

Aging Program Directive



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18-01-04

Disposition:
Rescinds APD # 10-01-02

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Program Area: Aging Services

Origin:
Bureau of Aging Services

Contact:
Division of Older Americans Act Services
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Subject: ISSUANCE OF AGING SERVICE POLICY AND PROCEDURE MANUAL
CHAPTER VI: Caregiver Support Program

To: Pennsylvania Department of Aging
Area Agencies on Aging
Pennsylvania Association of Area Agencies on Aging
Pennsylvania Council on Aging

From: 
Teresa Osborne
Secretary

Purpose: The purpose of this Aging Program Directive (APD) is to set forth Caregiver Support Program (CSP) procedural requirements for CSP Caregivers and identify key enhancements and revisions made to the program. This APD rescinds APD #10-01-02, including all attachments and forms.

Background: The Pennsylvania Department of Aging (PDA) previously provided the Area Agencies on Aging (AAA) with programmatic information and procedural guidance for the Caregiver Support Program via Aging Program Directive (APD) #10-01-02. This APD included historical references and direction on how to administer the State and Federal components of the Family Caregiver Support Program.

The Department of Aging conducted a survey to determine the barriers, challenges and areas of concern experienced by local Area Agencies on Aging (AAA) through their administration of the Caregiver Support Program. As a result of the feedback received from the network, the department determined that the existing policies and procedures for the Caregiver Support Program required significant revision and clarification to maximize efficiencies in the program. The Bureau of Aging Services, the Pennsylvania Association of Area Agencies on Aging (P4A) and staff

from several Area Agencies on Aging volunteered to participate on a workgroup to create the new Caregiver Support Program Chapter.

The process to develop this chapter included a thorough review of the programmatic, procedural and regulatory components of the National Family Caregiver Support Program and Pennsylvania's current Caregiver Support Program, including all corresponding forms and appendices. This analysis resulted in a draft chapter, which was presented to the aforementioned workgroup for input and revision. After completion of the initial revisions, the revised draft chapter was subsequently distributed to the entire AAA Network with a designated comment period. Additional revisions were made based on comments received leading to the final version of this chapter.

The newly created Caregiver Support Program Chapter, which is part of the *Aging Service Policy and Procedure Manual*, is posted on the PDA website with links to chapter appendices and additional reference documents, allowing all users to have easy access to the information. The document can also be printed by local users. The Department will not provide hard copies of the documents.

Directives:

Chapter VI: Caregiver Support Program overview/summary of revisions include:

The Caregiver Support Program provides assistance to individuals who assume primary responsibility for provision of care for functionally dependent or disabled adults, adults with Alzheimer's Disease or other chronic dementia, children with chronic dementia, and dependent children who are related to, but not the children of, the Caregiver. The purpose of the program is to alleviate the stress associated with caregiving and support the caregiving relationship by focusing on the Caregiver's well-being. This program encourages Caregiver respite and may provide financial reimbursement for caregiving-related services and supplies. The services available through the Caregiver Support Program are not an entitlement and are subject to eligibility requirements.

The policies contained in this Chapter will apply to new CSP participants who enroll in the program as of the implementation of the Chapter. Existing CSP participants will be transitioned to the new policies at the time of their next reassessment.

The following highlights selected key revisions from each section of the Caregiver Support Program Chapter:

Section I: Program Eligibility Requirements

The primary focus of the CSP is to serve the identified Caregiver who is the eligible consumer in the program, not the Care Receiver. The Caregiver is the individual enrolled in the Social Administration Management System (SAMS).

This section identifies all eligibility requirements needed for individuals to receive services through the CSP. Caregivers must be actively involved or engaged in various aspects of care on a regular, but not necessarily daily, basis.

Caregivers and Care Receivers must be Pennsylvania residents; however, U.S. citizenship is not required. Exceptions may be made for Caregivers living in neighboring states on a case-by-case basis. The AAA shall develop a local policy and procedure for their planning and service area. Following PDA approval, the local policy shall be applied consistently for all out-of-state Caregivers.

The new chapter clearly defines all eligibility categories for Caregivers. Each category defines its requirements as to the Caregiver, Care Receiver, living arrangement, and income. In addition to the details provided in this section of the Chapter, Appendix A.1 provides a quick reference on program eligibility requirements.

