

Application for

Section 1915(b) (4) Waiver

Fee-for-Service

Selective Contracting Program

Submission Date: August 2016

v1.0

Wisconsin Children’s Long-Term Support (CLTS) Waiver Program

Table of Contents

Facesheet	3
Section A – Waiver Program Description	4
Part I: Program Overview	4
Tribal Consultation:	4
A. Statutory Authority	5
B. Delivery Systems	6
C. Restriction of Freedom of Choice	8
D. Populations Affected by Waiver	9
Part II: Access, Provider Capacity and Utilization Standards	10
A. Timely Access Standards	10
B. Provider Capacity Standards	11
C. Utilization Standards	13
Part III: Quality	13
A. Quality Standards and Contract Monitoring	14
B. Coordination and Continuity of Care Standards	16
Part IV: Program Operations	17
A. Beneficiary Information	17
B. Individuals with Special Needs.	17
Section B – Waiver Cost-Effectiveness & Efficiency	18

**Application for Section 1915(b) (4) Waiver
Fee-for-Service (FFS) Selective Contracting Program**

Facesheet

The **State** of Wisconsin requests a waiver/amendment under the authority of section 1915(b) of the Act. The Medicaid agency will directly operate the waiver.

The **name of the waiver program** Children's Long-Term Support Waiver Program.
(List each program name if the waiver authorizes more than one program.).

Type of request. This is:

- an initial request for new waiver. All sections are filled.
 a request to amend an existing waiver, which modifies Section/Part ____
 a renewal request ____

Section A is:

- replaced in full carried
over with no changes
changes noted in **BOLD**.

Section B is:

- replaced in full
 carried over with no changes
changes noted in **BOLD**.

Effective Dates: This waiver/renewal/amendment is requested for a period of 2 years beginning 01/01/2017 and ending 12/31/2019.

State Contact:

The state contact person for this § 1915(b)(4) waiver application is Deborah Rathermel. She can be reached by telephone at 608-266-9133, or by e-mail at deborah.rathermel@dhs.wisconsin.gov.

Section A – Waiver Program Description

Part I: Program Overview

Tribal Consultation:

Describe the efforts the State has made to ensure that Federally-recognized tribes in the State are aware of and have had the opportunity to comment on this waiver proposal.

On June 13, 2016, a Notice of Intent to submit a request for an Application for Wisconsin's § 1915(b)(4) FFS Selective Contracting Waiver to operate concurrently with Wisconsin's Children's Long-Term Support (CLTS) Waiver Program, a § 1915(c) Home and Community Based Services (HCBS) waiver program for children with developmental disabilities, physical disabilities, and severe emotional disturbance was sent to Wisconsin's Tribal Chairs and Health Directors. A face-to-face meeting with the Tribal Chairs was also scheduled on July 7, 2016, to discuss the CLTS Waiver Program waiver renewal and concurrent § 1915(b)(4) waiver application.

Description:

Provide a brief description of the proposed selective contracting program or, if this is a request to amend an existing selective contracting waiver, the history of and changes requested to the existing program. Please include the estimated number of enrollees served throughout the waiver.

The Wisconsin Department of Health Services (DHS) is submitting this application request for a § 1915(b)(4) FFS Selective Contracting Waiver to operate concurrently with the CLTS Waiver Program, a § 1915(c) Home and Community-Based Services (HCBS) waiver as part of the waiver renewal approval process to become effective on January 1, 2017. The § 1915(b)(4) FFS Selective Contracting Waiver is being submitted to the federal Centers for Medicare and Medicaid Services (CMS) to address potential Freedom of Choice provider concerns associated with Wisconsin's CLTS Waiver Program's support and service coordination delivery model.

