

## **Structured Family Caregiving Frequently Asked Questions for Waiver Individuals and Families**

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The purpose of this document is to share FAQs about what individuals and families can expect with Structured Family Caregiving beginning in July 2024 for the Health and Wellness (formerly Aged & Disabled), Traumatic Brain Injury (TBI), and Indiana PathWays for Aging Waivers. This FAQ is being released in along with [this guidance](#) regarding Legally Responsible Individuals, attendant care, and SFC.

FSSA is implementing the following changes with regards to Structured Family Caregiving as approved by the Centers for Medicaid and Medicaid Services (CMS) effective July 1, 2024:

- FSSA updated the waivers so that eligible individuals and their family can receive with skilled respite services outside of Structured Family Caregiving
- FSSA added waiver provisions to allow foster parents to provide SFC to foster children.

### **Receiving the Structured Family Caregiving Service**

#### **1. When can a waiver recipient who is a child start receiving the Structured Family Caregiving service on the Health and Wellness and Traumatic Brain Injury Waivers?**

- a. July 1, 2024 as approved by CMS. Families interested in receiving this service in July can start planning now with their care managers. [Please see this guidance.](#)

#### **2. When can a waiver recipient who is receiving support from a spouse start receiving the Structured Family Caregiving service on the Health and Wellness, PathWays, and Traumatic Brain Injury Waivers?**

- a. Waiver recipients whose spouse will provide Structured Family Caregiving can work with their care manager at anytime to consider including this service in their service plan. Please see [this guidance.](#)

#### **3. Who determines what level (1, 2, or 3) of Structured Family Caregiving an individual received?**

- a. The care manager based upon a needs-based assessment with one notable difference until July 1, 2024. From now through July 1, 2024, the SFC level for eligible individuals under age 18 will be determined based upon the authorized attendant care hours as of May 1, 2024:
  - i. SFC Level One: 1-20 hours/week
  - ii. SFC Level Two: 21-40 hours/week
  - iii. SFC Level Three: 41+ hours/week

More guidance is located [here](#).

#### **4. What does a “daily rate” or “per diem” mean for how Structured Family Caregiving is compensated?**

- a. FSSA pays a daily rate to the Structured Family Caregiving provider when services are delivered on that day based upon an approved service plan.
- 5. What do the caregiver coach and nursing staff at a Structured Family Caregiving provider do for a waiver member and their family?**
- a. These individuals, through occasional in-person home visits, provide person-centered and age-appropriate support to the waiver individual and their primary caregiver(s) as the caregiver assists the waiver individual with activities such as bathing, dressing, feeding, skin care, etc. The caregiver coach and nursing staff serve as a resource for training on various relevant care needs and support strategies to primary caregiver(s) based on assessed needs. The level and type of support and technical assistance offered to the principal caregiver is expected to look different and unique in each SFC household. The caregiver coach and nursing staff do NOT provide skilled care.
- 6. Can a family receiving SFC continue to provide any of the skilled tasks that were taught and directed by a physician or at discharge from hospital or health center?**
- a. SFC doesn't prohibit this and it is not considered part of the daily SFC service. For any skilled needs that have been part of discharge planning, these can be continued.
- 7. Can a waiver recipient receive Structured Family Caregiving and State Plan Home Health?**
- a. Yes, if the eligible individual qualifies for State Plan Home Health. The home health benefit requires prior authorization. There is no limitation on home health strictly due to receipt of SFC.
- 8. Can a family caregiver be paid for delivering Structured Family Caregiving on the same day the member being supported is receiving other waiver services?**
- a. Yes. A member can receive other waiver or other Medicaid services while also receiving SFC unless those are explicitly prohibited because the service is considered duplicative in nature. Members are encouraged to find additional service options to add to their SFC services.
- 9. What services cannot be received when a waiver recipient has Structured Family Caregiving?**
- a. Separate payment may not be made for home and community assistance, assisted living, attendant care or adult family care.
- 10. Where can I find a list of SFC providers?**
- a. Ask your care manager for SFC providers in your area. FSSA will also post a list to the Medicaid Strategies webpage soon.
- 11. Can Family Members/LRIs provide Medication Administration if they are the paid structured family caregiver?**
- a. Structured Family Caregiving (SFC) is not intended to replace the role of or disrupt the familial relationship in the lives of members receiving SFC services. Therefore, the administration of medication by immediate family members would be allowable as part of the typical role and responsibility of an

immediate family member. Given that SFC pays a per diem rate the medication administration would not be part of the activities and support provided by a family member paid as a structured family caregiver, but rather an activity that typically occurs between the member and immediate family. Because medication administration is not a Structured Family Caregiving service, it should not be included in documentation of Structured Family Caregiving services.

