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To: County Department of Human Services Directors
County Department of Social Services Directors
County Department of Community Programs Directors
Children's Long-Term Support Supervisors and Leads
Aging and Disability Resource Centers (ADRC) Directors
Tribal Aging and Disability Resource Specialists (Tribal ADRS) Director
Managed Care Organizations
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Transition of Eligible Participants from Children's to Adult Long-Term Care Programs

Purpose

The purpose of this memo is to define and clarify roles of county waiver agencies (CWAs), aging and disability resource centers (ADRCs), and adult long-term care (ALTC) programs; and specify timelines for transitioning participants from a Children's Long-Term Support (CLTS) Waiver Program to ALTC programs.

I. Participant transition pathways

- A. Participants of the CLTS Waiver Program, who are eligible for programs that serve adults must transition to an ALTC program on their 18th birthday or as close to it as possible. Participants will be able to choose among ALTC programs available in their geographic service area.
- B. Some CLTS Waiver Program participants may not be eligible for ALTC programs at age 18. There are two potential pathways for these individuals:
 1. If a young adult remains eligible for the CLTS Waiver Program, based on a current CLTS functional screen, that individual may continue to be served by the CLTS Waiver Program through age 21. Upon reaching age 22, the young adult would no longer be eligible for the CLTS Waiver Program.
 2. If a young adult is financially or functionally ineligible for both CLTS and ALTC programs, the individual shall be provided information on other community options by their support and

service coordinator (SSC), aging and disability resource center (ADRC), or tribal aging and disability resource specialist (ADRS).

- c. More information on CLTS transition may be found in Chapter 10 of the [CLTS Waiver Manual \(P-02256\)](#).

II. Roles and responsibilities

A. Shared responsibilities

Throughout the transition process, county waiver agencies (CWAs), ADRCs, or tribal ADRSs are expected to work collectively to:

- Help youth and family prepare paperwork for disability determination, as needed.
- Address issues and barriers experienced by families and provide timely answers to questions.
- Prepare the youth and family for supportive decision-making or guardianship, if applicable.
- Ensure coordination among agencies to support a timely transition, avoid delays or gaps in services, and help the youth transition as seamlessly and successfully as possible.
- Collaborate when youth and family are hesitant to transition into ALTC.

ADRCs and tribal ADRSs will:

- Explain ALTC program options that are available to an eligible youth and ensure that a choice has been made prior to the person's 18th birthday.
- Determine adult functional eligibility and verify financial eligibility.

B. Process

When the youth reaches **age 14**, the CWA begins transition discussions with the youth and their family. Part of this discussion is to ensure the person understands that they will be expected to transition to ALTC by age 18.

When the youth reaches **age 17 years and 6 months**, the CWA must refer the youth to the ADRC or tribal ADRS to begin the process of transitioning into the ALTC system. ADRCs' and tribal ADRS' role is to determine eligibility. ADRCs or tribal ADRS determine functional eligibility using the long-term care functional screen and verify financial eligibility. If the youth is found both functionally and financially eligible, the ADRC or tribal ADRS provides enrollment counseling to discuss available adult programs.

Individuals may be enrolled in Family Care or IRIS (Include, Respect, I Self-Direct) program without first obtaining an adult disability determination from the Disability Determination Bureau if they have another source of Medicaid. However, the disability determination may be required for establishing Medicaid eligibility.

Further information about these functions can be found in the ADRC Operations Manual, under Options Counseling ([P-03062-02](#)), Eligibility Determination ([P-03062-04](#)), and Enrollment Counseling ([P-03062-03a](#)). Further enrollment and disenrollment information can be found in the Enrollment and Disenrollment Process Desk Aid ([P-02915](#)) and Long-Term Care Programs: Enrollment and Disenrollment Resource Guide ([P-02997](#)).

