

Children's Long-Term Support (CLTS) Waiver Program Timely Filing Claim Processing Changes

Background and Purpose:

As a good business practice, CLTS providers, including county waiver agencies (CWAs) in their role as a provider, should regularly submit service claims to Wisconsin Physicians Service (WPS) as promptly as possible.

The Wisconsin Department of Health Services (DHS), Bureau of Children's Services (BCS) is changing the CLTS Waiver Program's timely filing claim processing requirements and protocol. The changes will apply to all CLTS providers, including CWAs. These changes will ensure:

- Compliance with federal Medicaid timely claim payment requirements under 42 CFR 447.45.
- Alignment of CLTS timely claim processing policies and protocols with Wisconsin Medicaid and other home and community-based service (HCBS) waiver programs.
- Streamlining of the current CLTS timely filing claim processing paperwork and protocol.

Effective July 1, 2021, the CLTS Waiver Program's timely filing claim processing policies and protocol will include the following changes:

- The timely filing period will increase from the current 120 calendar day period to **365 calendar days**.
- The DHS contracted third party administrator (TPA) vendor, WPS, will accept, review and issue decisions to requests for timely filing claim denial exception requests. Service providers will no longer submit request through CWAs.
- Claims submitted with date of service (DOS) past the 365 cut-off will be denied with only limited exceptions.

CLTS Timely Filing Claim Processing Criteria:

- On July 1, 2021, WPS will process all CLTS service claims using the timely filing deadline of 365 days from the DOS, or the end date of service when a date span is used.
- CLTS service claims with DOS of 365 days or more will be denied.
- The timely filing claims editing is based on the DOS billed on the claim and the WPS received date.
- For claims covered by Medicare or private insurance, to coordinate the third party liability (TPL) benefits, WPS will process claims within 365 days of the date of the Explanation of Benefit (EOB) statement. The EOB must be submitted with the CLTS claim to detail the TPL disposition.

CLTS Timely Filing Exception Request Criteria:

CLTS service claims submitted to WPS with a DOS of 365 calendar days or more will be denied. Effective July 1, 2021, only limited exception reasons to the 365-day timely filing deadline are permitted, as follows:

- In accordance with a court order.
- DHS-initiated corrective action taken to resolve a dispute.
- Claims that cannot be filed in a timely manner by the provider due to a delay or lapse in the CLTS participant's eligibility in the Eligibility and Enrollment System (EES).

Submitting CLTS Timely Filing Limit Exception Review Requests:

- Effective July 1, 2021, if providers (including CWAs) wish to request a review of denied claims which are past the 365-day limit, the request must be submitted on a completed WPS *CLTS Waiver Program Claim Timely Filing Review* form [emailed to WPS](#).

- WPS will be posting the *CLTS Waiver Program Claim Timely Filing Exception Review* form on their CLTS provider website on July 1, 2021.
 - WPS will accept the CLTS Timely Filing Exception Request form upon receipt and review it based on the DHS exception criteria detailed above, within 10 days.

CLTS Timely Filing Exception Processing: June to July 1 Transition Period:

- For claims not yet submitted to WPS that are over 120 days old and within 365 days, providers should wait to submit the claim until on or after July 1, 2021.
- Denied claims for timely filing (code TFO) prior to July 1, 2021, that are within 365 days should be billed as a new claim on or after July 1, 2021.
- CLTS timely filing exception requests submitted to the DHS CLTS Provider inbox on or after July 1, 2021, will be returned to the sender.
- During the first three months of transitioning to the revised CLTS timely filing claims processing implementation (July 1 through October 31, 2021), WPS and DHS will jointly review and issue decisions for all CLTS timely filing exception requests for claims that exceed 365 calendar days.