The CLTS Waiver Program provides 1915(c) waiver services that supplement Wisconsin's Medicaid State Plan and Early and Periodic Screening, Diagnostic and Treatment benefit for children from birth up to 22 years. The approved § 1915(c) waiver permits DHS to provide an array of community-based services and supports to enable children who would otherwise require institutionalization, to remain in their home and community under the care of their family or guardians

Since the initial approval in January 2004, the DHS has operated the CLTS Waivers through contracts with local county human/social/community departments. Wis. Stat. chs. 48 and 51 delegate local operations to county social/human/community departments for several DHS funded and administered programs. Oversight of the CLTS Waiver Program is provided by the

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

DHS, which is the designated single State Medicaid Agency. Two divisions within the Department -- the Division of Health Care Access and Accountability and the Division of Long Term Care -- have responsibility for the oversight, operations and issuance of payments for services covered under Wisconsin's State Medicaid Plan, and covered HCBS waiver services, respectively. All CLTS Waiver Program services are prior authorized by county social/human/community departments, and delivered by their network of providers. The county waiver agency's support and service coordinator, along with the child and his/her family and friends, and other professionals work cooperatively to identify the child's needs and to secure the necessary services. All approved CLTS waiver services and supports must be included in the child's Individual Service Plan (ISP).

The purpose of this § 1915(b)(4) application for the period of 2017 – 2019, is to obtain approval from CMS for Wisconsin's county waiver agencies to facilitate and deliver support and service coordination through their employed or sub-contracted CLTS Waiver case managers. County waiver agencies are responsible to respond to requests for CLTS Waiver Program services by assessing the needs of children, authorizing appropriate services concurrently under the § 1915(c) waiver requirements, thereby maintaining successful service relationships. A renewal application for the § 1915(c) CLTS Waiver Program is simultaneously being submitted for the period of January 1, 2017, through December 31, 2021.

The CLTS Waiver Program § 1915(c) renewal application seeks to combine the three approved waivers that currently serve children with developmental disabilities, physical disabilities or severe emotional disturbance, into one single waiver. The CLTS Waiver Program also proposes several changes to bring current policies and procedures into compliance with the requirements covered under the revised HCBS Waiver § 1915(c) regulations issued in 2014.

Waiver Services:

Please list all existing State approved 1915(c) waiver services the State will provide through this selective contracting waiver.

CLTS Waiver Program CMS-Approved Waiver Services:

- Support and Service Coordination
- Child Foster Care services
- Online or purchased goods and equipment

A. Statutory Authority

1. **Waiver Authority.** The State is seeking authority under the following subsection of 1915(b):
 X **1915(b)(4) - FFS Selective Contracting program**
2. **Sections Waived.** The State requests a waiver of these sections of 1902 of the Social Security Act:

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

- a. Section 1902(a) (1) - Statewide
- b. Section 1902(a) (10) (B) - Comparability of Services
- c. Section 1902(a) (23) - Freedom of Choice
- d. Other Sections of 1902 – (please specify)

B. Delivery Systems

1. **Reimbursement.** Payment for the selective contracting program is:

- the same as stipulated in the State Plan
- different than stipulated in the State Plan (please describe)

The reimbursement methodology for Wisconsin's current § 1915(c) CLTS Waiver Program is described in the current renewal application and is also described in this 1915(b)(4) Waiver Fee-for-Service Selecting Contracting Application proposal as follows:

Administrative Costs:

The structure of Wisconsin's county social/human/community service agency functions includes the following:

- 1) Designated county waiver agency responsible for the local operations and delivery of Support and Service Coordination functions, including:
 - a. Determining the child's institutional level of care eligibility via the Department's online CLTS Functional Screen automated tool
 - b. Conducting assessments to determine each eligible child's needs and outcomes
 - c. Coordinating other program services and benefits to ensure CLTS waiver services are accessed as the payer of last resort, including:
 - Early and Periodic Screening, and Diagnostic Treatment benefits, known as HealthCheck in Wisconsin
 - Medicaid State Plan benefits
 - Services covered under the child's private health insurance
 - Department of Public Instruction's special education services under the federal Individuals with Disabilities Education Act Part B
 - Department of Workforce Development's Division of a Vocational Rehabilitation Services under the federal Rehabilitation Act of 1973, or the Workforce Innovation and Opportunity Act
 - County administered programs, including:
 - Child protective and welfare services, such as Foster Care and Kinship Care services
 - Juvenile justice services
 - Mental health services
 - Income Maintenance programs, such as Child Care, FoodShare and housing benefits

