

**California Department of Aging  
Comments and Responses on Initial CARS Specifications  
Issued December 7, 2007**

The following are CDA's responses to AAA comments generated as a result of the California Aging Reporting System (CARS) Readiness Survey. The comments received have been condensed, and combined to fit this response format. These responses will be reflected in a Second Generation CARS Specification document being released for testing purposes.

**1. Client Confidentiality**

**Comment 1:** Do not require confidential sensitive personal data on clients be transmitted from AAAs to a State system, even if the State has no access permissions to that data.

**Response:** CDA will not require actual reporting of sensitive client data (name, Social Security Number, address, etc) at this time. However, the specifications will require that your interface to CARS be designed with the capability of transmitting these data. This change means that the CARS system will not be capable of checking for de-duplication of clients at the state level. The initial CARS Specifications will be revised to reflect that the following data fields are required but reporting the data is optional at this time:

- First Name
- Last Name
- Middle Name
- Social Security Number
- Address
- City
- Client Phone Number

**Background:** Including the personal data in the draft specifications was based on a special report recommendation to CDA. In 2003, the University of California's Technical Assistance Program of the California Policy Research Center published a Special Report entitled: "Planning for a Comprehensive Database on Aging Californians: Meeting Public Policy and Research Needs for Better Information."<sup>1</sup> This report critiqued the CDA data system and offered recommended strategies to improve it. One of the recommendations was to develop a client level database that included the following minimum client profile data:

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<sup>1</sup> Special Report, Planning for a Comprehensive Database on Aging Californians: Meeting Public Policy and Research Needs for Better Information, authored by Frank W. Neuhauser, Henry E. Brady, and Jason S. Seligman, 2003.

- Name
- Social Security Number
- Zip Code
- Race and Ethnicity
- Date of Birth
- Gender
- Lives Alone
- Household Income (the exact income number)
- ADLs
- IADLs

Further, this report recommended the “consideration” of these additional client profile data:

- Marital Status
- Language Spoken at Home and English Proficiency
- Relationship of Caregiver to Care Receiver

CDA’s initial Common Dataset Primer (which was based on the UC recommendations) contained the following:

*“Does this new proposal envision collecting, storing, and analyzing private information on individuals at the State level? No. The purpose is not to have sensitive information at the State level. It is not proposed that this new state level database will store individual names, addresses, or sensitive health information. However, in order to be able to cross tabulate data across services, some form of unique identification number must be attached to individuals in order to allow client profiles information to be connected to utilization data and to control for duplication. In this proposal we are suggesting a combination of unique identifying numbers be used to control for this. This could include: A Unique Identification Number, The Client’s Home Phone Number, The Client’s Zip Code, The Client’s Date of Birth (DoB), Planning and Service Area (PSA) Number [1 to 33]. ... While the software system being designed will include a capacity or capability to use the SSN, this proposal is not proposing to use a mandatory SSN as the identifier number for clients.”*

## 2. Income Assessment

**Comment:** Replace the multiple Federal Poverty Level (FPL) variables (150% FPL, 134% FPL, etc.) on income related to FPL with the original single variable “At or Below Poverty.” The added detailed categories will be a burden on local service providers and their staff.

**Response:** CDA will remove the multiple categories from CARS and replace them with two variables only: “At or Below Poverty” (FPL) and “Above Poverty”. The Common Dataset will be modified to match.

**Background:** The U.C. Special Report recommended collecting actual household income which could then be programmed to fit certain categories for more detailed analysis. OAA/OCA clients are eligible for other non- OAA/OCA

programs and services based on a spectrum of incomes at and above the FPL. Analyses could be done on the percentages of OAA/OCA clients who might be eligible for these distinct programs. The Common Dataset, which was publicly distributed in 2005, had recommended five categories rather than the exact household income, to allow for this type of analysis. The initial CARS Specifications reflected the categories in the approved Common Dataset.

### 3. Integration Issues [Between MSSP and CARS/NAPIS]

**Comment 3.1:** Keep the use of CDA’s existing established MSSP “field values”. This will allow AAAs to integrate their systems locally (NAPIS and MSSP).

**Response:** CDA will modify both the CARS Specifications and some MSSP data elements to provide for compatibility between the two systems now. The Common Dataset will also be changed to reflect the modifications by adding missing MSSP categories and MSSPs will be required to adjust to the new standards of the Common Dataset earlier than anticipated. Follow up instructions will be issued by the CDA MSSP Branch to implement the changes that impact the MSSP elements.

