

# Older Americans Act Performance System Reporting: Variance Analysis Guidance



Unlike the Ombudsman Reporting Tool (ORT), the Older Americans Act Performance System (OAAPS) includes an “Explanation of Variances” section that requires a review of data variances and explanation of the variances prior to submitting your report to the Administration for Community Living (ACL). This Variance Analysis Guidance shares tips, resource materials, OAAPS references, and examples to assist State Long-Term Care Ombudsmen (Ombudsmen) in explaining data variances in OAAPS. The goal of this guide is to assist Ombudsmen in submitting a comprehensive report that demonstrates that they have completed a thorough evaluation of data variances and provided explanations of data variances identified in OAAPS.

## Key Points

- Once data is validated, the report must be checked for variances and identified variances must be explained.
- Variances are calculated for the current reporting cycle for a data field that is +/- 10% compared to the same data field in the previous reporting cycle for all components except for “number of volunteer representatives of the Office” which has a +/- 25% variance threshold.
- Variances are generated by OAAPS and your responses to variances will be submitted through OAAPS. You are less likely to receive a call or email from an ACL reviewer inquiring about variances as correspondence regarding variances will occur within OAAPS.
- Where a variance is identified, you may check the box for “no significant factors” if it is appropriate to do so. Use the option of “no significant factors” judiciously. ACL reviewers may still request explanations if they need more information or clarification even if you have checked that there are “no significant factors.”
- ACL has performed a crosswalk of the National Ombudsman Reporting Systems (NORS) data from prior years, and as applicable, from the Ombudsman Reporting Tool (ORT). The crosswalk is pre-loaded into OAAPS.

## Tips

- Variance explanations are to be complete, accurate, and internally consistent.
- Explanations should be clear and plausible. Explain the **Why** and **What** that may account for variances.
- Review **Section 4.2.3 Step 3: Identify/Explain Variances** (starting on page 97) of the [Long-Term Care Ombudsman Program Title VII User Guide](#) that explains how Ombudsmen identify and explain variances.
- Read **Section 4.3.2.2 Review State’s Variances** (starting on page 111) of the [Long-Term Care Ombudsman Program Title VII User Guide](#) to become familiar with what ACL considers while reviewing your variance explanations.
- Review the [Quick Reference Guide: Analysis Reports Detailed Descriptions: Title VII](#) for descriptions of predefined Analysis Reports that help users review and compare data at the state, regional, and national level.
- Within each component, there may be more than one data field requiring a variance explanation. In your narrative, identify each variance separately and provide an explanation for each. If the explanation is the same for more than one data field where a variance explanation is required, you can refer to the other explanation without repeating it.

## Factors That May Contribute to Variances Include:

- Financial decreases/increases, possibly in targeted funds.
- Staffing/volunteer changes in numbers, experience, or training.
- Closure of a facility, or facilities, with a history of significant problems.
- Changes in Ombudsman program goals at the state and/or local level.
- Data entry issues (underreporting, duplication, new computer system, typos).
- Transition to OAAPS and uploading of cases/complaints indicates that there were errors in the previous reporting year.
- COVID-19 likely resulted in very few, or perhaps zero, facilities with routine access visits in all four quarters.

## Reminders for the Variance Explanation Process in OAAPS

The screenshots below are provided as examples to demonstrate how OAAPS guides you through the variance explanation process. Refer to the [Long-Term Care Ombudsman Program Title VII User Guide](#) and other OAAPS technical resources for more details regarding the entire system.

OAAPS will guide you through this process by highlighting in yellow where variance explanations are required.

### Ombudsman Program Activities

Variance Explanations Required

Data Field	2018	2019	% Variance	No significant factors identified
Information and assistance to individuals	40,588	9,954	<b>-75.5%</b>	<input type="checkbox"/>
Community education	239	218	-8.8%	

Please provide an explanation for each difference highlighted

Mark as complete

0 of 3400 characters



You will need to click on the plus sign (+) for each section and address each data field on the list where variance explanations are required (see highlighted plus sign in the screenshot below).

## Explanation of Variances - Cases and Complaints

Expand all | Collapse all

-  **+ Cases by Facility or setting** Variance Explanations Required
- + Complaints by Complainant Type** Variance Explanations Required
- + Complaints by Complaint Group** Variance Explanations Required
- + Complaints by Verification Type** Variance Explanations Required
- + Complaints by Disposition** Variance Explanations Required

In the text box provided for your narrative (as in the example screenshot below), identify each variance separately, provide an explanation for each, and check the box “Mark as complete.” If the explanation is the same for more than one variance, you can refer to that explanation instead of repeating it. Later in this resource, we provide examples of variance explanations under different scenarios for your consideration and review.

