

STATE OF WISCONSIN
Department of Health Services
Division of Long Term Care
Division of Mental Health and Substance Abuse

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Memo Series

DLTC Joint Numbered Memo 2014-01

DMHSAS Joint Numbered Memo 2014-03

Index Title: Funding and Service Coordination for Children who are Dually Eligible for the Comprehensive Community Services Program and the Children's Long-Term Support Waivers

To: Listserv

For: Area Administrators/Human Service Area Coordinators
County Department of Developmental; Disabilities Services Directors
County Department of Human Services Directors
County Department of Social Services Directors
County Department of Community Program Directors
County Waiver Contacts
DLTC Bureau Directors
DLTC Section Chiefs
Long Term Support Planning Committee Chairs

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Subject: Funding and Service Coordination for Children who are Dually Eligible for the Comprehensive Community Services Program and the Children's Long-Term Support Waivers

Document Summary

This memo was jointly developed by the Division of Long Term Care (DLTC) and the Division of Mental Health and Substance Abuse Services (DMHSAS) to provide clarification to county human and social service agencies regarding how to proceed when children are determined to be dually eligible for the Comprehensive Community Services (CCS) and the Children's Long-Term Support (CLTS) Waiver programs. **The CCS and CLTS Waiver programs are not mutually exclusive; a child may be eligible and enrolled in only CCS, only CLTS Waivers, or jointly enrolled in both CCS and CLTS Waivers.** This document clarifies the eligibility, funding and service coordination requirements when a child is jointly enrolled in both CCS and CLTS Waivers. **The guidance provided in this memo applies only to counties which are CCS certified and thus able to offer services through the CCS Program.**

BACKGROUND

Comprehensive Community Services (CCS) Program

The Comprehensive Community Services (CCS) Program is a Medicaid State Plan benefit for persons with Mental Health and/or Substance-Use Disorders which provides a flexible array of individualized, community-based, psycho-social rehabilitation services authorized by a mental health professional. Only a certified county or tribe may operate a CCS Program. The intent of the services and supports is to provide for a maximum reduction of the effects of the individual's mental health and substance abuse disorders in order to restore them to the best possible level of functioning and to facilitate their recovery. The CCS Program uses a wraparound model that is flexible, participant directed, recovery oriented, as well as strength and outcome based. The services provided are individualized to each person's need as identified through a comprehensive assessment described in Wisconsin Administrative Code sec. 36.16, which is available at this link:

https://docs.legis.wisconsin.gov/code/admin_code/dhs/030/36

In addition to meeting functional eligibility, CCS Program eligibility is based on mental health or substance abuse diagnosis, functional impairment and need for CCS Program services as determined through the comprehensive assessment.

Children's Long-Term Support (CLTS) Waivers

CLTS Waivers requirements are described in the Medicaid Home and Community Based Waivers (HCBW) Manual which can be found online at:

<http://www.dhs.wisconsin.gov/bdds/waivermanual/index.htm>

The CLTS Waivers were created in order to access Medicaid funding on behalf of children with significant disabilities who are living at home or in the community so that they can remain at home and be active members of their communities. CLTS Waivers service coordinators partner with families in order to meet their child's disability-related needs. With the exception of children with Autism Spectrum Disorder accessing waiver funding for autism treatment services, the CLTS Waivers are not intended to be a primary funding source for treatment. Instead funds are meant to be used to provide a range of supportive services based on the assessed need of the child.

In order to meet functional eligibility for CLTS Waivers, children must have substantial limitations in multiple daily activities as a result of a developmental disability, severe emotional disability and/or a physical disability. In order to be enrolled in the CLTS Waivers Program, the child needs to meet functional eligibility as well as other program criteria, including living in an eligible setting and having an assessed need for waiver-allowable services.

