

James Toews

Authorized Signature

Number: SPD-PT-05-034
Issue Date: 10/14/2005

Topic: Other

Transmitting (check the box that best applies):

- New Policy
 Policy Change
 Policy Clarification
 Executive Letter
 Administrative Rule
 Manual Update
 Other: _____

Applies to (check all that apply):

- | | |
|--|--|
| <input type="checkbox"/> All DHS employees | <input type="checkbox"/> County Mental Health Directors |
| <input checked="" type="checkbox"/> Area Agencies on Aging | <input type="checkbox"/> Health Services |
| <input type="checkbox"/> Children, Adults and Families | <input checked="" type="checkbox"/> Seniors and People with Disabilities |
| <input type="checkbox"/> County DD Program Managers | <input type="checkbox"/> Other (please specify): |

Policy/Rule Title:			
Policy/Rule Number(s):	N/A	Release No:	
Effective Date:		Expiration:	
References:			
Web Address:			

Discussion/Interpretation:

Local AAA offices have requested clarification from SPD pertaining to the Family Caregiver Support Program (FCSP) on:

1. The definition of "frail" for the population served.
2. The application of Older Americans Act (OAA) Section 373(c)(1)(B) for caregivers who are grandparents. This statute requires that care receivers require substantial assistance with two activities or daily living (ADLs) or due to cognitive impairment.
3. Are AAAs required to provide all 5 FCSP services?
 1. Information
 2. Assistance
 3. Individual counseling, support groups, and training
 4. Respite
 5. supplemental services
4. Can AAAs use excess Title III match (cash and in-kind) from other OAA programs to match the FCSP?

The US Administration on Aging (AoA) has provided the following policy clarifications:

1. The OAA Section 373(c)(1)(B), refers to the OAA, Section 102(26), which has the definition of “Frail.”

The term “frail” means, with respect to an older individual in a State, that the older individual is determined to be functionally impaired because the individual—

- (A) (i) is unable to perform at least two activities of daily living without substantial human assistance, including verbal reminding, physical cueing, or supervision: or
(ii) at the option of the State, is unable to perform at least three such activities without such assistance; or
 - (B) due to a cognitive or other mental impairment, requires substantial supervision because the individual behaves in a manner that poses a serious health or safety hazard to the individual or to another individual.
2. Section 102 (26) is not intended to apply to Section 373(c)(1)(B) as it applies to grandparents raising grandchildren. This is based on the language in (B), which states that this section applies in cases “...described in paragraph (1), is providing care to an older individual,” not grandchildren. The grandparent may receive respite and supplemental services as it relates to their caregiving responsibilities for grandchildren.
 3. The AAA are not required to provide all 5 FCSP services. However, they need to show they have assessed local capacity for all 5 service areas and developed their programs accordingly.
 4. Excess match from other Title III programs may be used to help meet the match for Title III-E as long as it is related to the purposes of Title III-E. The guidance is spelled for this in Program Instruction, AoA-PI-01-02.

Implementation/Transition Instructions:

Local area Family Caregiver Support Program staff should consider these issues when developing plans for caregivers.

Training/Communication Plan: SPD central office staff will provide technical assistance as needed.

Local/Branch Action Required: AAA managers should review this information with staff and take action as needed.

Central Office Action Required: None

Field/Stakeholder review: Yes No

If yes, reviewed by:

Filing Instructions:

If you have any questions about this policy, contact:

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