### Explanation of Variances - Cases and Complaints

Expand all | Collapse all

- Cases by Facility or setting
! Variance Explanations Required

Facility or setting	2018	2019	% Variance	No significant factors identified
Nursing Facilities	1,422	371	<span style="color: red;">!</span> -73.9%	<input type="checkbox"/>
Residential Care Community	1,094	202	<span style="color: red;">!</span> -81.5%	<input type="checkbox"/>
Setting other than Nursing Facility or Residential Care Community	13	9	<span style="color: red;">!</span> -30.8%	<input checked="" type="checkbox"/>
Total	2,529	582	<span style="color: red;">!</span> -77.0%	<input type="checkbox"/>

**Please provide an explanation for each difference highlighted**

Mark as complete
470 of 3400 characters

If a section does not require any variance explanations, “No Significant Variances” will appear in green font with a checkmark in the “Data Entry Status” heading and the user will not be able to enter information in the text box for this section. For example, NORS has new data collection elements for Ombudsman program training. In this example, there are no data fields from previous years to compare, so the system indicates no significant variances. In the example screenshot below for the “Certification and Training” section, the user is not allowed to add a narrative explanation, because it is marked as complete. This will be true for other new NORS data elements such as facility visits. There will be comparative data when reporting federal fiscal year (FFY) 2021 data.

[Expand all](#) | [Collapse all](#)

- Certification and Training
✔ No Significant Variances

Data Field	2018	2019	% Variance	No significant factors identified
Certification training hours	N/A	80	N/A	
Training hours required to maintain certification	N/A	32	N/A	
Number of new individuals completing certification training	N/A	40	N/A	

**Please provide an explanation for each difference highlighted**

✔ [Mark as complete](#)
0 of 3400 characters

## Preparation Tips

Before drafting your variance explanations, users should review the following sources:

- **Review the Two-Year Comparison Report.** This report reflects data fields that will require variance explanations, allowing the user to research reasons for the variance before submitting an explanation into OAAPS.
- **Review the Multi-Year Complaint Trend Report.** This report reflects complaint data trends over a two to five-year period and can give insight into complaint, verification, and disposition variances.
- **Review each category and subset in the comparison reports.** ACL developed a crosswalk for the past 10 years of data from ORT to compare the old and revised NORS codes.
- **Review any prior NORS variance explanations provided to ACL.**
- **Review data with state staff and/or supervisors of representatives.**
- **Review NORS resource materials and ACL NORS Tables 1, 2, and 3.** Key resources such as the NORS Training materials are available on the OAAPS Reference Materials “Other Reference Materials” [page](#). NORS FAQs, webinar recordings, and resources specifically for State Ombudsmen (e.g., [NORS Table 3 Guidance](#)) are available on the [NORC website](#).

## Guidance for Explaining Variances

Variance Analysis	Tips	Narrative Examples
<p><b>Cases and Complaints</b></p> <p>Variance analysis for Cases and Complaints identifies significant variances in:</p> <ul style="list-style-type: none"> <li>• Cases by Facility or setting</li> <li>• Complaints by Complainant Type</li> <li>• Complaints by Complaint Group</li> <li>• Complaints by Verification Type</li> <li>• Complaints by Disposition</li> </ul>	<ul style="list-style-type: none"> <li>• FFY2020 is the first year in which revised NORS coding will apply. Run reports in your software to check the accuracy of coding of cases and complaints, data entry errors, etc.</li> <li>• If you have a new software program, review for any issues regarding accuracy of data entries, merger of data from old software, automated reports, etc.</li> <li>• Explain the <b>Why</b> and <b>What</b> that may account for variances.</li> </ul>	<ul style="list-style-type: none"> <li>• <i>Cases by Facility or setting</i> Our state created an Ombudsman program for individuals with intellectual and developmental disabilities during FFY 2019 reporting period. As of FFY 2020, the Long-Term Care Ombudsman program (LTCOP) is no longer responsible for providing Ombudsman services in the facilities licensed to provide residential care to individuals with intellectual disabilities. For this reason, our number of facilities served dropped from 100 to 0 which led to the decrease in cases and complaints.</li> <li>• <i>Complaints by Complainant Type</i> In prior years, representatives over-reported the Ombudsman program as the complainant because they thought it was quicker and less taxing on the residents. In FFY 2020, representatives were retrained on appropriate complainant coding. Therefore, FFY 2020 data reflects an increase in residents as the complainant and a decrease in the Ombudsman program as the complainant.</li> <li>• <i>Complaints by Complaint Group</i> We believe the increase in Complaint Category C – Admission, Transfer, Discharge, and Eviction is due to our focus on these issues in FFY 2020. We set goals to address this problem systemically and individually and worked collaboratively with hospital discharge planners, and case managers, which lead to an increase in referrals and complaints.</li> <li>• <i>Complaints by Verification Type</i> We believe the reason for the decline in verified complaints is due to in-person visit restrictions during much of FFY 2020 because of the COVID-19 pandemic. It was often challenging, if not impossible, for representatives to verify complaints without visiting residents in-person and observing the facility environment and interactions between staff and residents.</li> </ul>