For young adults who select Family Care or Family Care Partnership, the enrollment date is established with the ADRC or tribal ADRS. The enrollment date is mutually agreed upon by the

individual and the ADRC or tribal ADRS and should be on or after the participant's 18th birthday and no later than the first of the month following the participant's 18th birthday. The ADRC or tribal ADRS submits the appropriate enrollment form to the managed care organization (MCO), CWA, and income maintenance (IM) agency, if applicable. The ADRC or tribal ADRS will notify the CLTS SSC via the enrollment form. If this is not possible, there needs to be mutual agreement and rationale must be provided, such as those included under special circumstances.

For young adults who select IRIS, the ADRC or tribal ADRS makes a referral to an IRIS Consultant Agency (ICA), and the enrollment date is set when the Individual Support and Service Plan (ISSP) is complete. If the youth and family is interested in IRIS, they should be informed that IRIS has 60 days from referral date to develop the ISSP. The IRIS start date is a date when all the required enrollment elements are met and agreed upon by the ICA, the CLTS SSC, and the individual, ideally the participants 18th birthday, but no later than the first of the month following the participant's 18th birthday.

If it is not possible for a young adult to be enrolled in their chosen ALTC program no later than the first of the month following the participant's 18th birthday, there needs to be mutual agreement and rationale must be provided, such as those described below in special circumstances. If there is a significant delay in enrollment into an ALTC from the CLTS Waiver Program, the CWA must contact their assigned [children and family program specialist \(CFPS\)](#).

When a young adult who is at least 18 years of age enrolls in Family Care, Family Care Partnership, or IRIS, they are no longer eligible for the CLTS Waiver Program. It is the young adult's/family's choice whether to enroll in Family Care, Partnership, or IRIS. It should be explained to the youth that if they are eligible for an ALTC program but choose not to enroll, the youth will no longer be eligible for the CLTS Waiver Program and will be disenrolled from the CLTS Waiver Program.

Ongoing communication and coordination between the CWA and the ADRC or tribal ADRS is critical to ensure young adults experience a safe and seamless transition to adult long-term supports and to avoid gaps in services to the time of enrollment in Family Care, Family Care Partnership, or IRIS. Local agencies must work together to define the process used by the CWA to refer young adults to the ADRC or tribal ADRS, and how the ADRC or tribal ADRS intends to notify the CWA about the outcome of the referral. This process should be locally defined, based on what works for the agencies involved while also achieving timely enrollment in an ALTC program.

All costs associated with the individual's CLTS Waiver Program services, including the cost of support and service coordination, remain reimbursable through the CLTS Waiver Program until the mutually understood date of enrollment in Family Care, Family Care Partnership, or IRIS.

C. Process for disenrollment from the CLTS Waiver Program

Upon eligibility determination and selection of an ALTC program, the ADRC or tribal ADRS notifies the CWA by sending the Family Care or Family Care Partnership enrollment form or the IRIS Authorization Form. Notification includes the Family Care or Partnership enrollment date or the date an IRIS referral was made. It also includes direct contact information for assigned personnel from the CWA, ADRC, Tribal ADRS, and ALTC program selected by the participant.

The CWA will be notified of the IRIS start date when the ICA sends an updated IRIS Authorization Form with the enrollment date entered.

Following verification of enrollment, the CWA ends the current CLTS program enrollment in ForwardHealth. The CLTS disenrollment date must be the day prior to the Family Care, Partnership, or IRIS enrollment date. An IRIS referral date is not the same as an enrollment date, and the youth continues to be enrolled in CLTS. The IRIS enrollment date is mutually agreed upon between the IRIS Consultant Agency (ICA), CWA, and participant.

III. Special circumstances

Increased coordination and communication is needed for youth categorized as:

- Hesitant to transition or non-responsive
- In out-of-home care or substitute care settings
- Vulnerable or high-risk
- Having a current and approved restrictive measures application

Hesitant and/or non-responsive youth and families

Partners who find that a youth or family is unresponsive or hesitant to transition should reach out to other partners, including CWAs, to support messaging provided in options counseling and help support the necessary step together. Instead of closing unresponsive cases, partners should consult with the CWA to determine other strategies and appropriate next steps.

Youth living in out-of-home care or substitute care settings

In addition to being functionally and financially eligible, the youth must be in an eligible living setting.

