

# Disenrollment Counseling

## ADRC Operations Manual

### I. Introduction

Disenrollment counseling is provided to customers who have either requested to disenroll from publicly funded long-term care or are required by the program to disenroll due to loss of eligibility or other reasons. ADRC staff providing disenrollment counseling must do so in a manner that follows all DHS-required policies and procedures described below.

### II. Requirements for Performing Disenrollment Counseling

#### A. Disenrollment Counseling Timelines

The ADRC must provide information and counseling to assist customers in the process of disenrollment from a publicly funded long-term care program, whether requested by the customer or required by the program. The ADRC:

- Must contact the customer or their legal representative to offer disenrollment counseling within two business days of receiving a request to disenroll them from managed care or IRIS.
- Must offer disenrollment counseling to customers before member-requested disenrollments from the MCO or IRIS program can occur.
- If a member is being disenrolled due to loss of eligibility or loss of contact, the ADRC must offer to meet with them and provide disenrollment counseling; however, the customer or their legal representative may choose to decline the offer. In these situations, the disenrollment date is predetermined.
- In the situation of a DHS-approved disenrollment, when there is a concern for the ADRC specialist's safety, the ADRC may consider sending multiple staff to meet with the customer, requesting the customer to meet in the office, or in rare circumstances not offering disenrollment counseling to the customer. In these situations, the disenrollment date is predetermined.
- Disenrollment counseling can be completed face-to-face, virtually, or by telephone according to the customer's preference. When disenrollment counseling is required or requested, it must occur within five business days of the

ADRC's initial contact with the customer, unless the customer or their legal representative refuses the service or requests an extension of the timeline.

## **B. Required Components of Disenrollment Counseling**

ADRC specialists must complete all of the following components as part of the disenrollment counseling process. ADRC specialists should also reference the [Enrollment and Disenrollment Process Desk Aid for Publicly Funded Long-Term Care Programs \(P-02915\)](#).

1. Review the reason for disenrollment. This should include asking whether the customer was or is in the process of a grievance or an appeal.
2. Provide information about the grievance and appeal process. This includes providing options for resolving any disagreements between the individual and the managed care organization (MCO), IRIS consultant agency (ICA), or fiscal employer agent (FEA), and advocacy resources, including the ombudsman, that are available to assist with grievances.
3. Provide information and counseling about services and programs that would be available to the customer if they disenroll, including information on other MCO, ICA, and FEA options, fee-for-service Medicaid, and private pay options.
4. Help customers understand the implications of disenrollment.
5. Provide information about opportunities for re-establishing eligibility and re-enrolling.
6. Assist customers who have requested to disenroll by selecting a disenrollment date. Inform customers of the disenrollment date that has been preselected if their disenrollment is due to ineligibility or another DHS-approved disenrollment reason.
7. Obtain a signed disenrollment form for customers who decide to disenroll from managed care or IRIS, in accordance with the [Long-Term Care Authorization, Enrollment, and Disenrollment Form Signatures Policy \(P-02923-05\)](#) and using the standard forms provided by DHS (see Section D below).

### C. Processing Disenrollments for Managed Care and IRIS

ADRC specialists must follow the process outlined in the [Enrollment and Disenrollment Process Desk Aid for Publicly Funded Long-Term Care Programs \(P-02915\)](#).

ADRC specialists are also encouraged to utilize the [Enrollment and Disenrollment Resource Guide \(P-02997\)](#) that describes the roles of the different agencies responsible for providing accurate, efficient, and timely eligibility determination and enrollment into publicly funded long-term care.