Determining Eligibility for the CCS Program and CLTS Waivers

The Children's Long-Term Support Functional Screen (CLTS FS) is a web based application used by state certified screeners to determine functional eligibility for some children's programs in Wisconsin, including CCS and CLTS Waivers. **Functional eligibility is not equivalent to program eligibility and does not result in automatic enrollment into a program.** Instead, functional eligibility indicates that a child may be eligible for a program, and signals county program staff to assess the child's needs.

Medicaid participants are entitled to their choice of providers and services, and are entitled to receive sufficient information in order to make an informed choice about any and all services for which they have a functional or medical need. Therefore, counties need to inform parents/legal guardian(s)

regarding any and all programs available in that county for which their child is found functionally eligible. This includes services available through program(s) the county offers, as well as any funding constraints. For example, when a child is found dually eligible, CLTS Waiver funds cannot be used to fund CCS covered services if the family declines CCS enrollment. However, if a county does not have a CCS Program, CLTS Waivers funding can be used for any waiver-allowable services the child needs regardless of whether the child would have been covered through CCS. Because the two programs are fundamentally different, generally, the services available through each program are not equivalent or interchangeable. The CCS Program uses a community-based wraparound model that is recovery oriented, whereas CLTS Waivers are not intended to be a primary source of treatment funding. Instead, they are intended to fund long term community supports related to a child's disability.

The respective program's staff completes an assessment to determine whether the child meets all program requirements and has assessed need for services the program offers. When a child is found functionally eligible for CCS, a trained mental health professional conducts a comprehensive assessment for CCS services as described in sec. DHS 36.16. When a child is found functionally eligible for CLTS Waivers, a certified CLTS Support and Service Coordinator completes the assessment. **A child is offered enrollment into either program only if the completed assessment indicates that the child meets all program requirements, has assessed need for services the program offers, and would benefit from available services.**

Best practice is that county staff are cross-trained so that one service coordinator/facilitator can lead or perform the assessment. This can be a comprehensive assessment fulfilling requirements for both programs or the staff person could complete the CCS assessment first followed by the CLTS Waivers assessment if needed. Please note that families have the right to request an assessment for any program for which their child is found functionally eligible.

CCS Program is included in the Medicaid State Plan; therefore the CLTS Waivers are the funding source of last resort. When a child is determined to be functionally eligible for both CCS and CLTS Waivers, the child is first assessed for the CCS Program. If the child does not have assessed need for CCS services or does not meet all CCS Program requirements, the family is then referred to the CLTS Waivers Program for assessment.

If the CCS staff's assessment determines that the child meets all program requirements, the family should be offered enrollment into CCS. **Both CCS and CLTS Waivers are voluntary programs. However, when the family of a child, or a child 14 or older, with assessed need for services available through both programs, declines enrollment in CCS, CLTS Waivers still cannot fund a service that could have been provided through CCS.** This does not mean that the child cannot be enrolled in the CLTS Waiver Program, but instead means that CLTS Waiver funds cannot be used to fund services in place of CCS. The two programs are fundamentally different, so for the most part, the services available through each program are not comparable or interchangeable.

Policy and Procedure for Serving Children who are Dually Enrolled

If a child enrolled in CCS has needs for services that are not covered by CCS but are waiver allowable, such as respite, then they should be offered an assessment for CLTS Waivers. If the CLTS Waiver Program's assessment determines the child has need for waiver funded services, the child may be dually enrolled.

For dually covered services, CCS funding must be used prior to CLTS Waivers funding. This means that when a child is enrolled in both programs, CCS covered services to address the child's mental health needs cannot be funded by CLTS Waivers. When a dually enrolled child has need for services that are

not covered by CCS, the CLTS Waivers Program can be used to fund those services if they are disability related and meet all CLTS Waivers requirements.

A child whose only mental health diagnosis is Autism Spectrum Disorder (ASD) is not eligible for CCS, so a child with ASD must have additional mental health diagnoses to be eligible for CCS.