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

- 2) Authorizing appropriate waiver services to meet the needs of eligible children and their families
- 3) Delivering the following CLTS waiver services as the direct service provider:
 - a. Support and Coordination Services
 - b. Allowable services for children placed in Foster Care
 - c. Reimbursement for purchased goods and equipment (e.g., economical online or other purchased goods, such as iPads)

DHS will reimburse county waiver agencies with the federal share of actual service and administrative expenditures, as reported on the financial report certified as accurate by the county waiver agency's auditing firm and submitted to DHS, the DHS/county waiver agency's cost settlement process and the county's audited financial reports. The amount reimbursed will be determined in compliance with the federal Office of Management and Budget (OMB) and A-87 auditing principles. County waiver agencies are bound by their State-County contracts to assure their service charges are determined consistent with federal generally accepted accounting principles and OMB Circular A-87.

CLTS Waiver Payment for Services:

CLTS waiver service prior authorizations are submitted by the county waiver agency to the DHS contracted third party administrator claims vendor for the CLTS Waiver Program, Wisconsin Physicians Service (WPS). WPS adjudicates and pays or reimburses county waiver agencies for allowable covered services according to established business rules.

Flow of Billings:

Claims for services provided to CLTS Waiver Program participants, whether delivered by a county waiver agency or a qualified provider, as authorized by the county waiver agency, are billed directly to WPS in accordance with policies and procedures published in detail in the DHS State-County contract. The county waiver agency may also choose to use a fiscal intermediary for family-directed services and supports. WPS issues payments and draws funding from an established Wisconsin Department of Administration (DOA) established account. WPS issues notice of the anticipated payments for the county waiver agencies and other service providers for allowable services on a daily basis. DHS reviews and notifies WPS of the approval of the payment, or if there is a reason to hold the payment. WPS then issues the payment, which is drawn from the Wisconsin DOA established account.

2. **Procurement.** The State will select the contractor in the following manner:

- Competitive** procurement
- Open** cooperative procurement
- Sole source** procurement
- Other** (please describe)

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

DHS contracts with county social/human/community departments, as governmental entities under Wisconsin's Constitution representing the 72 counties, to operate the CLTS Waiver Program according to the state's established policies and procedures and perform Support and Service Coordination functions, under the authority of Act No. 80 of the Public Acts of 1905, as amended.

DHS provides a variety of oversight activities to ensure each county waiver agency complies with the operational requirements of the CLTS Waiver Program. This includes on-site monitoring and record review activities, the Single State Audit process, and activities by the DHS regional Area Administration staff, who are responsible for ensuring compliance with county contractual program requirements, including:

- (a) The organization has established processes, policies, and procedures necessary to achieve the required result.
- (b) The established statewide processes, policies, and procedures are properly implemented.
- (c) The expected result of the processes, policies, and procedures is being achieved.

DHS program operation standards require compliance with the following areas: governance and mission; staff qualifications and training requirements, quality assurance and improvement requirements; personnel and resource management; fiscal management; eligibility and initial screening; waiting lists management; assessment of the needs of children and their families, authorization of array of covered waiver services to meet those needs, issuance of individual service plan for each eligible child, and the conflict free assurance and delivery of the DHS allowable CLTS waiver services.

C. Restriction of Freedom of Choice

1. Provider Limitations.

- Beneficiaries will be limited to a single provider in their service area.
- Beneficiaries will be given a choice of providers in their service area.

(NOTE: Please indicate the area(s) of the State where the waiver program will be implemented)

DHS administers the CLTS Waiver Program on a statewide basis in all 72 Wisconsin counties.

2. State Standards.

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

Detail any difference between the state standards that will be applied under this waiver and those detailed in the State Plan coverage or reimbursement documents.

Waiver service providers are held to the same standards for reimbursement, quality, and utilization as other providers of Medicaid State Plan services, and the standards are consistent with access, quality, and efficient provision of covered care and services.