In order to participate in the CSP, household income must be less than or equal to 380% of the Federal Poverty Level. Household income is defined as the total gross income of all persons living in the Care Receiver's residence, except for minor dependent students.

Caregivers and Care Receivers may receive CSP and OPTIONS Program services concurrently as long as there is no duplication of services.

Section II: Program Enrollment Requirements

This section identifies the requirements and process for enrolling individuals in the CSP, as well as the care enrollments in SAMS and the procedures for implementing wait lists.

Caregivers applying for the CSP shall:

- Be assessed using the Caregiver Assessment Tool (CAT)
- Sign the *Conditions of Participation/Certificate of Accountability Form* indicating adherence to all program requirements. Caregivers of multiple Care Receivers shall complete and sign a separate *Conditions of Participation/Certificate of Accountability Form* for each Care Receiver in their care.

Assessments

The Caregiver Assessment Tool (CAT) replaces the Needs Assessment Tool (NAT) for CSP and is used to identify and record

the needs of Caregivers who participate in the program. The CAT provides a comprehensive overview of the caregiving relationship and pinpoints where the Caregiver may need assistance. Priority for the CSP is based on the Caregiver Assessment Score (CAS) established through completion of the CAT. The CAT must be completed for all Caregivers, including Caregivers who are Grandparents and other Older Relative Caregivers of Children.

Caregivers may provide care for more than one Care Receiver at a time; however, a separate CAT must be completed for each caregiving relationship. The only exception applies to Grandparents and other Older Relative Caregivers of Children, who may have multiple Care Receivers listed on one CAT.

A Level of Care Determination (LCD) is not required for enrollment into CSP. Care Receivers are assessed with the Needs Assessment Tool-Express (NAT-E) upon enrollment of the Caregiver into the program. Completion of a NAT-E is not required for Care Receivers of Grandparents or other Older Relative Caregivers of Children.

Care Enrollments

The Caregiver is the consumer in CSP and is the individual enrolled in SAMS. There are now three care enrollments in SAMS for CSP. The applicable care enrollments for CSP are:

- CSP – State
- CSP – Federal
- CSP – Grandparenting/Other Older Relative Caregiver

Wait Lists

Only one wait list shall be maintained for CSP. The wait list shall include Caregivers awaiting enrollment into the program, Caregivers waiting for a Home Modification or Assistive Device, and Caregivers who require an increase in their care plan cost cap.

Caregivers are placed on the wait list based on their Caregiver Assessment Score (CAS) and the date of completion of the CAT. The following areas of the CAT are factored into the calculation of the CAS:

- Priority Category
- Caregiver's Well-Being
- Care Receiver's Need for Supervision

AAAs shall establish a written wait list policy that is approved by the Department's Bureau of Aging Services that outlines the AAAs process for placing and serving Caregivers from their wait list.

A contact plan for Caregivers on the wait list has been established. Caregivers shall be contacted at a minimum, as follows:

- Telephone contact – 3 months
- Reassessment – 6 months
- Telephone contact – 9 months
- Reassessment – 12 months

Section III: Caregiver Support Program Services

This section outlines the CSP services that shall be offered by the AAA to Caregivers participating in the program. All CSP services shall meet the applicable service standards for the program.

All Caregivers who receive CSP services shall be care managed and shall have Care Management as an active service in their care plan. The contact plan mentioned in Section II also applies to Caregivers receiving services.

The AAA shall develop a local policy and procedure for the timely submission, review, approval, and payment of submitted receipts and apply the procedure consistently in all cases. The AAA shall submit this local policy to the Department's Bureau of Aging Services for approval.

Reimbursement is available for funds expended by the Caregiver for ongoing expenses for services or supplies directly related and necessary to the care being provided to the Care Receiver. Caregivers may not receive reimbursement for caregiving expenses paid to a relative.

There continues to be a lifetime cap of \$2,000 per Caregiver for the purchase of a home modification or assistive device, subject to the determined reimbursement percentage.

Hearing aids are allowable on a case-by-case basis with prior approval from the Department's Bureau of Aging Services.

The following items were added to the list of non-reimbursable items:

- Mileage and gasoline for transportation-related services
- Home repairs and maintenance
- OPTIONS Program cost-share fees

Section IV: CSP Care Plans

This section outlines AAA responsibilities with respect to care plans. Care Management shall be listed as an active service in every CSP care plan.

