# CLTS Program: Enrollment Timeliness Compliance Project



Bureau of Children's Services
Division of Medicaid Services
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# Background

- Enrollment timelines ensure a participant has timely access to Children's Long-Term Support (CLTS) Program regardless of where in the state a participant lives.
- Per the State and County Contract, counties must:
  - Meet conditions and requirements in the CLTS waiver and CLTS manual.
  - Have the capacity to ensure CLTS participants have timely access to support and service coordination.

# Enrollment Timeliness Policy

- Within 45 calendar days from the referral date, the county waiver agency (CWA) is responsible for completing an eligibility determination for the participant.
- Within 45 calendar days that a participant who wishes to enroll in the CLTS Program becomes enrollable, the CWA is responsible for enrolling them and beginning service planning.

#### Issue

- Many CWAs are compliant with enrollment timelines. However, there are CWAs whose performance consistently falls below policy standards.
   Currently 20 counties are not compliant.
- The Wisconsin Department of Health Services (DHS) is initiating enhanced actions to improve timely enrollment into CLTS across the state.

#### Memo 2024-02

- Memo 2024-02, DHS Actions to Address County Waiver Agency (CWA) Failure to Meet CLTS Program Enrollment Timeliness Requirements, was released August 8, 2024.
- The purpose of this memo is to outline the steps DHS will take to address CWAs that fail to meet the CLTS Program's enrollment timeliness requirements for eligible participants.

#### Escalation Plan

Withholding of CWA Requirement administrative to repay allocation Corrective funds action plan

### Corrective Action Plan (CAP)

- Triggered when the average wait time for new enrollees is more than 100 days.
- Non-compliant status persists for more than 60 days.

#### CAP Process

- DHS will issue CAP letters to non-compliant CWAs.
- CWAs will be required to identify their corrective action steps and submit their plan to DHS for addressing the enrollment delays.

#### CAP Timeline

- The CWA is required to provide a written response with their action steps, timelines, and benchmarks within 30 calendar days.
- DHS staff review the CAP and issue a decision on whether the CAP is acceptable within 30 calendar days of receipt.
- The CAP deadline is negotiated between the CWA and DHS.

#### Current Data

- If CAPs were imposed today, 20 counties would be noncompliant with enrollment timeliness.
  - 11 counties have wait times between 100 and 200 days.
  - o 6 counties have wait times between 200 and 300 days.
  - 3 counties have wait times over 300 days.
- Wait times by CWA can be viewed on the <u>enrollment</u> <u>dashboard</u>.

## Consequences

- DHS is committed to supporting CWAs to achieve compliance with timeline enrollment standards.
- Failure to comply with the CAP requirements or make agreed upon progress can result in repayment of funds and risk of withholding of a CWA administrative allocation.

# Next Step: Implementation

- DHS will send 10-day CAP notice letters and initiate subsequent escalating actions to non-compliant CWAs beginning in January 2025.
- DHS expects these efforts to improve and eventually resolve lags in timely enrollment for eligible CLTS participants.

### Questions?