Variance Analysis	Tips	Narrative Examples
<p><b>Cases and Complaints - continued</b></p>		<ul style="list-style-type: none"> <li>• <i>Complaints by Disposition</i> Similar to the decline in complaints by verification status we believe the increase in complaints with a disposition code of “withdrawn or no action needed,” is due to the COVID-19 pandemic. Without the benefits of visiting residents in-person and observing the facility environment and interactions between staff and residents, it was difficult to know if complaints were resolved to the satisfaction of the complainant. Many complaints may have been “withdrawn or no action needed” due to frustration with the complaint investigation process taking longer and representatives not being able to visit in-person and/or the family member or resident advocating for themselves.</li> </ul>

Variance Analysis	Tips	Narrative Examples
<p><b>Organizational Structure</b></p> <p>Variance analysis for Organizational Structure identifies significant variances in the number of local Ombudsman entities located in each of these agencies:</p> <ul style="list-style-type: none"> <li>• Area Agency on Aging (AAA)</li> <li>• Non-profit agency, with 501(c)(3) status</li> <li>• Legal services provider</li> <li>• Stand-alone Non-profit agency</li> <li>• Other locations</li> </ul>	<ul style="list-style-type: none"> <li>• Was there a change in local Ombudsman entities (LOEs)? Review contract agreements for LOEs for the past fiscal year.</li> <li>• Explain the <b>Why</b> and <b>What</b> that may account for variances.</li> </ul>	<ul style="list-style-type: none"> <li>• The Ombudsman revoked the status of two AAAs as local Ombudsman entities due to poor performance. The Ombudsman designated a new local Ombudsman entity and entered into a new contract with one non-profit agency, with 501(c)(3) status. This resulted in a regional reorganization and reduction in the total number of local Ombudsman entities.</li> </ul>

Variance Analysis	Tips	Narrative Examples
<p><b>Staff and Volunteers</b></p> <p>Variance analysis for Staff and Volunteers identifies significant variances in the following for both the Office of the State Ombudsman and local Ombudsman entities:</p> <ul style="list-style-type: none"> <li>• Total staff</li> <li>• Total full-time equivalent (FTE)</li> <li>• Total volunteer representatives</li> <li>• Total hours donated by volunteer representatives</li> <li>• Total other volunteers (not representatives)</li> </ul>	<ul style="list-style-type: none"> <li>• The number of employees (both full-time and part-time) of the Office of the State Ombudsman who are representatives of the Office. Must be a whole number.</li> <li>• Full-time equivalents (FTEs) are calculated by converting the weekly work hours of employees into a ratio. For example, a person who works full-time and 100% of the time with the Ombudsman Program counts as 1 FTE. A person who works full-time, but only 50% of the time with the Ombudsman Program counts as .5 FTE, and similarly, a person who works 10 hours a week and 100% of the time with the Ombudsman Program counts as .25 FTE. May not be a whole number.</li> </ul>	<ul style="list-style-type: none"> <li>• The 100% increase in the total state level volunteer representatives was due to active recruitment of volunteers for the State Office. In prior years, we did not have state level volunteer representatives. The increase of two volunteers also accounts for the increase in number of hours donated by state level volunteers. NOTE: Per this example, the increase was only two volunteers, so checking the box for “no significant factors” is also an acceptable response to the variance.</li> <li>• The variance of a 28% decrease for local Ombudsman entity staff is due to turnover and position vacancies that were not filled by the close of the federal fiscal year (September 30).</li> <li>• The variance of a 50% decrease in hours donated by local volunteer representatives is due to volunteers retiring or leaving due to health and safety concerns during the COVID-19 pandemic. The turnover of local Ombudsman entity staff negatively impacted volunteer recruitment and training.</li> </ul>

