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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: Curtis J. Cunningham, Assistant Administrator for Benefits and Service Delivery
Division of Medicaid Services

A handwritten signature in black ink, appearing to read 'Curtis J. Cunningham'.

COVID-19 Public Health Emergency Unwinding for the Children's Long-Term Support Waiver Program and Children's Community Options Program

Purpose

This memo outlines required county waiver agency (CWA) actions necessary to unwind temporary policy flexibilities for the COVID-19 public health emergency (PHE) in accordance with the [end of the PHE on May 11, 2023](#) and federal PHE unwinding requirements ([State Health Official Letter 20-004](#)). Guidance in this memo applies to the Children's Long-Term Support (CLTS) Waiver Program and the Children's Community Options Program (CCOP), hereafter referred to collectively as "CLTS Programs," unless otherwise noted.

"Unwinding" is the federal government's term to describe the steps state Medicaid agencies must take to re-establish regular eligibility, enrollment, and benefits management processes. "Flexibilities" are the CLTS Programs' temporary policy exceptions for the COVID-19 PHE, outlined on the COVID-19: CLTS Program Operations Questions and Answers web page (www.dhs.wisconsin.gov/covid-19/clts.htm). Flexibilities remain in effect until end dates specified in this memo.

Background

A federal [PHE](#) began on January 27, 2020, in response to the COVID-19 pandemic. During the PHE, CLTS Programs used allowable flexibilities under the following authorities:

- An emergency § 1915(c) Appendix K ([P-02701](#))¹
- [CLTS § 1915\(c\) waiver](#)

¹ Flexibilities in the [CLTS Appendix K](#) that were approved by the Centers for Medicare & Medicaid Services but not implemented due to either insufficient current resources to support implementation or a DHS determination that they were not necessary include: home-delivered meals service; modify allowed provider types for assistive technology and communication aids (add general retailers) and transportation (add transportation network companies) services; allow retainer payments to address emergency related issues; allow noncompliance with the HCBS settings requirement that individuals are able to have visitors of their choosing at any time; provider qualifications that allow for all services other individual or agency providers appropriately qualified as approved by the participant and county waiver agency, and modify service providers for home-delivered meals to allow for additional providers, including non-traditional provider; and adjust prior approval/authorization elements approved in the waiver.

- [Wis. Admin. Code ch. DHS 1.065\(3m\)\(c\)](#)

These exceptions collectively provided the flexibility necessary to maintain participants' access to needed health care, supports, and services during the PHE.

PHE unwinding timelines

Flexibilities with the following federal authority are allowed only temporarily and may not continue after the effective dates for this authority:

- [CLTS Appendix K](#) effective dates are March 1, 2020, through no later than six months after the expiration of the PHE, with the exception of the flexibility to suspend involuntary disenrollments. The end date of the flexibility to suspend involuntary disenrollments is March 31, 2023, in accordance with the March 31, 2023, end of continuous enrollment condition in the [Families First Coronavirus Response Act](#) § 6008(b)(3) as amended by the [Consolidated Appropriations Act 2023 \(H.R. 2617\)](#).

Flexibilities and PHE unwinding requirements

I. Eligibility, enrollment, and disenrollment

Resuming annual functional eligibility redeterminations

Due dates (level of care (LOC) end dates) for CLTS Programs annual functional eligibility redeterminations done via the CLTS Functional Screen (FS) ([F-00367](#)) were extended by one year during the PHE under [CLTS Appendix K](#) authority. Extended LOC end dates are distributed across 12 months from June 1, 2023, through May 31, 2024. LOC end dates can be viewed in the DHS Eligibility and Enrollment Streamlining System ([EES](#)).

Beginning June 1, 2023, CWAs must resume CLTS FSs for annual functional eligibility redeterminations. CWAs are responsible for completing each participant's redetermination during the month of the participant's LOC end date in [EES](#), so that a redetermination is done for all participants during the year after the PHE ends and the redeterminations are distributed over a 12-month period. CWAs must complete redeterminations in accordance with all requirements in the CLTS Waiver Program Manual ([P-02256](#)) and CLTS FS Clinical Instructions ([P-00936](#)). Before June 2023, CWAs may take steps to prepare for CLTS FSs that will occur in June 2023, which may include but are not limited to scheduling appointments and gathering information needed to complete CLTS FSs.

