The cost for unlimited access for one year is $125. For more information, email *MichelleE@seniorservices.org* or call Michelle Espeut at 206-727-6229.

- An abbreviated version of the database is available for the general public and contains over 2,000 records. Users can find information on senior centers, subsidized housing, adult day centers and other non-profit and governmental organizations. For information about private businesses (attorneys, guardianship services, home care, retirement facilities, nursing homes, etc.) not found in the public database, email *info@seniorservices.org* or phone 206-448-3110 or 1-800-972-9990.

- To view the database, visit our web site at *www.seniorservices.org* and select the link to "Resources".
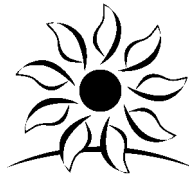
Senior Services

Senior Information and Assistance

ONLINE RESOURCE DATABASE

SUBSCRIPTION AGREEMENT

The Senior Information and Assistance database web site is designed to provide accurate and authoritative information intended for referral purposes only. While the correctness of the information is not guaranteed, Senior I&A believes it to be reliable. Inclusion of an organization does not imply endorsement, nor does omission indicate disapproval of any service. You may print, reproduce, and use the information for noncommercial, personal, or educational purposes only, provided you do not modify such information and you include any copyright notice originally included with such information and this notice in all such copies.

I agree and acknowledge that Senior Information and Assistance is not responsible for the quality of services rendered by those listed in the database web site and is in no way liable for any damages incurred by the use of said services.

I have read the terms for subscribing to the complete Senior Information and Assistance Online Resource Database, and I hereby agree to abide by them.

_____   _____

SIGNATURE   DATE

_____

NAME (Please print.)

_____   _____

TITLE   ORGANIZATION