Youth in some out-of-home settings could result in an exception to the enrollment deadline on the 18th birthday, or by the first of the month following the youth's 18th birthday, as the ALTC programs cannot enroll an individual before their 18th birthday. The youth will remain enrolled in the CLTS Waiver Program to ensure the youth continues to receive necessary supports and services until an enrollment date is chosen for a ALTC program.

Note that Level 5 Foster Homes may be dually licensed as Adult Family Homes, as outlined in the DCF Level 5 Exceptional Treatment Foster Home Guide to Certification and, which can be implemented to facilitate a seamless transition. Additional consideration, the youth may be eligible for extension of out-of-home care under Wis. Stat. § 48.366 or Wis. Admin. Code ch. DCF 21. If the youth remains under an Extension of Out-of-Home Care, they may remain enrolled in the CLTS Waiver Program.

Partners support all youth regardless of where they are residing as they prepare for transition.

Transition of High Risk/ Vulnerable Individuals

When transitioning a youth who is vulnerable or high-risk, the SSC will identify and communicate pertinent information, as needed, with the ADRC or tribal ADRS and chosen ALTC organization regarding the vulnerable youth before the transition to adult services occurs. By sharing information regarding the youth's support network and individual needs, the SSC will help to develop a shared understanding of the young adult's circumstances and needs, while facilitating a safe and effective transition.

Youth who have a high level of life sustaining needs (nutrition, fluids, or medical treatment) and any one of the following is a high-risk vulnerable participant necessitating additional protections during transition:

- The youth is isolated with limited or no adult contact outside the home and is not available to be observed.
- The youth is nonverbal and has limited ability to communicate.
- The youth is medically complex, requires significant care from a caregiver or parent, and is highly dependent on others to meet basic needs.
- The youth has a primary caregiver who is actively abusing substances.
- The youth is highly dependent on parents or caregivers.

Youth with restrictive measures

When a CLTS Waiver Program participant has an approved CLTS restrictive measures application at the time of transition, partners complete the following procedures:

- The CWA must inform the ALTC Program of the approved CLTS restrictive measures application upon notification of enrollment.
- When the young adult transitions to an adult long-term care program (from CLTS to Family Care, Partnership, or IRIS), the CLTS approval is valid for 90 days after enrollment.
- Upon enrollment in an ALTC program, the MCO or ICA will assist the participant in completing and submitting their restrictive measures application as consistent with the state ALTC program policy.
- The CWA and ALTC program work together to ensure a smooth transition of plans including the use of restrictive measures to ensure continuity of care.
- The ALTC program processes the approval of the adult restrictive measures application.
- The CLTS restrictive measure plan ends at the time the young adult has an approved adult restrictive measure application or after the 90-day grace period.

IV. Effective date, who to contact with questions, and resources

Effective date

The policies and procedures addressed in this memo are effective immediately.

Who to contact with questions

Children's programs questions should be directed to the CLTS [children and family program specialist team](#). ADRC and tribal ADRS questions should be directed to the [assigned regional quality specialist](#). IRIS questions should be directed to the [IRIS inbox](#).

Resources

- [Approved § 1915\(b\)\(4\) Application for Selective Contracting: Support and Service Coordination Requirements Eligibility and Enrollment \(P-02049\)](#)
- [Medicaid § 1915\(c\) Home and Community-Based Services Children's Long-Term Support Waiver Application](#)
- [Medicaid Home and Community-Based Services \(HCBS\) Waiver Manual for the CLTS Waiver Program \(P-02256\)](#)
 - Chapter 9—Health and Safety
 - Chapter 10—Transition
- [Adult Long Term Care Programs: Enrollment and Disenrollment Resource Guide \(P-02997\)](#)
- [Enrollment and Disenrollment Process Desk Aid for Publicly Funded Long-Term Care Programs \(P-02915\)](#)
- [Programs for Children with Delays and Disabilities: County Contact Information](#)
- [Find an Aging and Disability Resource Center](#)
- [Partnership Area Map](#)