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To: County Human Services Directors

From: Camille Rodriguez, Director, Bureau of Children's Services

Key Points Regarding the Transition from Children's to Adult Long Term Support Services

The Department of Health Services (DHS), Division of Long Term Care (DLTC) is the designated State Medicaid Agency for Wisconsin's Home and Community-Based Services (HCBS) Waiver programs and exercises sole authority in establishing Medicaid Waiver policies, including the implementation of uniform policies for individuals waiting to receive services on a statewide basis.

The purpose of the information contained in this letter is to provide direction for County Waiver Agencies (CWAs) to assist participants of Children's Long-Term Supports (CLTS) programs, including CLTS Waivers, Family Support Program (FSP), and Community Options Program (COP) in a smooth transition to adult waiver services, including Family Care, Partnership or Include, Respect, I Self-Direct Program (IRIS).

Eligibility for Immediate Services

In counties that have implemented Family Care, Partnership and IRIS, young adult CLTS Waiver participants, 18 years of age and less than 22 years of age, determined functionally and financially eligible for Family Care, Partnership or IRIS, must be enrolled in those programs without delay. Counties transitioning to Family Care, Partnership and IRIS must not place the names of young adults at least 18 years of age, and less than 22 years of age, on the adult waiver program wait list. Eligibility for immediate enrollment means the Aging and Disability Resource Center (ADRC) does not consider these individuals as those requiring enrollment from the ADRC wait list during the county's transition period.

Disability Determination

Individuals may be enrolled in Family Care or IRIS without first obtaining a disability determination from the Disability Determination Bureau. However, the disability determination may be required for establishing Medicaid eligibility.

Enrollment Date

The DHS expects the enrollment date for Family Care, Partnership and start date for IRIS, to be as close to the participant's 18th birthday as possible. During the county's initial transition period from CLTS Waiver to Family Care, Partnership and IRIS, the enrollment date (i.e., the start date) must occur on the first day of the month after the young adult turns age 18. After the county's initial transition phase from CLTS Waivers to Family Care, Partnership and IRIS, when the individuals on the wait list are being enrolled, the enrollment date for Family Care and Partnership will remain the first day of the month. For IRIS, the enrollment date can be any day of the month.

Family Care and Partnership

The enrollment date for Family Care and Partnership is the earliest date on which the person meets all eligibility requirements. The enrollment date can occur as early as the first day of the month in which the person turns 18 years of age and is a date mutually agreed upon by the individual, the ADRC, and the CLTS Support and Service Coordinator.

IRIS

The IRIS start date is the earliest date on which the person meets all eligibility requirements and has an approved IRIS plan. This date cannot occur before the person's 18th birthday and is a date when all required elements are met and agreed upon by the IRIS Consultant Agency (ICA), the CLTS Support and Service Coordinator, and the individual.

Roles and Responsibilities

CLTS Waiver

Coordination between the CWA and the ADRC is critical to ensure that young adults with disabilities experience a smooth transition to adult long-term supports and to avoid gaps in services. All costs associated with the individual's CLTS Waiver service, including the cost of support and service coordination, remain reimbursable through CLTS until the date of enrollment in Family Care, Partnership or IRIS.

CWAs must plan for the child's transition to adult long-term care by the time the child is 17 years and 6 months old:

1. The CLTS Support and Service Coordinator must refer the young adult to the ADRC to begin the process of transitioning into the adult long-term care system.
2. The referral is documented within the individual's record and reasonable steps must be taken to ensure continuity of services as the person reaches adult status.
3. If a young adult does not meet eligibility criteria for adult long-term care, then transition planning for other community supports and services should be considered while the youth remains enrolled in the CLTS Waiver and/or in FSP. This is required as long as the young adult continues to meet eligibility requirements or until the young adult's 22nd birthday.
4. When a young adult (at least 18 years of age and less than 22 years of age) is enrolled in Family Care, Partnership or IRIS, she/he is no longer eligible for CLTS Waiver, the Family Support Program (FSP) or Community Options Program (COP). It remains the young adult's/family's choice whether to enroll in Family Care, Partnership or IRIS; however, if the young adult is eligible for Family Care, Partnership or IRIS but chooses not to enroll, then the young adult is no longer eligible for CLTS Waiver, FSP or COP, and the CWA will send an official notification to the participant or guardian with the date of termination of these programs.

FSP and COP

A FSP or COP participant turning 17 years and 6 months old or older (who is not participating in the CLTS Waiver) must be referred to the ADRC to determine if the person is eligible for Family Care, Partnership or IRIS. A referral assures the person receives:

1. Enrollment and/or Options Counseling;
2. An adult long-term care functional eligibility determination;
3. A financial referral to Income Maintenance; and
4. Placement on the adult long-term care wait list, if eligible.

