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**Date:** December 14, 2015

**To:** County Department of Human Service Directors  
County Department of Social Services Directors  
County Department of Community Program Directors  
Long-Term Support Supervisors and Leads

**From:** Deborah Rathermel, Interim Director  
Bureau of Children's Services

**Subject:** January 2016 Children's Community Options Program Information

### **Background**

Effective January 1, 2016, the Family Support Program funding is merging with the portion of Community Options Program allocated to children to form the Children's Community Options Program (COP). The statutory authority and program requirements for Children's COP are established in 2015 Act 55 § 46.272.

The Bureau of Children's Services (BCS) has been working in collaboration with a stakeholder group over the past several months to identify the operational and systems changes that will need to occur in conjunction with this merger. The purpose of this communication is to highlight the key differences that will begin in January 2016, including instructions, timelines, and further transitional tasks.

### **Overview**

In keeping with the intent of this initiative, which was to simplify oversight of multiple program requirements and eliminate administrative redundancies, while increasing the flexibility for county agencies' use of this General Purpose Revenue (GPR), we have strived to make the merger as seamless as possible. The information below should assist your agency in operationalizing the necessary updates.

### **Eligibility**

If a child is eligible for either the Family Support Program (FSP) or Community Options Program, they are eligible for Children's COP. The Children's Long-Term Support Functional Screen (CLTS FS) establishes eligibility for BCS long-term support programs. The screen currently does not list the Children's Community Options Program. We expect to update the

CLTS FS during 2016, but in the meantime, when seeking to establish eligibility for Children's COP, either FSP or COP eligibility is adequate for determining Children's COP eligibility.

### **Advisory Committee**

Each county agency is to have an advisory committee to assist in the development of the program plan and to monitor the program. County agencies may establish an advisory committee or appoint an existing committee as the children's community options advisory committee. Whether using a new or established committee, the composition of the committee membership must include the members outlined in 2015 Act 55 § 46.272(4) (a) (1-3).

In 2016, no county agencies will be required to continue a Family Support committee and only counties with 2016 adult COP allocations will need to continue operating a COP committee. Counties may choose to repurpose members of either of these committees or create new advisory committees for Children's COP.

County agencies should determine their Children's COP advisory committee composition in the first quarter of 2016, with plans to have the initial advisory meeting in the second quarter of 2016.

### **Annual Program Plan**

The requirements for the Children's COP program plan are outlined in section 46.272(4) (b) of the statute. The program plan is to be developed in cooperation with the advisory committee.

County agencies will need to develop their Children's COP program plan in 2016 with the advisory committee. The Department will extend each county's existing Family Support Plan until the newly developed Children's COP program plan is prepared in 2016, which shall be no later than September 30, 2016.

To effectuate the extension of your 2015 Family Support Program Plan into 2016 to serve as the Children's COP Program Plan during this program transition, please submit an email to [alyssa.zirk@wisconsin.gov](mailto:alyssa.zirk@wisconsin.gov) by January 15, 2016, with the subject line "2016 Children's COP Plan- (County Name)", requesting an extension of your 2015 Family Support Plan, and include the identified lead agency within the county that will administer the program and a contact person within that agency.

### **Children's Community Options Program Services**

The Children's COP statutes identify a few costs that cannot be paid with the Children's COP funding. This includes no use of funds for room and board, § 46.272(10)(a) (2), and the funds may not be used to purchase land or construct buildings, § 46.272 (13)(b)(4).

The child must also be eligible, as established by a current CLTS FS, and reside in an eligible setting; specific limits are noted in the statute for any child in a nursing home or seeking funding while residing in a residential setting of more than five beds.

Beyond these stated limitations in the statute, the 2016 county Children's COP allocations may be used to fund supports and services that have been allowable under the Family Support Program.

### **Administrative Rate**

County agencies can claim a 7 percent Children's COP administrative rate. A variance of up to 10 percent can be granted in instances where it is justified.

### **Service Coordination**

Similar to the Community Options Program and CLTS Waiver Program, service and support coordination is an allowable service cost in Children's COP. This change allows county agencies to bill for the cost of service coordination as a service expenditure and will not be an allowable administrative cost.

The Department of Health Services is developing a Children's COP Guide based on the existing Family Support Program Guide, which will include additional specificity related to service coordination. As denoted in § 46.272(10) (b) 1-3; *Services; Care Management Requirements*, the service coordination standards will be phased in based on a reasonable schedule after department consultation with specific representatives.

Until the finalization of these standards, county agencies may claim incurred service coordination costs for eligible Children's COP beginning January 2016. The allowable service coordination rate will be your approved 2016 CLTS Waiver service coordination rate.

### **Current Individual Service Plans (ISP)**

Counties will not be required to create new ISPs for children who were receiving services funded under FSP or COP in 2015 that will be paid with the merged allocation in 2016. Notwithstanding the service cost restrictions noted above, supports and services allowable in 2015 will not be disallowed in 2016 under the combined funding.

When the children's ISP is updated in 2016, we do ask that the county change the authorization to reflect the Children's COP.

### **Reporting and Coding Instructions**

County agencies using Children's COP funding as a local funding match for CLTS Waivers will use funding source "CC" on the corresponding authorizations and claims submitted to the CLTS Third Party Administrator (TPA). To prevent undue administrative burden, existing calendar

Year (CY) 2016 authorizations that use the previous local match funding sources for Family Support, "FS," and [original] COP, "CP" will not need to be immediately changed; however, the TPA will cease to treat FS and CP codes as valid funding sources beginning in CY2017. Accordingly, county agencies will be expected to use the funding source code "CC" on any new Children's COP authorizations and to update any existing 2016 FS and CP authorizations to CC for use of Children's COP as CLTS match at their earliest convenience.

County agencies reporting Children's COP expenses that are NOT waiver match (100% general purpose revenue (GPR)) will use the Long Term Support (LTS) module within the Human Services Reporting System (HSRS). The county agencies will use the LTS code 7 (field 26) with a fund source code of "cc" (field 27).

Effective January 1, 2016, for CY2016 expenses, county agencies will no longer use the Family Support module to report expenses for services to children when the funds are used as straight GPR. (Reporting requirement for CY2015 expenses for children has not changed.)

HSRS code changes may not be in place until the first quarter of CY2016. County agencies should hold CY2016 expense reporting until the system changes for the Children's COP are in place. When these HSRS changes are implemented, county agencies will be expected to report Children's COP expenses on a monthly basis. Further detail will be shared when the module is updated.

Please contact the Bureau of Children's Services if you have outstanding questions.

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