Autism treatment is not a CCS covered service. Therefore, when a dually enrolled child has ASD, CCS services can only be used to meet needs related to the child's specific mental health diagnoses and unrelated to their ASD. **CCS cannot be used for autism therapy including Early Intensive Behavioral Intervention (EIBI) or Consultative Behavioral Intervention (CBI) services available through the CLTS Waivers.** When a child with a Developmental Disability (DD) or Physical Disability (PD) level of care is eligible for the CCS Program, CCS services can only be used to meet the child's mental health diagnoses.

Service Coordination for Dually Enrolled Children

Best practice is that a single staff person provides both CCS and CLTS Waiver case management activities to a dually enrolled child. If counties elect to provide case management in this manner, county staff must be cross-trained so that the single service coordinator/facilitator meets qualifications for both programs. Using the single staff person model, the same person acts as both the CLTS Waiver service coordinator and the CCS service facilitator. The CCS service facilitator must meet qualifications found in Wisconsin Administrative Code sec. DHS 36.10(2)(g)1 to 21 and carry out responsibilities as described in Wisconsin Administrative Code sec. DHS 36.10(e)4. The CLTS Waiver Support and Service Coordinator qualifications and responsibilities are described under SPC 604 in Chapter 4 of the Medicaid HCBW Manual.

When there is a separate CLTS Waiver service coordinator and CCS service facilitator providing case management activities for a dually enrolled child, the CLTS Waiver case management activities cannot be billed to the Medicaid card through CCS or be paid by the CLTS Waivers.

Wisconsin Medicaid does not reimburse the costs associated with ongoing monitoring and service coordination by more than one identifiable, individual case manager.

When a child is dually enrolled, best practice is to use one service plan to meet the criteria for both programs. The forms referenced below can be found online at the DHS Forms Library:

<http://www.dhs.wisconsin.gov/forms/index.htm>.

The Individual Service Plan (ISP) and signature page, DHS Form F-20445, and the Outcomes document, DHS form F-20445A are required for CLTS Waiver participants. The information provided on these forms is also needed for CCS, but additional signatures and a roster are required for CCS. For both programs, all services the child receives, regardless of funding source, paid or unpaid, must be listed on the ISP.

Services Available to Dually Enrolled Children

As noted earlier in this document, when a child is enrolled in both programs, CCS covered services must be used to address the child's mental health needs. However, when a dually enrolled child has assessed need for services that are not covered by CCS, but are CLTS Waiver allowable, those services may be funded by the CLTS Waivers Program.

CCS Services: See Attachment 1, Comprehensive Community Service (CCS) Service Array for detailed description		
Assessment	Diagnostic Evaluations and Assessments	Psychotherapy
Recovery Planning	Employment Related Skill Training	Recovery Education and Illness Management
Service Coordination	Medication Management	Substance Abuse Treatment
Communication and Interpersonal Skills Training	Physical Health and Monitoring	Non-Traditional or Other Approved Services
Community Skills Development and Enhancement	Psychoeducation	Psychosocial Rehabilitative Residential Supports

CLTS Waiver Services not covered by CCS: See Medicaid HCBS Waiver Manual for more information online at http://www.dhs.wisconsin.gov/bdds/waivermanual/index.htm		
Respite	Home Modifications	Financial Management/Fiscal Intermediary Services
Day Services	Adaptive Equipment	Housing Counseling and Start Up
Supportive Home Care	Vehicle Modifications	Personal Emergency Response System
Mentoring	Communication Aids	Specialized Transportation

The Department of Health Services has scheduled a joint teleconference for CCS Program and CLTS Waivers county and regional staff, including fiscal and other program related staff, to review the guidance provided in this memo, and respond to questions related to implementing these programs. Additional in-person training sessions will be scheduled later this spring. The teleconference to review this joint numbered memo is scheduled on **Monday, March 17, 2014, from 1:00 pm – 2:00 pm**. More details regarding the teleconference will be issued soon.

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ATTACHMENT 1: CCS Service Array