Only one FS is completed per participant every 12 months. For children enrolled in the CLTS Waiver Program and another program that uses the FS to determine functional eligibility, the FS is completed on the earliest date required by either program. CWAs should use information in the Functional Screen Information Access ([FSIA](#)) system to transfer FS "ownership" when necessary.

In addition to resuming FSs for annual eligibility redeterminations, CWAs must also confirm participants are enrolled in a full-benefit Medicaid (MA) healthcare program in order to remain eligible for the CLTS Waiver Program. CWAs should use [EES](#) predictive disenrollment reports to identify last dates of MA healthcare program eligibility. Predictive disenrollment reports list participants' last date of MA healthcare program eligibility in the current month and the next month. CWAs must help participants enroll in Home and Community-Based Waiver MA when eligibility for another MA healthcare program is lost. (Refer to the CLTS Waiver Program Manual ([P-02256](#)) § 2.5.)

CLTS Functional Screen documentation for initial screens

Secondary sources of documentation to verify a mental health diagnosis for initial CLTS FSs were allowed during the PHE under existing [CLTS § 1915\(c\) waiver](#) authority. Effective immediately, as permanent policy, secondary sources may be used to confirm a mental health diagnosis for an initial CLTS FS when all the following requirements are met:

- The diagnosis was made by a medical professional (a physician, licensed psychologist, psychiatrist, licensed clinical social worker, licensed professional counselor, or licensed marriage and family therapist) for whom diagnosing that particular mental health disorder is within the scope of their training and practice.
- The mental health diagnosis was made using standardized testing and norm referenced tools (usually the Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5) criteria for Mental Health diagnoses).
- The participant or their legal representative and support and service coordinator believe the diagnosis to be current.

Continuous enrollment

All participants remained continuously enrolled in CLTS Programs during the PHE with certain exceptions, under [CLTS Appendix K](#) authority and the [Families First Coronavirus Response Act](#) § 6008.

The continuous enrollment flexibility ends on March 31, 2023. CWAs must resolve disenrollments that were delayed during the PHE for participants with the following circumstances (“delayed disenrollment groups”) within the timeframes noted below for each group. In April and May 2023 CWAs may take steps to prepare for required activities to unwind delayed disenrollments.

- The participant has been in an ineligible living arrangement for more than 90 days and is currently in an ineligible living arrangement. CWAs will resolve these disenrollments from June 1, 2023, through July 31, 2023.
- The CWA has lost contact with the participant or the participant has not responded to CWA requests for information. CWAs will resolve these disenrollments from June 1, 2023, through July 31, 2023.
- The participant exceeds maximum program age limits.
 - 18 years of age when eligible to transition to an adult long-term care program, with limited exceptions. (Refer to CLTS Waiver Program Manual ([P-02256](#)) § 10.1). CWAs will resolve these disenrollments beginning November 11, 2023.
 - 22 years of age when ineligible to transition to an adult long-term care program. CWAs will resolve these disenrollments from June 1, 2023, through July 31, 2023.

CWAs must contact participants in delayed disenrollment groups before the end of the PHE (May 11, 2023) to notify them that the continuous enrollment flexibility is ending, gather information about any changes to their circumstances, and outline next steps. CWA contacts must provide the participant, at minimum, the following information and be documented in a case note:

- The participant’s circumstances during the PHE that would typically, under permanent policy, not meet eligibility criteria and require disenrollment.
- The participant remained enrolled during the PHE under the continuous enrollment flexibility to enable their access to CLTS Programs supports and services during the PHE.
 - Federal authority for continuous enrollment during the PHE ([Families First Coronavirus Response Act](#) § 6008 and the [CLTS Appendix K](#)).

