

State-Level Budget and Enrollment Administration Initiative Special Circumstances and Fiscal Responsibilities Training



Wisconsin Department of Health Services
Division of Medicaid Services
Bureau of Children's Services

November 19, 2020

Information About Today's Training

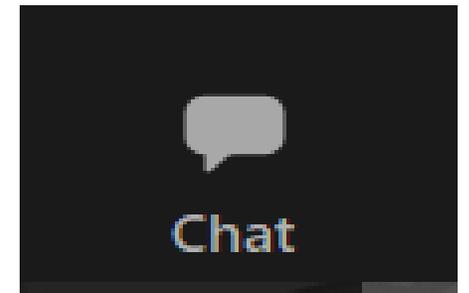
This training is being recorded.

A recorded version of the presentation and slides will be made available on the Waitlist Information for County Waiver Agencies webpage:

<https://www.dhs.wisconsin.gov/clts/waiver/waitlist.htm>

Information About Today's Training

- Everyone is muted.
- You can submit your questions and comments in the chat feature. The chat is private, but being reviewed by DHS staff.
- County-specific questions will not be addressed during today's training. Reach out to technical assistance (TA) leads if you have questions.



Goals for Today's Training

- Review Policy and Operational Guidelines for Exceptional Expense
- Review Policy and Operational Guidelines for High-Cost Items
- Review Policy and Operations for Participant County Moves During Enrollment
- Review Fiscal Responsibilities
 - Maintenance of Effort
 - Reconciliation

Supporting Documentation

- This PowerPoint Presentation
- Operational Aid will be published in December
- These supporting documents will be posted on the Waitlist Information for County Waiver Agencies webpage:
<https://www.dhs.wisconsin.gov/clts/waiver/waitlist.htm>

State-Level Budget and Enrollment Administration Initiative High-Cost and Exceptional Expense Policy Updates



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Purpose

Updating the current exceptional expense and high-cost item review processes is necessary for the Wisconsin Department of Health Services (DHS) to:

- Ensure the integrity of the state-level budget.
- Accurately predict state-level enrollment.

Current Exceptional Expense Review Process

- Initiated when a county waiver agency (CWA) believes a participant's ongoing CLTS service expenses will exceed the county service allocation
- No formal process has been established

State-Level Budget Exceptional Expense Review Process

DHS has established a tiered threshold review process effective January 1, 2021.

- Low threshold (Tier 1)
 - CWAs must submit a form to **notify DHS**
 - DHS approval is not required
- High threshold (Tier 2)
 - CWAs must submit a form and the Exceptional Expense individual service plan (ISP) to **DHS for review and approval** prior to service authorization.

State-Level Budget Exceptional Expense Review Process, cont.

The **low threshold** has been set according to historical top 1% participant claims costs:

- \$56,000/annually or \$154.71/day (CY19 data).
 - Excluding high-cost items submitted via F-21353
- This low threshold is five times higher than the average Per Participant Per Month (PPPM) claims costs.

State-Level Exceptional Expense Review Process, cont.

The **high threshold** has been set to match current DHS exceptional expense review panel workload:

- \$100,000/annually or \$273.97/day
 - Excluding high-cost items submitted via F-21353
- DHS will review and provide response to CWA within 14 calendar days of submission of a completed form

State-Level Exceptional Expense Review Process, cont.

- DHS will review and approve the Exceptional Expense with the following considerations:
 1. The ISP services and supports meet the identified outcomes
 2. Services are Waiver Allowable
 3. All funding sources have been considered
 4. Deciding Together was utilized to ensure family partnership and appropriateness of ISP development

State-Level Exceptional Expense Form

Walk-through of State-Level Exceptional Expense Form

Current State-Level High-Cost Review Process

- High-cost item request process is formalized for home modification and adaptive aid requests
- CWA submits Children's Long-Term Support Waiver High-Cost Request ([F-21353](#)) to the TA lead for review
- TA lead responds in 5-10 business days
- When item/service is not within allowable high-cost range or does not have a published high-cost range, request is forwarded to DHS High-Cost Panel for approval

State-Level High-Cost Item Review Process

- DHS has established a tiered threshold review process for the following high-cost items:
 - Adaptive Aids (including vehicle modifications)
 - Consumer Education and Training
 - Home Modification
- Effective January 1, 2021

State-Level High-Cost Item Review Process cont.

- Low threshold (Tier 1)
 - CWAs must **submit F-21353** to DHS.
 - DHS approval is not required.
- High threshold (Tier 2)
 - CWAs must submit F-21353 to **DHS for review and approval** prior to service authorization.

State-Level High-Cost Review Process, cont.

Low threshold: For a high-cost item equal to or greater than \$2,000 and is within the established typical range:

- Submit F-21353 to DHS.
- DHS approval is not required.