D. Populations Affected by Waiver

(May be modified as needed to fit the State's specific circumstances)

1. **Included Populations.** The following populations are included in the waiver:

- Section 1931 Children and Related Populations
- Section 1931 Adults and Related Populations
- Blind/Disabled Adults and Related Populations
- Blind/Disabled Children and Related Populations
- Aged and Related Populations
- Foster Care Children
- Title XXI CHIP Children
- other -- participants enrolled in the § 1915(c) CLTS Waiver Program

2. **Excluded Populations.** Indicate if any of the following populations are excluded from participating in the waiver:

- Dual Eligibles
- Poverty Level Pregnant Women
- Individuals with other insurance
- Individuals residing in a nursing facility or ICF/MR
- Individuals enrolled in a managed care program
- Individuals participating in a HCBS Waiver program
- American Indians/Alaskan Natives
- Special Needs Children (State Defined). Please provide this definition.
- Individuals receiving retroactive eligibility Other (Please define):

This note is added for clarity: Within the group of beneficiaries enrolled in the HCBS § 1915(c) CLTS Waiver Program, there are no excluded populations.

Part II: Access, Provider Capacity and Utilization Standards

A. Timely Access Standards

Describe the standard that the State will adopt (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State has adopted) defining timely Medicaid beneficiary access to the contracted services, *i.e.*, what constitutes timely access to the service?

1. How does the State measure (or propose to measure) the timeliness of Medicaid beneficiary access to the services covered under the selective contracting program?

DHS uses the performance measures listed in its § 1915(c) CLTS Waiver Program as a method to measure the timeliness of a waiver participant's access to the services covered under the selective contracting program.

The contract between DHS and the county waiver agencies establishes standards for access to CLTS waiver services. These standards provide the framework to address all populations that may seek or request covered waiver services including children with developmental disabilities, physical disabilities, and severe emotional disturbance.

Children determined eligible to participate in the CLTS Waiver Program must be enrolled in a Medicaid program (BadgerCare Plus, Foster Care, Supplemental Security Income, Katie Beckett Program, Wisconsin Works, etc.) and are not placed on a waiting list for accessing Medicaid State Plan services. The county waiver agencies are required to provide CLTS waiver covered services and supports beyond what is available under the Medicaid State Plan to meet the assessed needs of children and their families. The eligibility and access process for the CLTS Waiver Program is fully described in the concurrent § 1915(c) waiver renewal application.

The comprehensive annual site review and Single State Audit activities described in the HCBS § 1915(c) CLTS Waiver Program renewal application is an essential vehicle for ensuring that Wisconsin's home and community-based waivers are operated in a manner that meets the federal assurances and subassurances.

2. Describe the remedies the State has or will put in place in the event that Medicaid beneficiaries are unable to access the contracted service in a timely fashion

If deficiencies are identified during the CLTS Waiver Program site reviews or the Single State Audit process, county waiver agencies are provided with technical assistance by the DHS assigned children's services specialists. In instances where there are systemic issues that must be resolved, the county waiver agency must

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

submit a plan of correction to DHS within 30 calendar days of receiving the results of the DHS summary report, and must indicate the steps taken to remediate the deficiency. In addition, participants have the right to request both local dispute resolution sessions and Fair Hearing Administrative Hearings if they are dissatisfied with the county waiver agency's services or with access to services.

B. Provider Capacity Standards

Describe how the State will ensure (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State has ensured) that its selective contracting program provides a sufficient supply of contracted providers to meet Medicaid beneficiaries' needs.

1. Provide a detailed capacity analysis of the number of providers (e.g., by type, or number of beds for facility-based programs), or vehicles (by type, per contractor for non-emergency transportation programs), needed per location or region to assure sufficient capacity under the selective contracting program.

The DHS submission of this § 1915(b)(4) waiver application in concurrence with the CLTS Waiver Program § HCBS 1915(c) waiver renewal application, is intended to preserve Wisconsin's statutorily mandated county service delivery mechanism that best meets the complex and multi-systemic needs of children from birth up to age 22 years, who have significant developmental disabilities, physical disabilities, and severe emotional disturbance. This § 1915(b)(4) waiver application will not impact the current manner in which the § 1915(c) CLTS Waiver Program has operated since its inception on January 1, 2004.