CWAs must take the following actions for each delayed disenrollment group after confirming a participant does not meet all eligibility requirements:

- **Participants in an ineligible living arrangement for more than 90 days and currently in an ineligible living arrangement:**
CWAs are responsible for disenrolling participants no earlier than June 1, 2023, and no later than July 31, 2023, in accordance with all requirements in the CLTS Waiver Program Manual ([P-02256](#)), including issuing notice of adverse action and participant rights.
- **Participants for whom the CWA does not have accurate contact information or participants have not responded to CWA requests for information needed to establish or maintain eligibility:**
CWAs are responsible for making a minimum of three attempts to reach the participant by all means available, using at least two different modes of communications, such as phone call and email or phone call and text. Each attempt must be documented in case notes, along with any attempts made by the participant to contact the CWA (including voice mail).

If the CWA is unable to gather information from the participant that is needed to verify program eligibility after a minimum of three contact attempts, CWAs must disenroll participants no earlier than June 1, 2023, and no later than July 31, 2023, in accordance with all requirements in the CLTS Waiver Program Manual ([P-02256](#)), including issuing notice of adverse action and participant rights.

- **Participants who exceed maximum age limits:**
 - For participants 22 years of age or older who are ineligible to transition to an adult long-term care program, CWAs are responsible for implementing requirements in the CLTS Waiver Program Manual ([P-02256](#)) § 10.1 outlined in the “Transition to other community supports and services for participants 18-21 years of age ineligible for Adult Long-Term Care Program” section. CWAs will resolve disenrollments for these participants no earlier than June 1, 2023, and no later than July 31, 2023, in accordance with all requirements in the CLTS Waiver Program Manual ([P-02256](#)), including issuing notice of adverse action and participant rights.
 - For participants who are 18-21 years old, CWAs are responsible for implementing requirements in the CLTS Waiver Program Manual ([P-02256](#)) § 10.1 outlined in the “Transition action steps to begin at age 17 years 6 months,” “Transition to an Adult Long-Term Care Program for eligible participants at 18 years of age,” and “Transition to other community supports and services for participants 18-21 years of age ineligible for Adult Long-Term Care Program” sections, as applicable. Participants with these circumstances may voluntarily end their enrollment before November 11, 2023. Beginning November 11, 2023, CWAs are responsible for disenrolling participants in accordance with all requirements in the CLTS Waiver Program Manual ([P-02256](#)), including issuing notice of adverse action and participant rights. CWAs are not to involuntarily disenroll participants who are 18-21 years old before November 11, 2023.

For children and youth who remained on the CLTS Waiver Program waitlist during the PHE under the continuous enrollment flexibility, CWAs must follow the process for resolving delayed disenrollments outlined above and, when appropriate, remove them from the waitlist (end their record in the DHS Program Participation System ([PPS](#)) online system) no earlier than June 1, 2023, and no later than July 31, 2023.

For participants who were in an ineligible setting during the PHE and have returned to an eligible setting, CWAs must complete all activities in the CLTS Waiver Program Manual ([P-02256](#)) § 6.3 for ending temporary suspension of enrollment.

Although due dates (LOC end dates) for CLTS Programs annual functional eligibility redeterminations done via the CLTS FS ([F-00367](#)) were extended by one year during the PHE, in some cases a FS may have been completed for a participant when it was required by a different program. If a FS completed for a participant during the PHE resulted in a not functionally eligible (NFE) determination, the participant remains enrolled in CLTS Programs and the CWA will complete another CLTS FS after the end of the PHE, in accordance with the LOC end date in [EES](#). These CLTS FSs will be completed throughout the year following the end of the PHE, from June 1, 2023, through May 31, 2024. If the CLTS FS done after the end of the PHE results in an NFE determination, the CWA must follow requirements in the CLTS Waiver Program Manual ([P-02256](#)) § 2.4.3 to confirm an NFE finding prior to disenrollment. CWAs must disenroll participants with confirmed NFE findings per requirements in the CLTS Waiver Program Manual ([P-02256](#)). If the CLTS FS done after the end of the PHE results in an eligible finding, the CWA completes other annual redetermination activities and the participant remains enrolled.

II. Support and service coordination

Transitioning flexibility for method to complete support and service coordination contacts

All required support and service coordination (SSC) contacts with participants were allowed to be done either in-person or remotely during the PHE under [CLTS Appendix K](#) authority.

The suspension of required in-person SSC contacts flexibility ends on May 31, 2023. Beginning June 1, 2023, CWAs must resume in-person contacts in accordance with all requirements in the CLTS Waiver Program Manual ([P-02256](#)).