Variance Analysis	Tips	Narrative Examples
<p><b>Funds Expended</b></p> <p>Variance analysis for Funds Expended identifies significant variances in expended funds from:</p> <ul style="list-style-type: none"> <li>• Older Americans Act (OAA) Sources</li> <li>• Additional Federal Sources</li> <li>• State Sources</li> <li>• Additional Local Sources</li> <li>• All Funds Expended</li> </ul>	<ul style="list-style-type: none"> <li>• Review all budget numbers to make sure that they are correct. Check for transposed numbers.</li> <li>• Explain the <b>Why</b> and <b>What</b> that may account for variances.</li> <li>• Review Funds Expended data with staff at least three months prior to submission.</li> </ul>	<ul style="list-style-type: none"> <li>• In March 2020, the President, and our Governor, declared emergencies due to the COVID-19 pandemic. CARES Act funding was appropriated for state Long-Term Care Ombudsman programs. Our state’s allocation was \$99,000. In accordance with state policy, the program spent the CARES Act funds before the Older Americans Act (OAA) Title VII Chapter 2 Funds, resulting in carrying over Title VII, Chapter 2 funds to the next fiscal year. This accounts for the 38% decrease in Title VII, Chapter 2 funds expended.</li> <li>• “Other Federal” funds increased due to CARES Act funds, which were expended on PPE supplies and training for representatives, and technology equipment to accommodate more tele-consults with residents.</li> <li>• Due to the COVID-19 pandemic our Governor and Legislature appropriated additional one-time funding for the SLTCO program. Our allocation was \$50,000, which accounts for the increased expenditure of state funds. The state funds were spent on laptops allowing representatives to work from home.</li> <li>• A local program lost 20% of local funding due to the sunset of a time-limited tax for social services programs in one large urban county. This accounts for a decrease in our funds expended from local sources.</li> <li>• The CARES Act and state public health emergency funds resulted in increased spending compared to the previous fiscal year.</li> </ul>

Variance Analysis	Tips	Narrative Examples
<p><b>Facility</b></p> <p>Variance analysis for Facilities identifies significant variances in:</p> <ul style="list-style-type: none"> <li>• The total number of facilities.</li> <li>• The total resident capacity for both nursing facilities and residential care communities.</li> </ul>	<ul style="list-style-type: none"> <li>• Work with the licensing and certification agency in advance to inform them of the data that is needed for numbers of facilities and resident capacity of those facilities.</li> <li>• Recommend having an agreed upon date that the reports will be provided each year.</li> <li>• Ideally integrate the facility information into the Ombudsman program software. Develop routine practices to update facility and capacity count in the Ombudsman program software.</li> </ul>	<ul style="list-style-type: none"> <li>• The agency responsible for licensing RCCs had an outdated, ineffective facility database. Providers can take beds “offline” at any time and the database did not accurately track resident capacity. Our program relied on their data and did not know until this federal fiscal year that the number and capacity of RCCs reported in previous NORS submissions were not accurate. The agency has new software and the RCC report for number of facilities and resident capacity is now accurate as of September 30<sup>th</sup>.</li> </ul>

Variance Analysis	Tips	Narrative Examples
<p><b>Program Activities</b></p> <p>For FFY 2020, variance analysis for Program Activities identifies significant variances in:</p> <ul style="list-style-type: none"> <li>• Information and assistance to individuals</li> <li>• Community education</li> <li>• Nursing facilities and residential care communities that received routine access</li> </ul>	<p><b>NOTE:</b> In FFY 2020, OAAPS has not calculated a variance for many activities. In OAAPS, the variance for these activities is “N/A.” New NORS data collection on facility specific activities will occur in FFY 2021.</p>	<ul style="list-style-type: none"> <li>• Instances of providing information and assistance (I&amp;A) to individuals increased significantly in FFY 2020 due to the COVID-19 pandemic. Representatives provided more I&amp;A by phone, video calls, and e-mail due to in-person visit restrictions and requests for information from residents and family members.</li> <li>• The number of nursing facilities that received routine access were significantly reduced due to the COVID-19 pandemic. Beginning March 2020, representatives were not allowed to conduct in-person visits.</li> <li>• The number of residential care communities that received routine access were significantly reduced due to the COVID-19 pandemic. Beginning March 2020, representatives were not allowed to conduct in-person visits.</li> <li>• The number of community education events decreased because fewer events were held due to restrictions placed on the number of people attending in-person gatherings due to the COVID-19 pandemic.</li> </ul>

## Need Technical Assistance?



The Lewin Group, an ACL contractor, subcontracts with ACL’s grantee the National Ombudsman Resource Center (NORC), to provide **programmatic technical assistance**. For assistance contact [ombudcenter@theconsumervoice.org](mailto:ombudcenter@theconsumervoice.org).

ACL and ICF, the OAAPS developer, provide **system-related technical assistance** (e.g., issues uploading a file). You can receive technical assistance by using the “Contact Us” link on the bottom of the [OAAPS home page](#) to reach the help desk.

If you are not certain who to contact use the “Contact Us” link on the OAAPS home page and your request will be routed to the appropriate group.

*This project was supported, in part, by contract and PO number HHSP23332015000881-75P00119F37006, from the U.S. Administration for Community Living, Department of Health and Human Services, Washington, D.C. 20201. Grantees undertaking projects under government sponsorship are encouraged to express freely their findings and conclusions. Points of view or opinions do not, therefore, necessarily represent official Administration for Community Living policy.*