Each county waiver agency's "catchment area" is comprised of one or more counties that are contracted with DHS to operate the CLTS Waiver Program according to the established statewide policies and procedures. DHS prohibits county waiver agencies from establishing their own local policies and procedures in replacement of the state's approved procedures. The county waiver agency is responsible to determine CLTS Waiver Program eligibility and enroll eligible applicants who reside in their counties -- either through its allocated CLTS Waiver Program resources or through an agreement with the "county of financial responsibility" (i.e., the county waiver agency serving the county that's responsible for the child's foster care placement or court order). The DHS State-County CLTS Waiver Program contract specifies the county waiver agency is responsible for delivering timely Support and Service Coordination activities to fulfill their obligations and meet the needs of CLTS Waiver Program applicants and participants.

The proxy for the county waiver agency having "adequate capacity" of qualified Support and Service Coordination providers is:

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

- 1) Timely access to CLTS Waiver Program enrollment, based on the DHS statewide first-come, first-served wait list policies;
- 2) CLTS waiver participants' assessments and authorizations for waiver services are provided as needed and planned; and
- 3) CLTS waiver participants / families express satisfaction with their support and service coordination activities.

The CLTS Waiver Program onsite review process includes a review of the child's Individual Service Plan (ISP) for each randomly selected participant. Each child's ISP is compared with assessment and corresponding budget and encounter waiver claims paid by WPS for the specified time frame. One purpose of this aspect of the CLTS Waiver Program onsite review is to determine if services are provided in type, amount and duration as needed, and as identified on the ISP. If services were not provided as needed and planned, the EQRO looks for an explanation as to why not. If the reason was due to issues regarding the access or availability of qualified direct service providers, the EQRO reviews the documentation of the steps taken by the county waiver agency to address the problem. If the problem has not been resolved during the time of the CLTS waiver onsite review, the county waiver agency must address the issue in its plan of correction (POC). Another aspect of the site review is to ascertain CLTS Waiver Program consumer and family satisfaction with services. If the consumer or family expresses dissatisfaction with the availability of or access to qualified direct service providers, the EQRO looks for documentation as to what strategies the county waiver agency has implemented to address the consumer's / family's concerns.

2. Describe how the State will evaluate and ensure on an ongoing basis that providers are appropriately distributed throughout the geographic regions covered by the selective contracting program so that Medicaid beneficiaries have sufficient and timely access throughout the regions affected by the program.

If deficiencies are identified by the DHS EQRO during the annual CLTS Waiver Program onsite reviews and Single State Audit activities, county waiver agencies must submit a plan of correction to DHS within 30 calendar days of receiving the CLTS Waiver Program summary report and must indicate the steps taken to remediate the deficiency. The DHS Bureau of Children's Service program integrity quality assurance section follows up with the county waiver agency within 90 calendar days of approving the plan of correction to assure it has been implemented.

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

C. Utilization Standards

Describe the State's utilization standards specific to the selective contracting program.

1. How will the State (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State) regularly monitor(s) the selective contracting program to determine appropriate Medicaid beneficiary utilization, as defined by the utilization standard described above?

The "utilization standard" is that participants receive authorized CLTS waiver services in the amount, scope and duration as identified in the children's ISP. As noted above, the EQRO onsite record review process includes a review of the ISP for each randomly selected participant. Each ISP is compared with the child's assessment, the corresponding budget, and with the waiver services billed to WPS for the specified time frame. One purpose of this aspect of the onsite review is to determine if services have been provided in the type, amount and duration as identified on the IPS. If services were not provided as needed and planned, the EQRO looks for explanation as to why not. If the reason was due to issues regarding the access or availability of qualified service providers, the EQRO looks for documentation of the steps taken by the county waiver agencies to address the problem. If the problem has not been resolved at the time of the site review, the county waiver agency must address the issue in its plan of correction. Another aspect of the onsite review is to ascertain consumer and family satisfaction with services. If the consumer or family expresses dissatisfaction with the availability of or access to the qualified service providers, the EQRO looks for documentation as to the strategies the county waiver agency has implemented to address the family's concerns.