Paraprofessional support and service coordinators flexibility transition

Support and service coordination was allowed to be delivered by paraprofessional SSCs during the PHE under [CLTS Appendix K](#) authority. Paraprofessional SSCs were required to have any combination of four years of post-secondary education and/or work experience working directly with children and families who have long-term support needs. Paraprofessional SSCs were not required to complete the [CLTS Waiver Program Support and Service Coordinator Training: CLTS Waiver Basics](#) and the [Mandated Reporter Online Training](#) prior to being authorized as a qualified SSC provider.

The allowance of paraprofessional SSC flexibility ends on November 10, 2023. Beginning November 11, 2023, SSCs must meet all support and service coordination provider requirements in the CLTS Waiver Program Manual ([P-02256](#)). Paraprofessional SSCs must complete the [CLTS Waiver Program Support and Service Coordinator Training: CLTS Waiver Basics](#) and the [Mandated Reporter Online Training](#) before November 11, 2023, to meet criteria as an SSC under permanent policy.

III. Services

Services to be delivered in person

CLTS Programs services that may be delivered remotely were expanded during the PHE under [CLTS Appendix K](#) and existing [CLTS § 1915\(c\) waiver](#) authorities. This flexibility allowed services to be

delivered remotely when remote delivery was functionally equivalent to in-person delivery. Expanded options for remote service delivery became permanent policy (CLTS Waiver Program Manual ([P-02256](#)) § 4.3.2) during the PHE, with the exceptions of counseling and therapeutic services (federal procedure code T2036), respite (federal procedure code T2036), and personal supports (federal procedure code S9976).

The remote service delivery flexibility ends on May 31, 2023. Beginning June 1, 2023, remote service provision must be done in accordance with requirements in the CLTS Waiver Program Manual ([P-02256](#)).

Conversion of coverage of personal protective equipment

Personal protective equipment (PPE) could be considered for coverage through the specialized medical and therapeutic supplies service during the PHE under existing [CLTS § 1915\(c\) waiver](#) authority. In addition, this flexibility required a CWA case note referencing the COVID-19 PHE and the need for PPE to help the participant access necessary services, and waived the following specialized medical and therapeutic supplies service documentation requirements for authorizing coverage of PPE:

- An order or prescription from the child's physician.
- A written recommendation from a medical or therapy professional.
- A case note for a verbal contact between the SSC and the medical or therapy professional verifying recommendation of the item or supply.

The coverage of PPE flexibility ends on May 31, 2023; however, the coverage of PPE will continue to be allowed under permanent policy to help participants access PPE needed to address their identified outcomes. Beginning June 1, 2023, PPE may be considered for authorization through the participant and family directed goods and services or specialized medical and therapeutic supplies services in accordance with requirements in the CLTS Waiver Program Manual ([P-02256](#)).

Transition from paying parents to deliver CLTS Waiver Program services to their child during the PHE

The CLTS Waiver Program was able to authorize parents as paid providers of some services to their child during the PHE under [CLTS Appendix K](#) authority when certain criteria are all met. This flexibility applied only to the CLTS Waiver Program and not to CCOP.

The flexibility to pay parents to deliver CLTS Waiver Program services to their child under [CLTS Appendix K](#) ends on November 10, 2023. Beginning November 11, 2023, a participant's parent may not be authorized to deliver CLTS Waiver Program caregiver services to their child, and all supports and services must be authorized in accordance with requirements in the CLTS Waiver Program Manual ([P-02256](#)). A denial of a request for a parent to be paid to deliver services to their child is not subject to notice of adverse action and appeal rights on or after November 11, 2023, when the [CLTS Appendix K](#) authority has ended as this is an automatic change adversely affecting some or all recipients ([42 CFR § 431.220\(b\)](#)).

CWAs are responsible for identifying existing authorizations to pay a parent to deliver CLTS Waiver Program services to their child and training SSCs on the necessary steps to transfer authorizations to providers qualified under permanent policy.

IV. Signatures

Alternate options for obtaining “wet” signatures (participant or their legal representative signing their name on paper) for required CLTS Programs forms were allowed during the PHE under [CLTS Appendix K](#) authority.

