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To: IRIS Consultant Agencies (ICAs)  
HCBS Waiver Service Providers

From: Betsy Genz, Director  
Bureau of Programs and Policy

Kiva Graves, Director  
Bureau of Quality and Oversight

Handwritten signatures in blue ink. The first signature is 'Betsy Genz' and the second is 'Kiva Graves'.

Subject: Updated Temporary Guidance for IRIS Remote Waiver Services

The Wisconsin Department of Health Services (DHS) is updating **temporary guidance** for home and community based services (HCBS) waiver services delivered remotely to participants in the Include, Respect, I-Self Direct (IRIS) program. ICAs and providers should follow this guidance, which will be in effect during, **and only during**, the public health emergency (PHE). This memo replaces the guidance issued on May 13, 2020.

**As soon as the PHE has ended, the information in the IRIS program's remote waiver service policy resources will be in effect.**

DHS is actively working to protect and ensure the capacity of the state's long-term care system as it responds to COVID-19. Allowing the option to provide HCBS waiver services remotely during the PHE expands the support options HCBS providers have available to IRIS participants.

For the duration of the PHE for COVID-19, DHS will allow waiver services to be delivered utilizing synchronous technology for all HCBS waiver services that can be delivered with the functional equivalency of the in-person service. Synchronous technology permits two-way, real time, interactive communications between the provider at a distant site and the participant. Functional equivalence exists when there is no reduction in quality, safety, or effectiveness of the service, as compared to the in-person service, because it is delivered by using audiovisual telecommunication technology. The remote service must be provided in an amount and nature sufficient to meet the key components and/or requirements of the same service when rendered via in-person interaction.

HCBS providers must maintain complete and accurate documentation according to existing policy. Additionally, providers must document the type of technology utilized and the reason for remote provision of services for each remote waiver service.

## **Temporary Guidance for Remote Waiver Service Utilization**

Participants interested in remote services should contact their IRIS consultant (IC). The participant and IC will discuss the need and determine if this is a support that will meet the participant's long-term care needs. [The Collaborative Decision Making during COVID-19: A Guide for IRIS Participants](#) may be a helpful resource for this discussion.

If a participant requests technology in order to accomplish remote services, the IC and the participant must first explore the use of technology already available to the participant in the household. If existing technology in the home will not meet the service need, the participant and IC should explore how the participant can access additional technology, including identifying the most cost-effective solution.

If a technology purchase is authorized, the technology purchased must be used to meet a participant's health and safety or long-term care need. The participant will receive a notice of action, including appeal rights if the decision is made to not approve the requested technology.

## **Connecting Via Technology**

HCBS providers may use a variety of electronic platforms to connect with participants they serve, matching their programming with the platform that makes the most sense to meet the person's needs.

HCBS providers may need to alter or add elements when services are delivered using remote technology. Documentation for services delivered through remote technology must include verification of the length of time the participant was logged into the activity, such as time in and time out, as well as the content of the activity or the service delivered.

## **Claims Submission for Remote Waiver Services**

There are no changes to the claims submission process for long-term care providers providing remote HCBS waiver services.

## **Remote Services Reminders and Consent**

Providers may not require the use of remote waiver services as a condition of providing services to a participant. HCBS providers must implement methods of informed consent to confirm that a participant agrees to receive waiver services remotely.