2. Describe the remedies the State has or will put in place in the event that Medicaid beneficiary utilization falls below the utilization standards described above.

If deficiencies are identified during the CLTS Waiver Program's onsite record reviews, county waiver agencies must submit a plan of correction to DHS within 30 calendar days of receiving the DHS summary report and must indicate the steps taken to remediate the deficiency. The Division of Long Term Care's Bureau of Children's Services program integrity staff follows up with the county waiver agency within 90 calendar days of approving the county's plan of correction to assure it has been implemented. In addition, CLTS waiver participants have the right to request a Fair Hearing through the Department of Administration's Division of Hearing and Appeals if they are dissatisfied with services or with access to services.

Part III: Quality

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

A. Quality Standards and Contract Monitoring

1. Describe the State's quality measurement standards specific to the selective contracting program.
 - a. Describe how the State will (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State):
 - i. Regularly monitor(s) the contracted providers to determine compliance with the State's quality standards for the selective contracting program.

Since the proposal for this § 1915(b)(4) waiver will operate concurrently with a § 1915(c) waiver, evidence of monitoring is submitted as part of the annual CMS 372 Report; specifically, as documentation of the CMS-approved performance measures.

- ii. Take(s) corrective action if there is a failure to comply.

The process for monitoring, including corrective action, is described in #2, below.

2. Describe the State's contract monitoring process specific to the selective contracting program.
 - a. Describe how the State will (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State):
 - i. Regularly monitor(s) the contracted providers to determine compliance with the contractual requirements of the selective contracting program.

Wisconsin's Quality Management Program (QMP) focuses on the CLTS Waiver Program operated by the county waiver agencies, including the current § 1915(c) waiver requirements, with which this § 1915(b)(4) waiver operates concurrently. The county waiver agencies must adhere to the same standards of care for each individual served and each county waiver agency must meet the standards detailed in the DHS State/County CLTS Waiver Program contract and CLTS Waiver Program Manual.

The DHS Division of Long Term Care's Bureau of Children's Services and Area Administration staff are responsible for implementing the contractual program operating requirements for all county waiver agencies.

An EQRO onsite review team conducts comprehensive annual record reviews at county waiver agencies, applying a DHS approved CLTS Waiver Program record

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

review tool as well as other program data, to ensure that the programs are operated in a manner that meets the federal assurances and sub-assurances. This CLTS Waiver Program annual site visit strategy covers a selected sample of participants enrolled in the program, with rigorous standards for assuring the health and welfare of the waiver participants.

The comprehensive onsite reviews include the review of the county waiver agency's personnel records to ensure all support and service coordinators meet the DHS provider credential qualifications, have been screened according to Wisconsin's caregiver background check requirements, and have successfully completed the established training and competency testing requirements prior to delivering case management activities, as required by the policies published in the current Wisconsin Home and Community-Based Waiver Manual (DHS is also in the process of publishing a dedicated CLTS Waiver Program Manual). The EQRO also conducts a review of the waiver participant's service claims to ensure the services billed were identified on the ISP as appropriate to meet the identified needs of the children and families; reviews the county waiver agency's submission of participant incident reports of abuse, neglect or maltreatment, to verify the process is being implemented per established policies; reviews and verifies that restrictive measures applications are being operated as per the established policies; and follow up on reported incidents to assure the county waiver agencies are not using restraints or seclusion as detailed in Wisconsin's CLTS Waiver Program policies and procedures.