Care Plan Cost Caps

The monthly care plan cost cap is \$200.00, however, when services above this amount are needed, the care plan cost cap may be increased up to \$500.00.

Each Caregiver is allotted only one care plan cost cap amount, regardless of the number of Care Receivers. Caregivers with multiple Care Receivers cannot receive a reimbursement benefit amount that exceeds the CSP monthly care plan cost cap.

In instances where a Caregiver or Care Receiver is receiving services in the OPTIONS Program, the CSP care plan costs do not count towards the monthly OPTIONS care plan cost cap.

Accumulation of Benefits

Caregivers are permitted and strongly encouraged to accumulate unused monthly benefits for the purchase of extended respite care or other supportive services that would allow for a longer break from caregiving responsibilities. Planned accumulation of benefits cannot exceed a period of six consecutive months. Accumulated benefits shall be earned on a monthly basis prior to use and cannot be anticipated. Accumulated benefits shall be used by June 30 of each calendar year and cannot be carried over from one fiscal year to the next.

Section V: Reimbursement Determination and Application

This section outlines how the reimbursement percentage for Caregivers receiving CSP services is determined and applied to approved expenses.

Income

Income eligibility and reimbursement percentages are based on the previous year's gross income of all members of the Care Receiver's household, with the exception of a minor or dependent student. An exception was added to allow the use of current year's income when members of the Care Receiver's household are unable to verify or produce previous year's income.

Income shall be verified by the Care Manager and a copy of all documents shall be attached to the Caregiver's record in SAMS, both initially and at annual reassessments. Caregivers are not required to have an ongoing source of income to participate in CSP. Both the countable and excludable income lists have been revised.

Determination of the Caregiver Reimbursement Percentage

The application of the sliding scale to determine the reimbursement percentage shall occur during completion of the initial CAT, annual reassessment, or when there has been a significant change in countable income that may affect the reimbursement amount.

For Caregivers with multiple Care Receivers who live in separate households, AAAs shall use the reimbursement percentage that is most beneficial to the Caregiver for all caregiving relationships.

Section VI: Administrative Requirements

This section outlines fiscal and additional administrative responsibilities of AAAs concerning the administration of the CSP.

Community Outreach Reporting

The AAA is required to enter a service delivery in SAMS as "Information Services" for all outreach activities. Examples of outreach activities include, but are not limited to, disseminating publications, conducting media campaigns and other similar strategies aimed at reaching large audiences of current or potential Caregivers. The purpose of these activities is to provide the public with information on resources and services available in their communities.

Use of Volunteers

AAAs shall make use of trained volunteers to expand the provision of available Caregiver support services. AAAs shall, whenever possible, coordinate with established volunteer organizations that have experience in providing training, placement and stipends for volunteers in community service settings.

Additional Changes:

Appendix A.1 of the Caregiver Support Program chapter contains a quick reference chart of the program's eligibility factors and applicable SAMS care enrollment. This chart is intended to be printed and used as a desk reference for care managers.

In an effort to create consistency across the AAA network, and aid in the monitoring process, the Department has added a number of specific SAMS journal entry types/titles for specific activities. These are identified throughout the CSP Chapter. In addition, Appendix D of the CSP Chapter contains additional SAMS-specific data entry requirements.

This Chapter includes the following Appendices:

- A.1 – CSP Eligibility Quick Reference Chart
- A.2 – CSP Service Standards
- C.1 – Conditions of Participation/Certificate of Accountability Form
- C.2 – CSP Self Employed/Independent Contractor Declaration Form
- C.3 – Caregiver Reimbursement for Services and Supplies Form
- C.4 – Caregiver Reimbursement for Personal Care and In-Home Respite Services Form
- D - SAMS Data Entry Requirements
- E.1 – 6 PA Code Chapter 20: Family Caregiver Support Program
- E.2 – Older Americans Act of 1965 (as amended in 2016)
- E.3 – Pennsylvania Family Caregiver Support Act of 2011
- F.1 – Acceptable Proof of PA Residency
- F.2 – CSP Reimbursement Percentage Guide
- F.3 – Resources for Caregivers of Children