## **Respite & Structured Family Caregiving**

### **12. What is respite?**

- a. Respite is a service that allows the usual caregiver to take time away from caregiving responsibilities. Respite services can be either skilled or unskilled.

### **13. Is respite included in Structured Family Caregiver?**

- a. Respite is considered temporary relief to caregivers to provide opportunities for caregivers to take a break while ensuring the member's needs continue to be met during that relief period.
- b. Unskilled Respite is included in Structured Family Caregiving. Up to 15 days of unskilled respite care per year is included in the SFC service. A member and their caregiver should work with their chosen SFC provider to access this respite care. Effective July 1, SFC providers are to coordinate and obtain the unskilled respite care offered in this service. Skilled respite is not included in Structured Family Caregiving but can be requested as a separate waiver service for those receiving Structured Family Caregiving

### **14. What can unskilled respite do for caregivers and families?**

- a. An unskilled respite caregiver can temporarily assist a waiver member with activities of daily living such as dressing, bathing, and other similar supports while the primary caregiver(s) is away or unable to provide care for a short period of time.

### **15. How is unskilled respite care provided within SFC?**

- a. The agency provider must provide the principal caregiver up to fifteen (15) days of unskilled respite per calendar year. Funding for this respite is included in the daily rate paid to the provider agency, and these respite services must be provided by a qualified caregiver familiar with the participant's needs.

### **16. What can skilled respite do for caregivers and families?**

- c. A skilled respite caregiver can temporarily assist a waiver individual who has been determined to have skilled medical needs with activities of daily living such as dressing, bathing, feeding, and other supports while the primary caregiver(s)

is away or unable to provide care for a short period of time, and to offer the primary caregiver a break. The skilled respite will be provided by either a home health aide or nurse depending on the plan of care.

**17. How does an individual access skilled respite services on the waiver?**

- a. The individual should work with their waiver care manager to assess needs related to the respite being requested and coordinate the skilled respite services

**18. What should an individual do if the 15 days of respite included in SFC have been fully utilized and more respite is needed?**

- a. The individual and their caregiver should work with the individual's care manager to determine if the individual may qualify for support through the skilled respite waiver service.

**19. Are there situations where the primary caregiver would not receive a daily payment for SFC from the provider on days when the member and their caregiver are receiving respite?**

- a. This varies. Members and families are encouraged to research and get to know SFC providers to choose one that is most appropriate for their situation.

**20. When counting 'days' of unskilled respite in Structured Family Caregiving, is one (1) day considered to be 8 hours? Or 24 hours?**

- a. The state requires the SFC service to have at least 15 days of unskilled respite. The way in which unskilled respite time is calculated (as only used as a full day or accessed hourly, for example) depends on the SFC provider. Individuals are encouraged to inquire to prospective SFC providers how they support the unskilled respite requirement in this service.

## Home Health and Structured Family Caregiving

- 21. Can Prior Authorization (PA) Home Health services and Structured Family Caregiving be provided concurrently to a Medicaid recipient?**
  - a. Yes. A waiver recipient can be authorized to receive Structured Family Caregiving and PA for Home Health. The services can be delivered on the same day but cannot be delivered at the same time. In addition, the services cannot be delivered by the same paid caregiver.
- 22. Can an individual be both the paid principal caregiver of Structured Family Caregiving and paid to provide PA for Home Health services for the same Medicaid recipient?**
  - a. No. To be eligible for PA for Home Health services (both Nursing and Home Health Aide), an individual's primary caregiver must be unavailable to provide care for one or more reasons ([IHCP Home Health Services module](#), pg. 3). The primary caregiver cannot be unavailable so that the individual is eligible for PA for Home Health services, while also being paid to deliver those same services.
- 23. If I am the paid principal caregiver for a waiver recipient receiving Structured Family Caregiving, can another member of our household be a Home Health Aide for them, assuming they are qualified to do so?**
  - a. Yes, Structured Family Caregiving and PA for Home Health services can both be authorized as long as they are not provided by the same individual and not provided at the same moment in time.
- 24. I was told by my home health provider that I could be paid as a Home Health Aide or Nurse and be the paid caregiver under Structured Family Caregiving. What should I do?**
  - a. This is incorrect information. If you are providing Structured Family Caregiving, you need to tell your home health provider they need to help you find another home health aide or nurse. If you prefer to be paid to provide PA Home Health services as a Home Health Aide or Nurse, you need to talk with your care manager about alternatives to Structured Family Caregiving. We will be updating both the IHCP Home Health module, as well as the prior authorization and service plan review processes to reflect this policy.