

**ADMINISTRATIVE RULES PUBLIC COMMENT
IOWA FAMILY CAREGIVER SUPPORT – CHAPTER 321-14
JULY 2-23, 2008**

RULE CITATION	COMMENTS	SUBMITTED BY	DEPARTMENT RESPONSE
<p>321—14.7(231,249H) Quality standards. 14.7(1) AAA staff requirements. b. Employ or contract for a designated family caregiver specialist with the following demonstrated competencies: (1) A bachelor’s degree in the human services field or an associate’s degree in the human services field and two years of employment in information and referral positions, which may be substituted for a bachelor’s degree.</p>	<p>Note: These comments do not have the correct rule number cite as published in the notice of intended action. The correct cite is shown in column one.</p> <p>321-14.6(231) Quality Standards 1. A bachelor's degree in a human services field; or a human services associate's degree .</p> <p>Question: Are current staff going to be grand fathered in? If yes, please include in language.</p>	<p>Seneca Area Agency on Aging</p>	<p>Yes, we will grandfather in existing staff, but they must meet the requirements in 321 -- 14.7(2) Certification</p> <p>See response to 14.7(2) below.</p>
<p>14.7(2) Certification. The family caregiver specialist shall possess a Certification for Information and Referral Specialists in Aging (CIRS-A) from the Alliance of Information and Referral Systems at the time of employment or shall agree to obtain such certification within six months of employment.</p>	<p>14.6(2) The Family Caregiver Specialist shall possess a Certification for Information and Referral Specialist in Aging (AIRS-A) from the Alliance of Information and Referral Systems at the time of employment or shall agree to obtain such certification with 6 months of the employment date.</p> <p>From the AIRS website it states: "Who can become AIRS</p>	<p>Iowa Association of Area Agencies on Aging (I4A)</p>	<p>Revise 14.7(2) to: Certification. The family caregiver specialist shall possess a Certification for Information and Referral Specialists in Aging (CIRS-A) from the Alliance of Information and Referral Systems at the time of employment or shall obtain such certification within 6 months of employment. Family Caregiver Specialists in employment on March 1, 2009 must possess a CIRS-A within six months of the</p>

	<p>Certified? Candidates may apply to take the certification examination once they are eligible. Eligibility is based on I&R and equivalent experience combined with educational background. . At least 1 year of employment in I&R for applicants with a Bachelors or higher degree . 2 years of employment in I&R for applicants with an Associates/Community College degree .3 years of employment in I&R for applicants with a High School diploma or GED."</p> <p>This will limit the number of applicants who are eligible for this position.</p> <p>We request that the section mirror or at least not be more restrictive than the AIRS requirement.</p>		<p>date the specialist meets eligibility requirements for certification:</p> <ol style="list-style-type: none"> 1. At least 1 year of employment in I&R for specialists with a Bachelors or higher degree 2. 2 years of employment in I&R for specialists with an Associates/Community College degree 3. 3 years of employment in I&R for specialists with a High School diploma or GED <p>Part time staff and volunteers are required to be CIRS-A.</p>
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<p>14.7(1) AAA staff requirements. Each AAA shall:</p> <p>a. Assess the full time equivalent for its family caregiver program, considering current funding levels among other factors, and shall staff the program to best meet the needs of the service delivery area.</p>	<p>Section 14.6(1): It is unclear as to exactly what this section is requiring. What does “assess” mean? Does this section require an area agency to have a full time person as Caregiver Specialist?</p>	<p>Iowa Association of Area Agencies on Aging (I4A)</p>	<p>Change assess to evaluate</p> <p>Only if needed – as stated, the agency shall staff the program to best meet the needs of the service delivery area.</p>
<p>14.6(2) If the applicant does not have the certification required in subparagraph (1), three years of employment in an information and referral positions is required.</p>	<p>Section 14.6(2) Do part-time Family Caregiver specialists have to be certified also? We would not recommend that requirement.</p>	<p>Iowa Association of Area Agencies on Aging (I4A)</p>	<p>Yes – The purpose of the CIRS-A certification requirement is to ensure quality service. Whether the FCG specialist is full or part time is unrelated.</p>
<p>14.2 Definitions “Family caregiver means an adult, selected by the consumer or the consumer’s legal representative, who is an informal provider of in-home and community care to an individual.</p>	<p>Specify older individual (60+)</p>	<p>Administration on Aging</p>	<p>Add the word “older” and (60+) to the text.</p>

<p>14.3 Eligibility for services 2. A person of any age with Alzheimer’s disease or a related disorder with neurological and organic brain dysfunction; or</p>	<p>Add at the end of the paragraph: “and a grandparent or relative caregiver must be providing informal in-home or community care to;</p> <ol style="list-style-type: none"> 1. a child or children under age 18, or 2. an adult child or children aged 19 through 59 with a disability 	<p>Administration on Aging</p>	<p>Agreed. Appropriate changes should be incorporated to clarify eligibility criteria.</p>
<p>14.4 Priorities for service.</p>	<p>AoA suggested changes utilizing OAA 2006 references.</p>	<p>Administration on Aging</p>	<p>Agreed. Use OAA priority definitions as submitted by AoA.</p>
<p>14.6(5)a Supplemental Services Chore services such as heavy housework, yard work or sidewalk maintenance.</p>	<p>Note: These comments do not have the correct rule number cite as published in the notice of intended action. The correct cite is shown in column one.</p> <p>14.5(e) 1 This item addresses “chore” service but at the end of the sentence “legal assistance” is listed. Legal assistance is listed by itself as item 14.5(e)3. It does not seem that “legal assistance” should be listed under 14.5(e)1.</p>	<p>Iowa Association of Area Agencies on Aging (I4A)</p>	<p>Not an issue in published notice.</p>
<p>14.6(5)e Assisted transportation using regular vehicles which may include provision of assistance, including an escort, to a person with physical or cognitive difficulties.</p>	<p>14.5(e) 5 This item defines “assisted transportation” as using regular vehicles. Does this exclude Special Transit Vans and if yes, why?</p>	<p>Iowa Association of Area Agencies on Aging (I4A)</p>	<p>Remove “using regular vehicles.”</p>

<p>14.7(2) Certification The family caregiver specialist shall possess a Certification for Information and Referral Specialist in Aging (CIRS-A) from the Alliance of Information and Referral Systems at the time of employment or shall agree to obtain such certification within six months of employment.</p>	<p>16.6(2) If an agency’s Information and Assistance Specialist is AIRS certified, does the Family Caregiver Specialist also have to be AIRS certified? It would make sense that the person entering information into ESP would need to be the certified individual.</p>	<p>Iowa Association of Area Agencies on Aging (I4A)</p>	<p>The individual doing the intake/interview with the client should be CIRS-A certified. CIRS does include training and certification in the area of data base management, so if an agency desires to require CIRS certification for an employee who enters information into ESP, it is their choice.</p> <p>Note: Delete the words “shall agree to”</p>
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