

IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS BT2025105 JULY 10, 2025

IHCP updates policy regarding direct caregivers for personal care services; attestation due by July 24

Per *House Enrolled Act (HEA) 1120*, the Indiana Family and Social Services Administration (FSSA) Office of Medicaid Policy and Planning (OMPP) is required to update the policy for the minimum percentage of reimbursement for personal care services, including Structured Family Caregiving (SFC) and Attendant Care (ATTC), under the Home- and Community-Based Services (HCBS) waivers that must be “passed through” to the individual providing the direct care services.



Effective **July 1, 2025**, for Health and Wellness (H&W), Traumatic Brain Injury (TBI) and Indiana PathWays for Aging (PathWays) 1915(c) waivers and Money Follows the Person (MFP) Demonstration Grant, the minimum percentage passthrough for Attendant Care services is 70%. Providers shall not use less than 70% of their hourly reimbursement rate for compensation for direct services that include, but are not limited to, increased wages, employee-related expenses (ERE), and administration and overhead costs.

The minimum percentage passthrough for Structured Family Caregiving services is 60%. Providers shall not use less than 60% of the daily rate received for caregiver stipends and for the individual providing the direct service, which may include, but is not limited to, hourly rate increases, benefits and transportation expenses.

Table 1 shows the minimum percentage passthrough for Attendant Care and Structured Family Caregiving services, effective July 1, 2025.

Provider agencies will be required to maintain records/documentation to corroborate the requirements for audit purposes. Providers will be required to sign an attestation for compliance (see the [attestation attachment](#) following this bulletin).

Completed attestation forms should be sent via email to the FSSA Home- and Community-Based Services (HCBS) Rate Methodology mailbox at HCBS.Ratemethodology@fssa.in.gov by July 24, 2025.

Table 1 – Attendant Care and Structured Family Caregiving policy update, effective July 1, 2025

Questions	Attendant Care	Structured Family Caregiving
What is the rate the state pays the waiver provider (the agency contracted with the FSSA)?	\$34.36/hour	\$77.54/day Level 1 \$99.71/day Level 2 \$133.44/day Level 3
What is the required minimum passthrough percentage?	70% of hourly reimbursement rate, which may be in the form of wages and ERE	60% of per diem rate

Table 1 – Attendant Care and Structured Family Caregiving policy update, effective July 1, 2025 (Continued)

Questions	Attendant Care	Structured Family Caregiving
What administrative costs are assumed to be covered?	Mileage for traveling to waiver members, administration and overhead (such as office functions), and training and supervision of Attendant Care caregiver.	The caregiver coach and nurse supervision delivered to the caregiver, overhead (such as office functions) and staff transportation to visit the caregiver The provider agency must identify the skill development and wellness needs of the primary caregiver and provide access to a qualified substitute caregiver as needed for up to 15 days per year.

QUESTIONS?

If you have questions about this publication, please contact Customer Assistance at 800-457-4584.

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ATTESTATION FOR THE PASSTHROUGH REQUIREMENT

This Attestation is intended to document compliance by the undersigned with the Indiana Family and Social Services Administration (FSSA) Office of Medicaid Policy and Planning's (OMPP) policy arising out of the requirement set forth in *House Enrolled Act (HEA) 1120*.

For the Health and Wellness (H&W), Traumatic Brain Injury (TBI) and Indiana PathWays for Aging 1915(c) waivers and Money Follows the Person Demonstration Grant (MFP), the minimum percentage passthrough for Attendant Care (ATTC) services will be 70% and the minimum percentage passthrough for Structured Family Caregiving (SFC) passthrough will be 60%.

The following definitions apply to ATTC and SFC, respectively:

- **Attendant Care** providers shall not use less than 70% of their hourly reimbursement rate for compensation for the individual providing the direct service, which may include but shall not be limited to all employee-related expenses, hourly rate increases, benefits, shift differentials, overtime, hiring and retention bonuses, or recruitment as defined by the Secretary. Employee-related expenses shall include but are not limited to mileage, administrative and overhead costs (office functions), training costs, and any supervision requirements for the attendant care providers.
- **Structured Family Caregiving** providers shall not use less than 60% of the daily rate received for caregiver stipends and for the individual providing the direct service which may include but shall not be limited to hourly rate increases, benefits, shift differentials, overtime, hiring and retention bonuses, or recruitment, as defined by the Secretary. Caregiver coach and nurse supervision expenses of the caregiver, including training and transportation expenses, shall be included in the 60% calculation, as well as any incurred respite care costs.

For compliance purposes, provider agencies must also:

- Agree to maintain records/documentation to corroborate requirements for audit purposes.
- Agree to "pass through" the required percentage to the individual providing the direct care services as outlined above.

Attestation Statement:

In completing this form, I affirm that my agency is a provider of either Attendant Care services and/or Structured Family Caregiving services, and I HEREBY CERTIFY that I have examined the above for the passthrough requirements, and to the best of my knowledge and belief, this statement of compliance with the above standard is true and accurate.

Agency Name: _____

Address: _____

City, State, ZIP Code: _____

Telephone #: _____ Email: _____

IHCP Provider ID (formerly LPI): _____

Signature _____ Date _____

Printed Name _____ Title _____

Completed attestation forms should be sent via email to the FSSA Home- and Community-Based Services (HCBS) Rate Methodology mailbox at HCBS.Ratemethodology@fssa.in.gov by July 24, 2025.