The signature flexibility ends on May 31, 2023. Beginning June 1, 2023, CWAs must obtain required participant signatures in accordance with requirements in the CLTS Waiver Program Manual ([P-02256](#)).

V. Participant and staff COVID-19 infections

CWAs were required to submit an incident report via the [Children’s Incident Tracking and Reporting \(CITR\) system](#) when a participant or person that lived with the participant tested positive for COVID-19 during the PHE, under existing [CLTS § 1915\(c\) waiver](#) authority. In addition, CWAs were required to notify their [CLTS children and family program specialist](#) when a CWA staff person tested positive for COVID-19 during the PHE, and outline their plan to mitigate the spread of infection to other staff and participants. If the staff person who tested positive for COVID-19 had contact with a participant, CWAs were required to submit an incident report via the [CITR system](#).

The participant and staff COVID-19 infections flexibility ends on May 31, 2023. Beginning June 1, 2023, CWAs no longer:

- Complete incident reports for participants or people that live with participants who test positive for COVID-19.
- Submit incident reports for participants who have been in contact with a CWA staff person who has tested positive for COVID-19.
- Notify their CLTS children and family program specialist when a CWA staff person tests positive for COVID-19.

VI. Parental payment limit (PPL)

CWAs were required to reassess all participants’ parental payment limit (PPL) during the PHE and determine any adjustments due to financial hardship, under existing state authority([Wis. Admin. Code ch. DHS 1.065\(3m\)\(c\)](#)) authority. If the participant and their family were experiencing financial hardship due to the PHE, the PPL was waived. Hardship was defined as a change in eligible household income due to the PHE. In addition, if a participant’s supports and services had been reduced due to the PHE, CWAs were required to recalculate PPL using the cost of actual incurred supports and services.

The parental payment limit flexibility ends on November 10, 2023. Beginning November 11, 2023, CWAs must determine and implement activities related to PPL in accordance with requirements in the CLTS Waiver Program Manual ([P-02256](#)).

Notice of adverse action and participant rights for COVID-19 unwinding

Requirements for issuing notice of adverse action (NOA) and participant rights ([F-20985](#)) for PHE unwinding actions are based on a flexibility’s authority and the impact to participants due to unwinding requirements. Flexibilities with federal authority under the [CLTS Appendix K](#) and [Families First Coronavirus Response Act](#) § 6008 are subject to [42 CFR § 431.220\(b\)](#) which states:

The agency need not grant a hearing if the sole issue is a Federal or State law requiring an automatic change adversely affecting some or all recipients.

End dates of [CLTS Appendix K](#) (no later than six months after the expiration of the national public health emergency) and [Families First Coronavirus Response Act](#) § 6008 (March 31, 2023) constitute changes to federal regulations requiring an automatic change adversely affecting some or all recipients. Therefore, not all flexibilities with these authorities are subject to NOA and participant appeal rights.

[42 CFR § 431.220\(b\)](#) does not apply to unwinding actions for flexibilities with existing federal authority ([CLTS § 1915\(c\) waiver](#)) or existing state authority ([Wis. Admin. Code ch. DHS 1.065\(3m\)\(c\)](#)) authority because there are no automatic changes to these authorities when the PHE ends.

When unwinding actions are subject to issuing NOA and participant appeal rights, CWAs must complete this action in accordance with requirements in the CLTS Waiver Program Manual ([P-02256](#)) § 8. Refer to the summary table below for unwinding actions that are subject to issuing NOA and participant appeal rights.

Summary table

The following table summarizes main points about flexibilities for the COVID-19 PHE and required county waiver agency (CWA) actions for unwinding. This table functions only as a resource tool; refer to previous sections of the memo for comprehensive information about the flexibilities and unwinding.