### D. DHS-Approved Materials

<b>Long-Term Care General Info.</b>	<b>Family Care</b>	<b>IRIS</b>	<b>Partnership</b>	<b>PACE</b>
<p><a href="#">Family Care, Partnership, PACE, or IRIS Change Routing Instructions (F-02404)</a></p> <p><a href="#">Family Care, Partnership, PACE and IRIS Program requested Disenrollment (F-02403)</a></p>	<p><a href="#">Family Care/IRIS Member Requested Disenrollment or Transfer and Instructions (F-00221)</a></p>	<p><a href="#">Family Care/IRIS Member Requested Disenrollment or Transfer and Instructions (F-00221)</a></p> <p><a href="#">Participant Fiscal Employer Agent Transfer Request (F-02764)</a></p> <p><a href="#">IRIS FEA Transfer Calendar (P-02239)</a></p>	<p><a href="#">Partnership Member Requested Disenrollment or Transfer Form and Instructions (F-00534)</a></p>	<p><a href="#">PACE Member Requested Disenrollment or Transfer Form and Instructions (F-02484)</a></p>

### E. Documentation in Client Tracking System

## Disenrollment Counseling Client Tracking

Encounter(s)	ADRC Outcome	Example Note
<ol style="list-style-type: none"> <li>1. A customer contacts the ADRC expressing a desire to disenroll from Family Care.</li> <li>2. The ADRC gathers information about the reason the customer wishes to disenroll.</li> <li>3. The ADRC discusses the different long-term care programs available in the county.</li> <li>4. The ADRC confirms that the customer wants to disenroll from their publicly funded long-term care program.</li> </ol>	<p>Provided disenrollment counseling</p>	<p>Met with a customer who is expressing a desire to disenroll from the Family Care program. The customer stated that they are unhappy with their care plan and cost share. Discussed the other publicly funded long-term care program options available and private options available to meet his needs. At this time, the customer has decided to disenroll and continue utilizing informal supports from his family members to meet his needs. Proceeded with completing the disenrollment paperwork and routed to all appropriate partners.</p>

### III. Collaborating with Other Aging and Disability Programs

#### A. Options Counseling

Options counseling may occur as part of the disenrollment process or following the disenrollment process. In most ADRCs, the staff that provide options counseling are the same staff that provide disenrollment counseling for publicly funded long-term care programs.

## B. Enrollment Counseling

At times, customers may wish to disenroll from their current program and enroll into a new program. In these situations, ADRCs will begin by providing disenrollment counseling to the customer. Through disenrollment counseling, it may be identified that the customer is interested in trying a different publicly funded long-term care program. If the customer is still eligible, staff would then provide enrollment counseling.

## C. Functional Eligibility Determination

Disenrollment counseling may occur as a result of a customer having a change in their functional screen results. It is important for ADRC staff who provide disenrollment counseling to be familiar with the functional screen and the various levels of care.

## D. Financially Eligibility Determination

Disenrollment counseling may occur as a result of a customer having a change in their financial eligibility. It is important for ADRC staff who provide disenrollment counseling to be familiar with the financial eligibility requirements of the publicly funded long-term care programs.

## E. Advocacy

ADRCs must be knowledgeable about customer rights, appeal processes, and advocacy resources. As part of the disenrollment counseling process, staff should provide customers with information about these topics.

# IV. Operational Policies and Procedures

## A. Statutory References

[Wisconsin Statute § 46.283](#)

[Wisconsin Administrative Code – DHS Chapter 10](#)

[CFR 42 Chapter IV](#)



[Medicaid Managed Care Rule](#)

[1915 \(b\) waiver](#)

[1915 \(c\) waiver](#)

[Family Care, Partnership, and PACE Contracts with MCOs](#)

[IRIS Work Instructions \(P-00708A\)](#)

[Medicaid Eligibility Handbook](#)

## **B. Agency Requirements**

DHS prohibits ADRCs from being co-located in the same building as an MCO, ICA, or FEA. Co-location with any of these entities creates the appearance of a conflict of interest. If any of the agencies move into the same building as an ADRC, the ADRC must notify DHS within three business days.

DHS prohibits ADRCs from having anyone serve as an ADRC board member who is or who has a family member who is employed by, has financial interest in, or serves on the governing board of a Family Care, PACE, Family Care Partnership, or SSI MCO, ICA or FEA.

The ADRC must provide information on the informal and formal processes for resolving grievances regarding the ADRC, MCO, ICA, FEA, or other long-term care, health care program, or provider. This information must include whom to contact if the person has a problem with the ADRC, MCO, ICA, FEA, or other program, provider, or service.

