



**IIIB Flexible Community Services/III E Gap/III E Respite
Frequently Asked Questions
Effective FY2025**

Below are Frequently Asked Questions for IIIB FCS, III E Gap and III E Respite services funded by AgeGuide. Please refer to the AgeGuide Service Standards for more information on the unit of service definition, eligible population definition and allowable and unallowable service activities, which are available on the AgeGuide website <https://ageguide.org/service-standards/>

Contents

Eligibility 2

Documentation Requirements 4

Maximum Costs Per Unit of Service 5

Allowable and Unallowable Service Activities 6

Eligibility

Q: Can IIIB FCS and/or IIIE Gap/Respite funds be used to assist a current Community Care Program (CCP) client?

A: Yes. IIIB FCS, IIIE Gap and IIIE Respite are available to supplement the needs and services that are not met through CCP. These services can be combined to meet the needs of a client (and their family caregiver) if appropriate and available.

Q: CCUs that are ADRN Partners are concerned about assisting Managed Care Organization (MCO) participants with IIIB FCS funding without payment. Can CCUs complete a CCC assessment and bill it as a denial for CCP services?

A: AgeGuide does not require that a CCC assessment be completed to determine eligibility for FCS services. The ADRN Partner is encouraged to refer the participant to the CCU or MCO for CCP services if it is appropriate.

ADRNPs receive ADRN Access Package funding to assist with FCS needs, provide I&A and Options Counseling according to the Notice of Grant Award. FCS Standards do allow ADRN Partners to utilize 20% of their FCS allocations to assist with administrative costs related to providing services. This is the maximum allowed administrative cost according to the Older Americans Act guidelines. The ADRN Partner can only utilize 20% of the amount of FCS used to assist participants during the fiscal year. For example: If a grantee's FCS allocation is \$10,000 and they only utilize \$5000 during the fiscal year, only \$1000 can be taken in administrative costs.

ADRN Partners are encouraged to utilize Information & Assistance or Options Counseling when assisting MCO participants with FCS funds.

Q: The IIIB FCS Standards state that when assisting with emergency utility or rent/mortgage assistance, a plan for sustainability should be considered beforehand to ensure the ongoing need to pay the expense will be met by other sources moving forward. What if a participant needs assistance, but at the time they contact us for help, they report they do not have the ability to pay for the expense in the future?

A: AgeGuide recognizes there may be extenuating circumstances when participants may not have the ability to meet future expenses for the requested need when they contact you for assistance. This should not be a barrier to providing assistance, particularly when there are no other funding sources (or programs) available to assist. AgeGuide encourages the ADRN Partner to work with the participant, for example through Options Counseling, to explore all potential options and interventions to assist, and conduct follow up with as necessary to see where additional assistance may be needed.

For example, a participant requests help paying for a water bill. They state they will continue to have difficulty paying the water bill in the future due to other monthly expenses, high rental costs and income loss in the household. The ADRN Partner works with the participant to explore more affordable housing options to free up some income to put towards bills and other expenses, which becomes part of the participant's plan for long-term stability.

Additional Eligibility Guidance for Financial Assistance Funds

AgeGuide grantees will utilize Title IIIB, IIIE and ADRD financial assistance funds to prioritize the needs of eligible populations in greatest social and economic need according to the General Services Requirements. Grantees will prioritize service delivery for needs related to health and safety, housing, and social determinants of health such as transportation, food, clothing, home/vehicle repairs and modifications, medical needs (not otherwise covered by insurance) etc. While means testing is not allowable under the OAA, it is appropriate that grantees assess an eligible client's financial situation to ensure funds are utilized in accordance with the standards and to maximize referrals to other services and supports to promote client financial stability.

Respite services should be targeted at short term, temporary respite to provide caregivers with a break and should not be used for long term support to fill unmet needs in an established care plan.

Grantees are encouraged to refer eligible clients to local money management related programs (via the aging network or other community-based programs) when needed.

Documentation Requirements

Q: What requirements need to be documented in the participant's file?

A: Please refer to the **Records and Documentation** section of the Service Standards and corresponding Instructional Video for each service. These resources are available on AgeGuide's website: <https://ageguide.org/service-standards/>

Q: The FCS Standards do not currently require a face-to-face assessment, correct?