Flexibility	Flexibility End Date	Unwinding Requirements for CWAs	Does the Flexibility Become Permanent Policy?	Is Ending the Flexibility Subject to NOA and Appeal Rights?
Extend level of care end date / reevaluations for up to one year past the due date	5/31/23	<ul style="list-style-type: none"> • On 6/01/23, resume completing CLTS FSs for annual functional eligibility redeterminations. <ul style="list-style-type: none"> ◦ Before 6/01/23, prepare for CLTS FSs that will occur in June 2023. • Redeterminations for all participants will take place from 6/01/23-5/31/24. • Complete each participant’s redetermination during the month of the participant’s level of care (LOC) end date in the DHS Eligibility and Enrollment Streamlining System (EES). • Ensure only one CLTS FS is completed per participant every 12 months. • Confirm participants are enrolled in a full-benefit Medicaid (MA) 	No	No

Flexibility	Flexibility End Date	Unwinding Requirements for CWAs	Does the Flexibility Become Permanent Policy?	Is Ending the Flexibility Subject to NOA and Appeal Rights?
		<p>healthcare program in order to remain eligible for the CLTS Waiver Program.</p> <ul style="list-style-type: none"> ○ Use EES predictive disenrollment reports to identify last dates of MA healthcare program eligibility. ○ Help participants enroll in Home and Community-Based Waiver MA when eligibility for another MA healthcare program is lost. 		
CLTS Functional Screen documentation for initial screens	5/31/23	<p>Effective immediately, as permanent policy, use secondary sources as applicable to confirm a mental health diagnosis for an initial CLTS FS when all of the following requirements are met:</p> <ul style="list-style-type: none"> ○ The diagnosis was made by a medical professional (a physician, licensed psychologist, psychiatrist, licensed clinical social worker, licensed professional counselor, or licensed marriage and family therapist) for whom diagnosing that particular mental health disorder is within the scope of their training and practice. ○ The mental health diagnosis was made using standardized testing and norm referenced tools (usually the Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5) criteria for Mental Health diagnoses). ○ The participant or their legal representative and support and 	Yes	No

Flexibility	Flexibility End Date	Unwinding Requirements for CWAs	Does the Flexibility Become Permanent Policy?	Is Ending the Flexibility Subject to NOA and Appeal Rights?
		service coordinator believe the diagnosis to be current.		
Continuous enrollment / Suspend involuntary disenrollments: living arrangement is an ineligible setting	3/31/23	<ul style="list-style-type: none"> • Contact participants before 5/11/23 to notify them that the continuous enrollment flexibility is ending, gather information about any changes to their circumstances, and outline next steps. • If participant has returned to an eligible setting, complete all activities in the CLTS Waiver Program Manual (P-02256) § 6.3 for ending temporary suspension of enrollment. • For participants in an ineligible living arrangement for more than 90 days and currently in an ineligible living arrangement, complete disenrollment no earlier than 6/01/23 and no later than 7/31/23. 	No	Yes
Continuous enrollment / Suspend involuntary disenrollments: inaccurate participant contact information or no response from participant	3/31/23	<ul style="list-style-type: none"> • Contact participants before 5/11/23 to notify them that the continuous enrollment flexibility is ending, gather information about any changes to their circumstances, and outline next steps. • If the participant or their legal representative does not respond to CWA requests for information, complete disenrollment no earlier than 6/01/23 and no later than 7/31/23. 	No	Yes
Continuous enrollment: participant exceeds	3/31/23	<ul style="list-style-type: none"> • Contact participants before 5/11/23 to notify them that the continuous enrollment flexibility is ending, gather information 	No	Yes

Flexibility	Flexibility End Date	Unwinding Requirements for CWAs	Does the Flexibility Become Permanent Policy?	Is Ending the Flexibility Subject to NOA and Appeal Rights?
maximum age limit		<p>about any changes to their circumstances, and outline next steps.</p> <ul style="list-style-type: none"> • For participants 22 years of age or older who are ineligible to transition to an adult long-term care program, complete all requirements in the CLTS Waiver Program Manual (P-02256) § 10.1 outlined in the “Transition to other community supports and services for participants 18-21 years of age ineligible for Adult Long-Term Care Program” section. <ul style="list-style-type: none"> ○ Complete disenrollment no earlier than 6/01/23 and no later than 7/31/23. • For participants who are 18-21 years old, complete all requirements in the CLTS Waiver Program Manual (P-02256) § 10.1 outlined in the “Transition action steps to begin at age 17 years 6 months,” “Transition to an Adult Long-Term Care Program for eligible participants at 18 years of age,” and “Transition to other community supports and services for participants 18-21 years of age ineligible for Adult Long-Term Care Program” sections, as applicable. <ul style="list-style-type: none"> ○ CWAs must not involuntarily disenroll participants who are 18-21 years old before 11/11/23. ○ Resolve involuntary disenrollments beginning 11/11/23. 		