ADRCs will refer to DHS's [Enrollment and Disenrollment Resource Guide \(P-02997\)](#) for details regarding each agency's responsibility in the enrollment process for publicly funded long-term care. ADRCs will participate in DHS's annual review and revisions of the [Enrollment and Disenrollment Resource Guide \(P-02997\)](#) and the [Enrollment and Disenrollment Process Desk Aid for Publicly Funded Long-Term Care Programs \(P-02915\)](#).

Employees of the ADRC and any of its subcontractors who provide information and assistance, options counseling, benefits counseling, long-term care functional screening, enrollment counseling, disenrollment counseling, or other professional responsibilities will have a Bachelor of Arts or Science degree or a license to practice as a registered nurse in Wisconsin. In addition, they must have the equivalent of at least one year of full-time experience in a health or human services field, working

with one or more of the client populations served by the ADRC. Qualifying work experience may be paid or unpaid and may include internships, field placements, and volunteer work.

The ADRC must obtain approval from DHS for a request for [Waiver of Education or Experience Requirements \(F-00054\)](#) prior to making a job offer to a candidate that lacks the degree or experience described above.

## C. Supervision

ADRC supervisors that oversee staff that perform disenrollment counseling are responsible for the following:

- Mitigating conflicts of interests and perceived conflicts of interest that are brought to them by the staff.
- Ensuring that staff are using only DHS-approved materials for enrollment counseling.
- Ensuring timely completion and submission of the ADRC/Aging/Tribal [User System Access Request \(F-02000\) form](#) for new staff.
- Ensuring timely completion and submission of the ADRC/Aging/Tribal [User System Access Request \(F-02000\) form](#) for staff that have resigned or been terminated from their position, or are no longer performing job duties that require access to certain systems.

ADRC supervisors are encouraged to provide regular feedback to their staff on how they are performing disenrollment counseling. This can be done using the [Disenrollment Counseling Feedback Tool and Instructional Guide \(P-01068\)](#). This is not required, but is a useful tool for both staff and supervisors.

Maintaining relationships with the managed care organizations, IRIS consultant agencies, fiscal employer agents, and income maintenance consortia that serve the same geographic area as the ADRC is important and encouraged. Supervisors may choose to hold regular meetings with these agencies to discuss processes and other workflows.

## D. Allowable Funding Sources and Expenses

ADRC

## E. Policy Requirements

[Conflict of Interest \(P-02923-03\)](#)

[Long-Term Care Authorization, Enrollment, and Disenrollment Form Signature Policy \(P-02923-05\)](#)

[Appeal Policy for Adverse Benefit Determinations \(P-02923-01\)](#)

[Complaint and Grievance Policy \(P-02923-02\)](#)

[Confidentiality \(P-02923-06\)](#)

## **F. Training and Certification Requirements**

Knowledge of long-term care resources, programs, and supports is critical to the professional responsibility of disenrollment counseling. Staff providing disenrollment counseling are strongly encouraged complete the following modules in the [Learning Management System](#):

- ADRC Orientation
- ADRC Specialists Initial Training
- Motivational Interviewing

DHS and other aging and disability network partners regularly offer training and continuing education opportunities that are beneficial to staff who provide options counseling. Staff are strongly encouraged to participate in the following opportunities:

- In-person or online training opportunities for staff
- ADRC skills training
- Professional conferences, such as the Aging and Disability Network conference

An up-to-date schedule of trainings can be found on the [ADRC Calendar of Events](#).

## **G. Reporting Requirements**



All ADRC staff that provide disenrollment counseling are required to complete 100% Time and Task (*link pending*) reporting for Medicaid Administrative claiming. Detailed information on 100% Time and Task Reporting (*link pending*) can be found within that section of this manual.

In order to enroll customers into publicly funded long-term care programs, ADRC staff must be able to access the ForwardHealth system. This system is also used as a tool to gather information, when needed, about customer eligibility in other programs such as SSI HMOs.

Staff must have access to CARES with read-only rights in order to view progress with the Medicaid application process.