State-Level High-Cost Review Process, cont.

High Threshold: For a high-cost item that is equal to or greater than \$2,000 and does not have an established typical range or is over the typical range:

- Submit F-21353 to DHS with all accompanying information as identified on F-21353i.
- **Review and approval** by DHS is required before moving forward with service authorization.
- DHS will review and provide response to CWA within 14 calendar days of submission of a completed F-21353.

State-Level High-Cost Form

Walk-through of State-Level High-Cost Form: F-21353

State-Level Budget and Enrollment Administration Initiative Participant County Moves During Enrollment



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Medicaid Waiver Services Regulations

- An eligible child or youth who has begun receiving Medicaid waiver services has a right to continuity of services and freedom of movement while residing in Wisconsin.
- Medicaid waiver services may not be reduced or terminated solely because a child or youth has moved to a different county.

State-Level Budget Impact

- Budgeting is managed on a statewide basis by DHS.
- All enrolled children are fully funded.
- Current policy regarding funding responsibilities and county specific waitlists is obsolete.

Policy for County Moves during Enrollment

Continue current requirement: The child and their family or the sending county have the responsibility to notify the receiving county, with as much advance notice as possible, of their plans to move.

Policy for County Moves during Enrollment, cont.

New requirement: The receiving county may not enter the child in the Program Participation System (PPS) to be assigned a statewide enrollment position and await an enrollable status prior to assuming full authority over the child's ISP.

Policy for County Moves during Enrollment, cont.

Continue current requirement: The receiving county verifies functional eligibility has been determined within the last 12 months and does not perform a rescreen due to the move. Functional eligibility determinations are only completed once every 12 months.

Policy for County Moves during Enrollment, cont.

New requirement: The receiving county must complete all transition activities and assume full authority over the child's ISP within 30 calendar days of receiving notice of the move or within 30 calendar days of the child's move, whichever is later.

Policy for County Moves during Enrollment, cont.

Continue current requirement: The sending county must provide services outlined in the ISP while the receiving county completes transition activities and updates the ISP with the participant and family.

Policy for County Moves during Enrollment, cont.

Continue current requirement: For the entire period the sending county is responsible for services, the child is considered to be the responsibility of the sending county for all purposes associated with the waiver program.

Transition to State-Level Enrollment Administration

- There are currently more than 100 children enrolled in the CLTS Waiver Program being served by a sending county while on a county-specific waitlist for a receiving county.
- All of these children are now in enrollable status in PPS and are fully funded.

Transition to State-Level Enrollment Administration, cont.

- Receiving CWAs must complete all transition activities and assume full authority over the child's ISP as soon as possible and no later than the end of Q1 2021 in accordance with DHS guidance to enroll the current waitlist.

State-Level Budget and Enrollment Administration Initiative CLTS Maintenance of Effort (MOE)



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Current MOE (CY20)

- CWAs may contribute locally controlled funding mid-year by authorizing locally-matched services.
- MOE requirements not met by the annual reconciliation are applied to the CWA's basic county allocation (BCA) as CLTS-Overmatch.
- CWAs may apply Children's Community Options Program (CCOP) funds to offset the BCA expense caused by CLTS-Overmatch.

State-Level Budget MOE (CY21)

- **Timing:** DHS will issue an invoice in the **third quarter** to CWAs for an amount equal to the CWA's full MOE requirement.
- **Funding:** CWAs can offset some, or all, of the invoice expense as allowable CCOP or BCA expenditures.

State-Level Budget and Enrollment Administration Initiative CLTS Reconciliation



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CY20 CLTS Reconciliation

- The CY20 CLTS Reconciliation is largely unchanged from previous years.
- The only change to the CY20 CLTS reconciliation from previous years is that CWAs will not be responsible for spending in accordance with a service allocation.
 - CWAs are still responsible for their MOE requirement.

CY21 Reconciliation Changes

- The state will pay (through the third party administrator) all allowable service expenditures throughout the CY.
- CWAs will no longer have a service allocation limit that generates CLTS-Overmatch when overspent.

CY21 Reconciliation Changes, cont.

- The CLTS MOE will not be resolved as part of the annual reconciliation.
- The CLTS reconciliation will no longer reconcile individual CLTS funding sources (state-match, CCOP, BCA, tax levy, etc.).

CY21 Continuing Reconciliation Processes

All other CLTS reconciliation processes remain in place, including, but not limited to:

- Validating total service expenditures.
- Making adjustments for unallowable CLTS services (i.e. ineligible settings).
- Reporting CLTS cost shares.
- Reporting and reconciling CLTS administrative claims.

Next Steps

- Thank you for attending today's training
- Monthly Teleconference: December 3, 2020
- Supporting documents will be posted on the Waitlist Information for County Waiver Agencies webpage:
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