A: Correct. Because FCS allows such a wide variety of assistance, AgeGuide identifies that some ADRN Providers receive referrals from other internal departments who may already be assessing the participant's needs. ADRN Providers are strongly encouraged to complete a face-to-face assessment with participants seeking FCS funding, however, in emergency and other situations, AgeGuide understands that this could delay the process and place the participant at risk. The ADRN Provider should document why a face-to-face meeting was not completed in the participant's file.

Q: Can AgeGuide require MCOs to show evidence/documentation of a participant's need for IIIB FCS, IIIE Gap or IIIE Respite funds?

A: The MCOs are encouraged to refer participants for potential financial assistance, however, MCOs are not required to determine the participant's eligibility or provide documentation of the participant's need for such services.

Q: If we utilize IIIE Gap and/or ADRD Gap for respite services, how do we enter this in AgingIS?

A: Any services covered under a Gap fund should be logged in AgingIS according to the Gap standards. If an organization uses Gap funding for a respite services, they will enter this service as 1 person and log 1 unit in the appropriate Gap category. We cannot capture hours of respite as units under Gap. AgeGuide would encourage grantees to keep track of hours of respite paid under Gap funds in case IDOA and/or ACL request further clarification, as this has happened previously. AgeGuide also encourages providers to minimize the usage of Gap funds as an extension of respite funding, as this

creates a disparity in understanding the actual need for respite in our region and limits access to Gap funding for other emergency and urgent health and safety needs.

The Gap and FCS unit definitions are different than how we report in AgingIS. Can you provide clarity?

This is correct. Current reporting requirements from IDOA and ACL now require AgeGuide to provide a breakdown of units and expenses in additional Gap and FCS categories. These new requirements have created a disparity in the unit definition for Gap and FCS and the reporting requirements. IDOA is in the process of updating unit definitions to ensure alignment with reporting requirements. AgeGuide will update our services standards and related materials once new definitions have been provided. In the meantime, we must comply with reporting requirements in AgingIS.

FCS and Gap Units should be counted based on the good(s) and/or service(s) purchased on behalf of the client and the applicable reporting category in AgingIS.

For example, if a client requests assistance with a rental bill, transportation, and a walker a grantee would report as follows in AgingIS:

1. 1 unit for rental assistance in Other
2. 1 unit for transportation in Access Not Reported Elsewhere
3. 1 unit for Assistive Technology

AgeGuide will calculate the units served based on reporting requirements from IDOA and ACL.

Maximum Costs Per Unit of Service

Note on Funding Caps: The funding caps (i.e. \$500 per client and waiver limits) are not guaranteed funding amounts per client. Limitations are used as guidelines for grantees in creating a service design and delivery that maximizes support for eligible populations' needs in their communities. Funding should be based on the individual needs of eligible populations and should not be "blanket" awards or "grant" awards made to clients to utilize as drawdown funds.

Q: Can the funding caps be revised to accommodate increasing costs for services?

A: Yes. Effective October 1, 2024, the following funding caps are in place for IIIB FCS, IIIE Gap, and IIIE Respite. The ADRD caps will remain the same per IDOA guidelines.

IIIB FCS and IIIE GAP: For FY25, the cap for FCS and Gap funding will remain the same, except for the following: home repair/renovation costs, rent/mortgage costs, car repairs and vehicle adaptation. Providers may use up to \$2500/person from Title III on home repairs, home renovations including ramps, rental/mortgage expense, car repairs and vehicle adaptation. All other expenses continue to be subject to the \$2000 cap.

IIIE Respite: For FY25, the cap for Respite is \$2500/person.

Allowable and Unallowable Service Activities

Q: Can IIIB FCS and/or IIIE Gap be used for car repairs?

A: Yes. AgeGuide identifies that a person's vehicle can be a key component of promoting independence and decreasing social isolation.

Q: Can IIIB FCS and/or IIIE Gap be used for moving costs in/out of the county or region?

A: Yes, if the participant will be living in a community-based setting and not a long-term care facility.

Q: Can IIIB FCS and/or IIIE Gap be used to assist individuals moving into a Long-Term Care Facility (such as a nursing home or Supportive Living Facility)?

A: No, these funds should not be used to pay for participants' moving costs to a long-term care facility. However, if there are extenuating circumstances that pose a risk to the participant's health and safety which is prompting the move to a long-term care facility, funds may be approved by AgeGuide on a case-by-case basis. Contact AgeGuide with questions.