The annual EQRO review of county waiver agencies' records, as well as review of CLTS Waiver Program data reports, are the primary source for discovery and remediation for the CLTS Waiver Program's approved performance measures. DHS staff compile a proportionate random sample at the 95% confidence level for the annual onsite record review for the CLTS Waiver Program. At the onsite review, CLTS waiver participant records are reviewed to ensure compliance with the DHS standards in determining the child's functional institutional level of care requirements, Medicaid financial and non-financial requirements, and proper assessment and outcome determinations. The EQRO's selected record sample also includes a review of the CLTS waiver participants' ISPs to ensure it:

- Includes services and supports that align with and address all assessed needs
- Addresses health and safety risks
- Is developed in accordance with the DHS policy and procedures, including utilizing person-centered/family-centered planning
- Is updated as needs change, and at least annually

Effective with the CMS review and approval of the § 1915(c) CLTS Waiver Program effective for January 1, 2017, the EQRO onsite review staff will conduct

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

interviews with at least one child and family whose record is selected in the proportionate random sample. The EQRO review staff use a standard record review protocol that contains questions about such topics as awareness of grievance and appeals mechanisms, person-centered planning and satisfaction with services. Interviews may be conducted over the telephone or at the child's home.

- ii. Take(s) corrective action if there is a failure to comply.

A report of the EQRO's findings from the onsite record reviews is disseminated to the county waiver agencies with requirements that a plan of correction be submitted for any identified systemic deficiencies to DHS in 30 calendar days. The Bureau of Children's program integrity staff conduct follow-up activities to ensure that remediation of identified deficiencies are brought into compliance within 90 calendar days after the plan of correction is approved by the Department.

B. Coordination and Continuity of Care Standards

Describe how the State assures that coordination and continuity of care is not negatively impacted by the selective contracting program.

As previously noted, this § 1915(b)(4) waiver application does not impact the current manner in which the approved CLTS §1915(c) waiver program has operated since its inception. Under Wis. Stat. chs. 51 and 48, designated county waiver agencies are mandated as being responsible for the local CLTS Waiver Program operations, including the development of an ISP for all participants residing in the county. Chapter 48, also known as "The Children's Code" applies to other county delivered services and crisis interventions to best meet the needs of children and families, such as the Birth to 3 Program, Children's Community Option Program, child protection services, child welfare services, juvenile justice services, mental health services, and economic support services.

The CLTS waiver participant's ISP must be grounded in the appropriate assessment and outcomes that meet the needs of each child and her/her family, and must identify all available services and resources to be provided to the participant — both CLTS waiver services as well as other program services and supports. Support and service coordinators must be employees of the county waiver agencies or employees of an agency under contract to the county waiver agency. The county waiver agencies must report and verify any sub-contractor's business associate agreements, confirming their business relationship and assurance of all federal security and privacy regulation compliance, before the Bureau of Children's Service's program integrity section will permit the employees' access to the DHS CLTS Waiver systems. These systems include the Enrollment and Eligibility Streamlining, CLTS Functional Screen, Wisconsin's Medicaid Management Information System (MMIS), Children's Incident Tracking and Reporting system, Wisconsin Provider

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

Management system, the WPS authorization and claims processing system, as well as the DHS comprehensive data ware house. Therefore, by identifying the county waiver agencies as the DHS sole selected Support and Service Coordination FFS contracting program, the CLTS Waiver Program's participants' are assured of comprehensive coordination of care that will best meet the complex needs of children with significant disabilities and their families.

Part IV: Program Operations

A. Beneficiary Information

Describe how beneficiaries will get information about the selective contracting program.

The DHS *Children's with Delays and Disabilities* web site provides information about the CLTS Waiver Program and directs individuals their local county waiver agency to determine eligibility and access needed CLTS Waiver Program services, as well as other appropriate county-administered supports and services including the Birth to 3 Program, the Children's Community Options Program, as well as referral and resource information via the regional Division of Public Health's Children and Youth with Special Health Care Needs.

B. Individuals with Special Needs.

 X The State has special processes in place for persons with special needs (Please provide detail).

Each county waiver agency must have an intake unit or function that acts as the "front door" of the county's operations and conveys a helpful and informative process for applicants and participants wishing to access Wisconsin's Children's Long-Term Support services, as well other services available within the county human/social/community service department.

