Date: December 16, 2020

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

From: James Jones, Medicaid Director
      Division of Medicaid Services

Implementation of Children's Long-Term Support Waiver Program State-Level Budget and Enrollment Administration

Purpose

The purpose of this memo is to communicate implementation of state-level budget and enrollment administration for the Children’s Long-Term Support (CLTS) Waiver Program effective January 1, 2021.

Background

The Wisconsin Department of Health Services (DHS) will implement state-level budget and enrollment administration for the CLTS Waiver Program on January 1, 2021. This change promotes statewide consistency in access, enrollment, and service planning by funding services at the state level for all enrollments.

Historically the budget allocation model and waitlist policy of awaiting additional allocations created uncertainty and slowed down enrollment momentum, resulting in variability in program access across the state.

To accommodate state-level program budgeting, DHS has developed policy and program operations that establish predictable and consistent enrollment frequency and volume at the statewide level. State-level budgeting ensures waiver program service funding for all enrollments. Eligibility and enrollment, high-cost item, and exceptional expense Individual Service Plan (ISP) policies and processes have been updated to support state-level program budgeting. Updates to the maintenance of effort (MOE) and the annual reconciliation processes to account for state-level program budgeting have also been identified and are discussed below. The MOE obligation remains unchanged.
System Enhancements

The Program Participant System (PPS) Children’s Waitlist module has been updated to support state-level enrollment administration. Updates include:

- Adding a new Yes/No field “Child Enrollable?” to the “Wait List Details” page
- Changing the “Individual’s Wait List Position” from county-specific to statewide
- Changing the field “Family Declined Services” to “Deferred Services” to accurately indicate the purpose of the use of the field
- Reflecting statewide numbering on the “Children’s Wait List Agency Report”

Instructions for the PPS Children’s Waitlist module are outlined in the CLTS Waitlist in PPS Step-by-Step Training Guide, P-00697.

General Instructions

Effective January 1, 2021, DHS will place a predetermined number of children in enrollable status the first Monday of each month according to first come, first served policy for the CLTS Waiver Program. All children in enrollable status are fully funded and CWAs must move to enroll and begin service planning immediately. DHS has projected a statewide enrollment rate that keeps pace with historical demand, resulting in elimination of the current waiting lists.

CWAs must follow eligibility and enrollment process requirements as defined by DHS. These requirements include:

- Using a standardized definition for referral and referral date
- Adhering to eligibility and enrollment timeline requirements
- Protocols for when a family chooses to defer CLTS Waiver Program enrollment

CWAs should refer to the CLTS State Level Waitlist Administration Process, P-02728, the Support and Service Coordination Requirements Eligibility and Enrollment diagram, P-02049, and the State-Level CLTS Budget and Enrollment Administration Operational Aid for CWAs: General Instructions, P-02824, for detailed information regarding these operational requirements.

Instructions for Special Circumstances

Exceptional Expense and High-Cost Notifications

Effective January 1, 2021, CWAs must operationalize exceptional expense ISP and high-cost item notifications according to the DHS tiered threshold review process.

Tier 1 and Tier 2 exceptional expense notifications require Children’s Long-Term Support (CLTS) Exceptional Expense Notification, F-02749, to be appropriately completed and returned to DHS.

Tier 1 and Tier 2 high-cost notifications require Children’s Long-Term Support Waiver High-Cost Request, F-21353, to be appropriately completed and returned to DHS. The Instructions and Typical Ranges, F-21353i, has been updated to reflect changes to the high-cost item review process and all established typical service cost ranges for adaptive aids, consumer education and training, and home modifications.

All Tier 2 exceptional expense ISP and high-cost item submissions require DHS review prior to service authorization.
The exceptional expense ISP and high-cost tiered threshold notification process does not impact the Outlier Rate Guidelines and Process, P-02274.

**Participant Moves During Enrollment**

DHS has updated policy and operations guidance regarding participant county moves during enrollment. The sending county remains responsible for notifying the receiving county, with as much advance notice as possible, of the plans to move. All enrolled participants are fully funded at the state level and receiving counties no longer enter an enrolled child in PPS to await service funding at the county-level. The receiving county should continue services with no unnecessary interruption and 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. The sending county is required to retain responsibility for the participant until the receiving county completes enrollment activities.

CWAs should refer to the State-Level CLTS Budget and Enrollment Administration Operational Aid for CWAs: Special Instructions, P-02860, for detailed information regarding operational requirements for exceptional expense ISPs, high-cost items, and participant county moves during enrollment.

**Fiscal Responsibilities**

DHS will continue to pay all allowable service expenditures provided throughout the contract year through a third party administrator (TPA). Effective January 1, 2021, CWAs no longer have a service allocation limit that generates CLTS-Overmatch when overspent.

Wis. Stat. § 46.995(2g) requires a county to maintain a specified level of contribution for the CLTS Waiver Program, often referred to as the CLTS MOE. The CLTS MOE amounts remain the same as previous years and the requirements will be met via an annual invoice issued in the 3rd quarter of the contract year to each CWA with an MOE. CLTS service authorizations and claims will no longer be used to indicate local-match funding and MOE contributions. CWAs can use county controlled funds to pay the MOE and can continue to offset some, or all, of the MOE as allowable Children’s Community Options Program or Base County Allocation expenditures.

The CLTS MOE will not be resolved as part of the annual reconciliation. The CLTS reconciliation will no longer reconcile individual CLTS funding sources. All other CLTS reconciliation processes remain in place.

Reference the State-Level CLTS Budget and Enrollment Administration Operational Aid for CWAs: Fiscal Responsibilities, P-02865, for detailed information regarding the MOE requirements and annual reconciliation process.

**Monitoring and Compliance**

DHS will monitor CWA compliance with the CLTS Waiver Program’s state-level budget and enrollment administration policies and operations to ensure an accurate state-level budget and waitlist. Monitoring activities will support CWAs in achieving continuous enrollment for the CLTS Waiver Program.