Q: Can IIIB FCS and/or IIIE Gap be used to reimburse goods/services already purchased or incurred prior to the request, including medical bills?

A: No. It has been AgeGuide’s policy that these funds cannot be used to reimburse goods and services purchased or incurred prior to the request, including outstanding medical bills. Our recommendation is to utilize IIIB FCS and/or IIIE Gap to assist with other allowable expenses (as outlined in the standards) participants might have so they can pay for the goods/services already purchased from their own funds.

Q: Can Title IIIB, IIIE, and/or ADRD Gap be provided directly to an eligible adult for these services?

A: No. All payments under IIIB FCS, IIIE Gap and Respite and ADRD Gap should be made directly to a vendor. AgeGuide funds do not operate as “vouchers” and should not be paid directly to an eligible adult.

Q: Can IIIB FCS and/or IIIE Gap be used to pay for ongoing financial assistance, such as monthly utility bills or rental/mortgage payments?

A: These funds are intended to provide time-limited financial assistance. Funds cannot be used to pay for **ongoing** bills/fees such as monthly utility bills or ongoing assistance with rent or mortgage payments.

ADRN Partners: As stated in the *IIIB FCS Service Standards*, when assisting with emergency financial assistance, a plan for sustainability should be considered beforehand to ensure the need to pay monthly utility bills is going to be met moving forward. Staff should assist the client with identifying additional resources and benefit programs to assist them, for example LIHEAP, other local utility benefit programs, SNAP/food assistance programs, money management services, etc.

Q: Can IIIB FCS and/or IIIE Gap pay for outstanding phone or Internet bills?

A: Yes, these funds may be used to pay for one-time assistance for an outstanding phone or Internet bill if it will decrease the participant’s risk of isolation and positively impact health, safety, and well-being.

Q: Can we help a participant with the same need (such as a utility bill) this year, that we helped with the previous year?

A: AgeGuide anticipates that identical good/services will not be purchased for the same participant from year to year, however, certain situations may make it appropriate to utilize funding for a similar purchase at a later time, for example: a participant has moved to new housing and cannot afford a necessary home modification, participant has experienced a significant life event, there has been a significant change in the participant's functional status/health, etc.

Two items outlined in the *IIIB FCS Service Standards* are specifically designated as **one-time assistance** which are: Emergency Utility Assistance and Emergency Rent/Mortgage Assistance. For example, if the ADRN partner helped a client with an electric bill last year, then technically the ADRN partner cannot assist the client with their electric bill again this year. Ideally at that time, additional resources were explored to help the client budget for future needs such as applying for LIHEAP or other financial assistance programs.

Further, it is important to note that the Service Standards do not prevent ADRN/CRC Partners from assisting clients with other allowable goods or services from year to year. AgeGuide recommends working with clients to determine if they have other needs that IIIB FCS and/or IIIIE Gap can assist with financially so they can put money aside for the requested need.

If there are questions or concerns about a specific request, contact AgeGuide for assistance.

Q: Can IIIB FCS and/or IIIIE Gap be used to purchase interpretation services to assist a participant with a specific communication need?

A: These funds may be used to purchase interpretation services in extenuating circumstances when access to such services may not be readily available to assist a participant.

However, as stated in the *IIIB Information & Assistance Service Standards* and *IIIE Caregiver Resource Center Standards* (under the Access heading), in areas with a significant number of older persons who do not speak English as their principal language, ADRN and CRC Partners are required to arrange for or have the capacity to provide services in the language spoken by older persons. This may include having staff, or contractual agreements, to aid persons with Limited-English Proficiency, as well as persons with hearing or speech impairments in obtaining services. Ideally, ADRN and CRC Partners should allocate funding for interpretation services in their annual budgets.

Further, IDOA provides additional funds for translation (interpretation) services when CCUs are completing a CCC assessment. If a CCU, that is also an ADRN or Caregiver Resource Center, is completing a CCC for HDMs, they should be billing that as an assessment with translation rather than needing to use Title III funds to pay for translation during the assessment.

Q: Can IIIB FCS and/or IIIE Gap funds be used to pay for medical or health insurance co-pays or deductibles, for example co-pays for counseling services, physical therapy, medication, or Medicare deductibles?

A: No. Please refer to the Service Standards. Per IDOA, funds cannot be used to pay for medical or health insurance co-pays, fees, or deductibles.