Accessing CLTS Waiver Program services must be available to all Wisconsin residents, regardless of where the person lives, or where he/she contacts the system. The county waiver agency must arrange for in-person intake services, and an access line that is available 24 hours per day, seven days per week, and via telephone device for the deaf (TDD) for hearing-impaired individuals. Telephone lines must be toll-free and accommodate people with Limited English Proficiency (LEP) and other linguistic needs, and must accommodate persons with diverse cultural and demographic backgrounds, visual impairments, and alternative needs for communication and mobility challenges.

The special needs of all consumers must be accommodated — whether the need is access to particular mental health or crisis specialists; accommodations to address any visual, hearing, mobility, communication, physical, developmental, or other challenges; geographic accessibility and transportation issues; etc. In addition, county waiver agencies must assure equal access for people with diverse cultural backgrounds,

Wisconsin Children’s Long-Term Support (CLTS) Waiver Program

language of choice, and/or limited English proficiency as per federal civil rights requirements, and that services and supports provided by the county waiver agency demonstrate a commitment to the population’s linguistic and cultural competencies to assure meaningful participation for all people in the service area.

The CLTS Waiver Program requires that all participant’s ISPs are developed using a “person-centered planning” (PCP) process. The principles inherent in the PCP process dictate that each consumer’s special needs are accommodated in both the planning process and the ISP. For children, the concepts of PCP are incorporated into a family-driven, youth-guided approach that recognizes the importance of family in the lives of children and that supports and services impact the entire family. In the case of minor children, the child/family is the focus of planning and family members are integral to success of the planning process. As the child ages, services and supports become more youth-guided especially during transition into the adulthood waiver support and service delivery system. When the individual reaches adulthood, his or her needs and goals become primary.

Section B – Waiver Cost-Effectiveness & Efficiency

Efficient and economic provision of covered care and services:

1. Provide a description of the State’s efficient and economic provision of covered care and services.

The CLTS Waiver Program -- since its inception in January 2004 -- has reimbursed county waiver agencies on a fee-for-service basis as the sole entity responsible for providing the CLTS Waiver Support and Service Coordination and Foster Care supplemental waiver services to participants. Changing the current county administered support and service coordination function would require a major revision to the DHS delivery of the CLTS waiver funding allocations, and would decrease the efficiencies and cost effectiveness of the administration of this program. In addition, it would cause a great deal of confusion for individuals applying for and/or currently receiving CLTS waiver services through their local county department of human/social/community services.

It is not possible to supply data comparing “fee-for-service cost trends for comparable services experienced prior to introduction of the selective contracting waiver, outside the geographic region covered by the selective contracting waiver or in the commercial marketplace...”

As per this § 1915(b)(4) waiver application request, Wisconsin’s actual CLTS Waiver Program expenditures will not exceed projected expenditures for the prospective years; and actual expenditures for the prospective years for the concurrent CLTS Waiver Program’s § 1915(c) waiver will continue to meet the federal “cost-neutrality” requirements.

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

2. Project the waiver expenditures for the upcoming waiver period.

Year 1 from: 01/01/2017 to 12/31/2017

Trend rate from current expenditures (or historical figures): 1.1%

Projected pre-waiver cost NA
Projected Waiver cost \$1,877,612
Difference: NA

Projected PMPM \$258.45

Year 2 from: 01/01/2018 to 12/31/2018

Trend rate from current expenditures (or historical figures): 1.1%

Projected pre-waiver cost NA
Projected Waiver cost \$2,065,373
Difference: NA

Projected PMPM \$261.30

Year 3 (if applicable) from: __/__/__ to __/__/__

(For renewals, use trend rate from previous year and claims data from the CMS-64)

Projected pre-waiver cost _____ Projected
Waiver cost _____
Difference: _____

Year 4 (if applicable) from: __/__/__ to __/__/__

(For renewals, use trend rate from previous year and claims data from the CMS-64)

Projected pre-waiver cost _____
Projected Waiver cost _____
Difference: _____

Year 5 (if applicable) from: __/__/__ to __/__/__

Wisconsin Children's Long-Term Support (CLTS) Waiver Program

(For renewals, use trend rate from previous year and claims data from the CMS-64)

Projected pre-waiver cost _____

Projected Waiver cost _____

Difference: _____