Changes to both the CARS and MSSP data elements are listed below:

MSSP’s Race and Ethnicity categories will have to be updated to current Census standards as follows (left column, as required by State law, W&I Code 8310.5):

#### Differences in Race and Ethnicity:

<b>CARS (NAPIS)</b>	<b>MSSP</b>
Ethnicity (Separate from Race)	Race (Ethnicity combined w Race)
Hispanic	Hispanic
Not Hispanic	
Missing	
Race	
White	White
American Indian	American Indian
Asian	Asian/Pacific Islander (combined)
Chinese	
Japanese	
Filipino	
Korean	
Vietnamese	
Asian Indian	
Laotian	
Cambodian	
Other Asian	

Black or African American	Black
Native Hawaiian or Other Pac Islander	
Guamanian	
Hawaiian	
Samoan	
Other Pacific Islander	
Some Other Race	Other
Two or More Races	
Race Missing	

In addition, MSSP will need to align with the Common Dataset and CARS Specifications for Marital Status.

**Differences in Marital Status**

CARS	MSSP
Single (Never Married)	Single
Married	Married
Domestic Partner	
Separated	Separated
Divorced	Divorce
Widowed	Widowed
Declined to State	
Unknown	

**Comment 3.2:** Keep the use of CDA’s existing established MSSP assessments. This will allow AAAs to integrate their systems locally (NAPIS and MSSP).

**Response:** Two more ADLs (Dressing and Grooming) will be added to the Common Dataset and the CARS Specifications so they will be cross tabulated to the MSSP tool as well as CARS/NAPIS. NAPIS categories cannot be changes as they are set by the federal government.

**Differences in ADLs**

CARS	MSSP
Eating	Eating
Bathing	Bathing
Toileting	Toileting
Transferring in and out of Bed or Chair	Transferring
Walking	
No ADLs	
ADLs Missing	
	Dressing
	Grooming

In addition, CDA will add five more IADLs to CARS (Stair Climbing, Mobility Indoors, Mobility Outdoors, Housework, and Laundry) so they will be cross tabulated to the MSSP tool, as well as CARS/NAPIS. NAPIS categories cannot be changed as they are set by the federal government.

**Differences in IADLs**

Preparing Meals	Meal Preparation and Cleanup
Shopping for Personal Items	Shopping and Errands
Medication Management	Medications
Managing Money	Money Management
Using the Telephone	Telephone
Doing Heavy Housework	Housework
Doing Light Housework	
Transportation ability	Transportation
No IADLs	
IADLs Missing	
	Stair Climbing
	Mobility Indoors
	Mobility Outdoors
	Housework
	Laundry

**Comment 3.6** (*Comment number out of sequence intentionally*): The new “codes” for CARS do not match MSSP (i.e., female and males are opposite codes). Change them to match.

**Response:** Pending.

**Background:** CDA oversees the policies of both CARS and MSSP. CARS is being rolled out in phases, with NAPIS (including Title III-E Family Caregiver Support Program) being in phase one for 2008 and a later phase to include state programs. The Common Dataset and phase one of CARS are based on federal NAPIS rules, which are set by the federal Administration on Aging. CDA had planned to address MSSP compatibility later, since it is not a part of NAPIS. However, after discussion with AAA’s who have this issue, the decision was made to incorporate the necessary changes as part of the first phase specifications. This will enable AAAs that have or want to have integrated systems between CARS and MSSP to do so now.

**Comment 3.4 - Lives Alone Assessment:** Return to one variable “Lives Alone” as stated in the Common Dataset. Eliminate the detailed breakdown.

**Response:** CARS will include only the one variable, “Lives Alone” and will drop the separate categories that were proposed in the initial specifications.

**Comment 3.5:** Nutritional Risk should be standardized using the existing AoA tool.

**Response:** CDA will modify the CARS specifications by removing the detailed “score” elements. The system will only reflect the number of persons determined locally to be at risk.

**Background:** Currently in California, there is no State policy in regard to specifying all AAAs and providers use the AoA tool verbatim. Instead, some AAAs chose to drop a question or replace it with another they think is more reliable, accurate, or acceptable to clients. The initial CARS Specifications would have required all AAAs to use the original Nutritional Risk tool only.

## **7. Implementation**

**Comment:** Begin actual collection of data beginning of State Fiscal Year 2008-09, which would be July 1, 2008.

**Response:** The effective date for the implementation of CARS (NAPIS) specifications has been changed to begin actual collection of newly required data elements on July 1, 2008, for Fiscal Year 2008-09. Final Specifications are projected to be launched no later than December 31, 2007, providing six month’s advance notice so AAAs can prepare to submit data in a format that meets requirements.