Flexibility	Flexibility End Date	Unwinding Requirements for CWAs	Does the Flexibility Become Permanent Policy?	Is Ending the Flexibility Subject to NOA and Appeal Rights?
Continuous enrollment / Suspend involuntary disenrollments: found not functionally eligible (NFE) from 3/01/20 through 5/31/23 and at first functional eligibility redetermination on or after 6/01/23	5/31/23	<ul style="list-style-type: none"> • Complete a CLTS FS for the participant between 6/01/23 and 5/31/24, in the month of the participant's LOC end date in EES. • If the CLTS FS done on or after 6/01/23 results in a NFE determination, follow requirements in the CLTS Waiver Program Manual (P-02256) § 2.4.3 to confirm the NFE finding prior to disenrollment. • Disenroll participants with a confirmed NFE finding. 	No	Yes
Suspend in-person support and service coordination visits	5/31/23	Beginning 6/01/23, resume in-person support and service coordination contacts in accordance with all requirements in the CLTS Waiver Program Manual (P-02256).	No	No
Paraprofessional support and service coordination	11/10/23	Beginning 11/11/23, SSCs must meet all Support and Service Coordination provider requirements in the CLTS Waiver Program Manual (P-02256), including completion of the CLTS Waiver Program Support and Service Coordinator Training: CLTS Waiver Basics and the Mandated Reporter Online Training .	No	No
Remote service delivery	5/31/23	Beginning 6/01/23, remote service delivery must be done in accordance with requirements in the CLTS Waiver Program Manual (P-02256).	Yes	No
Purchasing personal protective	5/31/23	Beginning 6/01/23, PPE may be considered for authorization through the Participant and Family Directed Goods and Services or Specialized	Yes	No

Flexibility	Flexibility End Date	Unwinding Requirements for CWAs	Does the Flexibility Become Permanent Policy?	Is Ending the Flexibility Subject to NOA and Appeal Rights?
equipment (PPE) for participants		Medical and Therapeutic Supplies services in accordance with requirements in the CLTS Waiver Program Manual (P-02256).		
Paid provision of services from a participant's parent	11/10/23	<ul style="list-style-type: none"> • Identify existing authorizations to pay a parent to deliver CLTS Waiver Program services to their child. • Train support and service coordinators on the necessary steps to transfer authorizations to providers qualified under permanent policy. • On or before 11/10/23, end authorizations to pay a parent to deliver CLTS Waiver Program caregiver services to their child. 	No	<ul style="list-style-type: none"> • Subject to NOA/rights as required in CLTS COVID-19 Q&As (through 11/10/23). • Not subject to NOA/rights after Appendix K ends (11/11/23 and after).
Signatures	5/31/23	Beginning 6/01/23, obtain required participant signatures in accordance with requirements in the CLTS Waiver Program Manual (P-02256).	No	No
Reporting COVID positive cases for participants, families, and CWA staff	5/31/23	Beginning 6/01/23, CWAs no longer: <ul style="list-style-type: none"> • Complete incident reports for participants or people that live with participants who test positive for COVID-19. • Submit incident reports for participants who have been in-contact with a CWA staff person who has tested positive for COVID-19. • Notify their CLTS children and family program specialist when a CWA staff tests positive for COVID-19. 	No	No

Flexibility	Flexibility End Date	Unwinding Requirements for CWAs	Does the Flexibility Become Permanent Policy?	Is Ending the Flexibility Subject to NOA and Appeal Rights?
Parental payment limit (PPL)	11/10/23	Beginning 11/11/23, CWAs must determine and implement activities related to PPL in accordance with requirements in the CLTS Waiver Program Manual (P-02256).	No	No

Assistance

County waiver agencies should direct operational questions about COVID-19 Unwinding to their [CLTS children and family program specialist](#).