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**State of Wisconsin
Governor Scott Walker**

**TO: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers
Training Staff
Child Care Coordinators**

DHS OPERATIONS MEMO					
No:		DHS 15-04			
DATE:		01/26/2015			
FS	<input type="checkbox"/>	MA	<input checked="" type="checkbox"/>	BC+	<input checked="" type="checkbox"/>
SC	<input type="checkbox"/>	CTS	<input type="checkbox"/>	FSET	<input type="checkbox"/>

FROM: Shawn Smith, Bureau Director
Bureau of Enrollment Policy & Systems
Division of Health Care Access and Accountability

SUBJECT: Addressing Delayed Health Care Account Transfers from the Marketplace

EFFECTIVE DATE: January 26, 2015

PURPOSE:

This memo describes a one-time process the Department of Health Services (DHS) will use to address health care account transfers from the Marketplace that have been delayed because of “inconsistent” information about income.

BACKGROUND:

As described in Operations Memo 13-32 (“BadgerCare Plus Policy and System Changes”), the federal Patient Protection and Affordable Care Act established the Federally Facilitated Marketplace, which offers private health insurance to individuals and families. As of October 1, 2013, individuals have used the Marketplace to shop for and purchase private health insurance, as well as apply for Advance Premium Tax Credits (APTCs) to lower the cost of their private health insurance premiums.

If a Wisconsin resident asks for help with paying for health insurance through the Marketplace but does not qualify for APTCs, the application is then considered to be a request for BadgerCare Plus (BC+). If the Marketplace finds that the applicant meets the criteria for BC+, the Marketplace transfers the application to Wisconsin for processing.

In late 2014, CMS notified DHS that the Marketplace was not able to process applications from approximately 3,200 individuals who applied between October 1, 2013, and January 17, 2014. This was due to “inconsistent” information about income. Because CMS has not been able to resolve these inconsistencies, they have asked DHS to process these account transfers. \

POLICY:

Of the approximately 3,200 individuals whose accounts were transferred to Wisconsin as “inconsistent” Marketplace referrals, around 1,600 already have an eligibility determination for health care for the month in which the Marketplace application was filed, or, in the case of adults with no dependent children under 19 years of age living in the home (childless adults), for April 2014. For these individuals, no further action is needed.

Of the remaining 1,600 individuals:

- Approximately 800 individuals are either not known to CARES or have not had an eligibility determination for health care.
- Approximately 800 individuals have had an eligibility determination for health care, but it is for a month *after* the month in which the Marketplace application was filed (or, in the case of childless adults, after April 2014). In these cases, there is a gap between when the individual’s eligibility for health care was determined and when eligibility would have been determined if the account transfer had been timely.

Because these account transfers are up to 15 months old, DHS is sending letters directly to affected individuals to ask them to contact their agency if they still want their application to be reviewed for eligibility. The target mailing date for these letters is January 27, 2015. To have their application processed, the individual must contact his or her agency within 30 days of receipt of the letter. If the individual does not contact the agency, no further action is needed.

Prior to the end of January, DHS will provide agencies with a list of individuals to whom these letters have been sent. In addition, the account transfers for which action may still be needed will be released to agencies prior to the end of January. Because the filing dates for these account transfers are between October 1, 2013, and January 17, 2014, they will not be visible in CARES Worker Web (CWW) Agency Inbox. However, agencies may use the Inbox search function to find and view these account transfers.

If an individual contacts the agency in response to the letter, the agency should use existing processes to run eligibility, manually certify individuals as appropriate, and issue a manual notice of decision:

- For individuals who are either not known to CARES or have not had an eligibility determination for health care, agencies should search the Inbox for the account transfer to view the PDF and process the account transfer as needed. As a reminder, the application should be processed under “assessment state” rules, based on the filing date on the account transfer. Per current policy, verification of income should be required for the month the application was filed, as well as for changes that have occurred since the filing month.
- For individuals with an eligibility determination for health care in a month *after* the month in which the Marketplace application was filed, agencies should request verification of

income during the “gap” months. Once verification has been provided, agencies should run eligibility for the gap months only.

CARES:

There are no changes to CARES at this time.

CONTACTS:

BEPS CARES Information & Problem Resolution Center

*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, SC – Senior Care, CTS – Caretaker Supplement, FSET – FoodShare Employment and Training.

DHS/DHCAA/BEPS/AA