Q: Can grant funds be used to pay for auto insurance premiums?

A: No, funds may not be used to pay for auto insurance premiums. In this situation, AgeGuide recommends working with participants to determine if they have other needs that grant funds can assist with financially so they can put money aside for the insurance premium.

Q: Can IIIB FCS and/or IIIE Gap funds be used to pay for housing related costs such as Homeowners Association (HOA) fees or property taxes?

A: Beginning in FY24, IIIB FCS and IIIE Gap may be used to pay for property taxes in emergency situations. However, these funds cannot be used to pay for HOA fees. In this situation, AgeGuide recommends working with participants to determine if they have other needs that IIIB FCS and/or IIIE Gap can assist with financially so they can put money aside for HOA fees.

Q: We are receiving requests to pay for homeowners insurance deductibles so the insurance policy will pay for needed home repairs due to storm or other damage (roof repairs, water damage, and fallen trees when the city or township will not remove). We have also received requests to pay for car insurance deductibles so the policy can pay for a necessary car repair. Are these types of insurance deductibles allowable or should we look for other areas to assist the client?

A: Yes, IIIB FCS and/or IIIE Gap may be used to pay for homeowners insurance deductibles and car insurance deductibles because the ADRN and/or CRC would pay the deductible amount directly to the company handling the repair.

Q: Can we use IIIB FCS and/or IIIE Gap funds to help pay for home modifications or repairs, such as ramps, when participants are renting their home?

A: Yes, funds may be used to help pay for home modifications/repairs to rental units. AgeGuide provides the following guidance:

- It must be confirmed that the property owner/landlord is not required to pay for the home modification or repair. For more information, see the below section *“Who Pays for Reasonable Modifications?”*
- If there are questions or concerns about the landlord’s responsibility to obtain the necessary modification/repair, contact the local Fair Housing organization and/or Prairie State Legal Services office for assistance.
 - Fair Housing
 - **Hope Fair Housing Center** (DuPage, Grundy, Kane, Kendall, Lake, McHenry, and a portion of Will County): <https://hopefair.org/>
 - **South Suburban Housing Center** (Kankakee County & Northeastern Will County): <https://southsuburbanhousingcenter.org/>
 - Prairie State Legal Services - <https://pslegal.org/>

- If it confirmed that the landlord is not responsible for paying, the client (and/or representative) must have the **expressed written consent from the landlord** to repair or modify the rental unit. Here are some options to obtain written consent from the landlord:
 - Require a signed and notarized letter from the landlord
 - Require the landlord to sign the *Landlord/Mortgage Holder Approval form* supplied by AgeGuide. If using this form, it must be signed and witnessed by a staff member at the ADRN/CRC. This will document that any modifications to the client's home has been discussed with the landlord/mortgage holder and approved prior to any work being performed.
- A copy of written consent from the landlord must be kept in the client's file.

Who Pays for Reasonable Modifications?

Often, it is the tenant's responsibility to pay for changes to their individual unit. However, sometimes the landlord will agree to and/or be required by law to pay for the modification. Here are two examples.

1.) The Fair Housing Amendments Act of 1988 (FHAA) states that covered multifamily dwellings built after March 13, 1991 must meet certain accessibility and adaptability standards. If any of the structural changes needed by the tenant are ones that should have been included in the unit or public area when constructed, then the housing provider may be responsible for paying for those requested structural changes.

2.) If the housing provider receives federal financial assistance, the housing provider must pay for the modification under Section 504 of the Rehabilitation Act, unless doing so would impose an undue burden. However, if a resident has a tenant-based Housing Choice Voucher ("Section 8" voucher), Section 504 does not apply and the resident has to pay for the modification.

References:

Illinois Department of Human Rights, *Reasonable Accommodations and Modifications: A Guide for Housing Professionals*.

<https://dhr.illinois.gov/content/dam/soi/en/web/dhr/publications/documents/idhr-reasonable-accommodations-and-modifications-2-0.pdf>

USC Leonard Davis School of Gerontology, *Home Modifications for Renters with Disabilities: Special Considerations*. https://homemods.org/wp-content/uploads/2022/03/FactSheet_Renters.Final_.pdf

Illinois Legal Aid Online, *Fair Housing Laws for Individuals with Disabilities Basics*
<https://www.illinoislegalaid.org/legal-information/fair-housing-laws-individuals-disabilities-basics>