In preparation for, and throughout the transition period, young adults currently receiving only FSP or COP funded services, must be immediately placed on the CLTS wait list in the Program Participation System (PPS). Adding the young adult to the CLTS wait list in PPS assures he/she will be served in a first come first served priority. No disruption of services should occur for the young adult. If the young adult is not placed on the wait list when he/she turns age 17 years and 6 months, then the ADRC will add the young adult to the bottom of the current adult long-term care wait list.

If the young adult is only eligible for the FSP, the child may continue in the FSP while on the wait list until the child's 22nd birthday, as long as all eligibility requirements for the FSP are met. As the young adult nears age 22, the Family Support Program Coordinator should review with the ADRC when the young adult will transition to ensure no disruption of services for the young adult.

When a young adult (at least 18 years of age and less than 22 years of age) is enrolled in Family Care, Partnership or IRIS, she/he is no longer eligible for FSP. It remains the young adult's/family's choice whether to enroll in Family Care, Partnership or IRIS; however, if the young adult is eligible for Family Care, Partnership or IRIS but chooses not to enroll, then the young adult is no longer eligible for FSP.

CLTS Waivers and FSP and COP

Ongoing communication between the CWA and ADRC is necessary to ensure continued services until the time of enrollment in Family Care, Partnership or IRIS. The DHS expects local agencies to work together to define the process used by the CWA to refer young adults to the ADRC, and how the ADRC intends to notify the CWA regarding the outcome of the referral:

1. Upon eligibility determination of the young adult's program of choice, the ADRC conveys the program selection to the CWA. Notification also includes the Family Care or Partnership enrollment date or the date an IRIS referral was made.
2. If the young adult is not eligible for Family Care, Partnership or IRIS, the ADRC and CWA can discuss other options with the young adult and/or the guardian.

Restrictive Measures

Restrictive measures can be critical to a young adult's participation in the community. When needed, it is imperative that the CLTS-approved restrictive measures application remains in effect during the transition, and that the participant's experience is seamless.

When a CLTS Waiver participant has an approved CLTS restrictive measures application at the time of transition, complete the following procedures:

1. The CWA must inform the adult long-term care program of the approved CLTS restrictive measures application.
2. If a young adult is enrolling into adult long-term care and the transition is only a program change (from CLTS to Family Care, Partnership or IRIS), then a new application is *not* necessary as long as the approval remains current.
3. If the young adult's support plan is changing such that those responsible for implementation of the plan will be *different* than previously approved, or the restrictive interventions will change, an updated application should be submitted in preparation for the transition.
 - a. The CWA and adult long-term care program work together to ensure a smooth transition between the approved CLTS restrictive measure and the approval process for the adult restrictive measures application.
 - b. The CLTS restrictive measure plan ends at the time the young adult has an approved adult restrictive measure application.

Youth Living in Substitute Care Settings

For enrollment in Family Care, Partnership or IRIS, children age 17 years 6 months and older, living in children's substitute care settings, must be functionally and financially eligible for these programs. The full-benefit Medicaid programs that most often apply to these individuals are Foster Care Medicaid, BadgerCare Plus and Supplemental Security Income (SSI) Medicaid.

In order to ensure a smooth transition, early collaboration between the responsible CWA, the provider, the ADRC, and the managed care organization (MCO) or IRIS consultant agency (ICA) is important. The referral to the ADRC should occur when the child reaches the age 17 years 6 months. In situations where the young adult is transitioning to adult long-term care services, but will remain in the current substitute care setting and the current substitute care setting plans to be licensed or certified as an adult setting (for example, Children's Foster Home becomes an Adult Family Home), careful planning and attention is required to ensure a timely transition.

The adult long-term care program enrollment date for young adults residing in substitute care settings may be later than her/his 18th birthday when the young adult remains in substitute care under Wis. Stats. Chapter 48 Children's Code (Child Protective Services court order / Extension of Out-of-Home Care order) or under a Voluntary Transition to Independent Living Agreement. In these situations the young adult continues with the CLTS Waiver until the date of discharge from the children's substitute care placement; the date the children's setting is licensed or certified as an adult setting; or when it is determined that transitioning to Family Care, Partnership or IRIS is appropriate. The transition to Family Care, Partnership or IRIS must occur no later than the young adult's 22nd birthday.

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Cc: ORCD

ADRCs

BMC

Family Care

Partnership

Compass Wisconsin Threshold

MCOs

ICAs

Office of IRIS