



Date: June 6, 2019

DMS Operations Memo 19-22

To: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff

Affected Programs:

- | | |
|---|--|
| <input checked="" type="checkbox"/> BadgerCare Plus | <input type="checkbox"/> Caretaker Supplement |
| <input type="checkbox"/> FoodShare | <input type="checkbox"/> FoodShare Employment and Training |
| <input type="checkbox"/> Medicaid | |
| <input type="checkbox"/> SeniorCare | |

From: Debbie Waite, Deputy Bureau Director
Bureau of Enrollment Policy and Systems
Division of Medicaid Services

Additional Changes for Ending BadgerCare Plus Extension Premiums

CROSS REFERENCE

- BadgerCare Plus Eligibility Handbook, [Chapter 9 Verification](#), [Chapter 18 BadgerCare Plus Extensions](#), and [Chapter 19 Premiums](#)
- Operations Memo [18-47](#)

EFFECTIVE DATE

June 22, 2019

PURPOSE

This operations memo announces changes to policy, CARES Worker Web (CWW), and correspondence related to the elimination of premiums for parents and caretakers in a BadgerCare Plus extension that occurred in January 2019.

BACKGROUND

BadgerCare Plus members who are parents or caretakers and the children under their care may be eligible for a BadgerCare Plus extension if the assistance group's income increases above 100% of the federal poverty level (FPL) due to an increase in earned income or spousal support income. Prior to January 1, 2019, some parents and caretakers were required to pay a monthly premium to become or remain eligible for a BadgerCare Plus extension. A member who did not pay required premiums was subject to a restrictive re-enrollment period (RRP). Wisconsin's authority to require these premiums came from a Section 1115 Demonstration Waiver of the Social Security Act, which ended at the end of 2018. As of January 1, 2019, BadgerCare Plus extension members are no longer required to pay premiums and are not subject to an RRP due to nonpayment of premiums.

In late 2018, DHS implemented several systems and correspondence changes to address this policy change. These changes are described in [Operations Memo 18-47](#). Additional changes described in this memo will be made on June 22, 2019, to CWW and Notice of Decision (NOD) letters to address outstanding issues related to this policy change and provide clearer information for workers and members.

POLICY

UNVERIFIED INCOME DECREASES

When a member in a BadgerCare Plus extension reports and verifies an income decrease that results in a countable income amount at or below 100% FPL, the member is removed from the extension and placed in regular BadgerCare Plus. If the extension is unexpired and there are still months left, the extension will continue to run in the background. If the member's income later increases to above 100% FPL, he or she may be eligible under this unexpired extension for any remaining months in the extension.

Currently, if the member does not verify the income decrease to or below 100% FPL, his or her extension ends and the member is not determined eligible for regular BadgerCare Plus.

Beginning with eligibility determinations for August 1, 2019, if the member does not verify an income decrease to or below 100% FPL, he or she will not be determined eligible for regular BadgerCare Plus. However, the member will continue to be eligible for any remaining months in the extension.

Example 1: The Smith family is in a BadgerCare Plus extension from January through December 2020. In July, they report an income decrease that puts their income at an amount below 100% FPL. They do not provide verification of this income decrease. They remain in the extension and do not open for regular BadgerCare Plus.

PREVIOUS BADGERCARE PLUS ELIGIBILITY AS A CHILD

One criterion for BadgerCare Plus extension eligibility is that the parent or caretaker must have been enrolled in BadgerCare Plus with income that was at or below 100% FPL for at least three of the six months prior to the month in which income went above 100% FPL.

Currently, when tracking the prior six months of eligibility, CARES counts only the months that a person was eligible as a parent, caretaker relative, or pregnant woman with income at or below 100% FPL.

Effective June 22, 2019, CARES will also count prior months of BadgerCare Plus eligibility that the parent with income at or below 100% FPL was previously eligible as a child or a child living with non-legally responsible relatives with income at or below 100% FPL.

All other extension eligibility criteria remain the same, including that the person must be eligible for BadgerCare Plus as a parent, caretaker, or pregnant woman in the month that income increased above 100% FPL.

Example 2: Jenny is 18 years old and lives with her child, Kevin. Jenny was enrolled in BadgerCare Plus as a child with income below 100% FPL from January 1 through May 31. She turns 19 in May. CARES determines that she is eligible for BadgerCare Plus as a parent starting June 1. Her income increased above 100% FPL in June, which was reported timely in July. Jenny was enrolled in BadgerCare Plus as either a parent or a child with income at or below 100% FPL for at least three of the previous six months, so she meets these criteria. Jenny is eligible for an extension starting August 1.

CARES

ELIGIBILITY CHANGES

The following changes will be made to BadgerCare Plus eligibility in CWW on June 22, 2019, to support the policy changes described above:

- If a member is in an extension and his or her income drops to or below 100% FPL, verification of income will be required to be eligible for regular BadgerCare Plus as a parent or caretaker relative. Members will remain eligible under the extension if the income decrease to at or below 100% FPL is not verified.
- CARES will consider past BadgerCare Plus eligibility as a child or a child living with non-legally responsible relatives with income at or below 100% FPL when determining if the person met the three of the past six months criterion for extension eligibility.

SWICA CHANGES

Since there is no upper income limit and no verification of income required for BadgerCare Plus extensions, the State Wage Information Collection Agency (SWICA) exchange will no longer create discrepancies in CWW for quarters when a member is eligible for a BadgerCare Plus extension in at least one month of that quarter. These changes will be seen in the July 2019 SWICA process. The July 2019 SWICA run is for the first quarter of 2019, which coincides with the effective date of the income test change (1/1/19) described in [Operations Memo 18-47](#), "Premiums No Longer Required for BadgerCare Plus Extensions."

CORRESPONDENCE


NOTICE OF DECISION

The IM Eligibility Notice of Decision will be enhanced as follows:

- Reporting rules will be enhanced to include new and modified rules for BadgerCare Plus extensions (see details below).
- The names of people eligible under the BadgerCare Plus extensions category in the "Who is Enrolled in Health Care Benefits" section will be rolled up into one line.
- The financial summary section ("How We Counted Your Income") will be changed for a household in an extension as follows:
 - This section will always display when at least one adult eligible for an extension is present, and in an open status.
 - Children will not be displayed in this section.
 - "N/A" will display in the Counted Income Limit row for all eligible adult individuals only eligible under a BadgerCare Plus extension in the MAGM or MAGE assistance group budget since there is no upper income limit for BadgerCare Plus extensions.

Note: Even though MAGE and MAGM are now both BadgerCare Plus extension AGs with no premiums, due to system limitations these budgets will continue to display separately. MAGM will use the counted income for the AG and MAGE will continue to use counted income for the counted adults in the AG.

The Your Reporting Rules section of the Notice of Decision will be updated with new instructions explaining how members should report changes:



Your Reporting Rules

You must report certain changes based on the benefits you are getting. The types of changes you must report are listed below. You must report these changes to the agency listed on page 1 of this letter. You can do this online or by phone, fax, or mail.

- **Online:** Go to access.wi.gov. Log into your ACCESS account, and click Report My Changes. If you do not have an ACCESS account, you can go to access.wi.gov and create one.
- **Phone:** Call your agency. Your agency's phone number is listed on page 1 of this letter.
- **Fax or mail:** Complete a change report form and fax or mail it using the instructions on the form. To get a change report form, call your agency, or go to www.dhs.wisconsin.gov/forwardhealth/change-report.htm.

Figure 1 Reporting Rules Contact Information

Additional instructions will be included based on the specifics of the case. Members may receive one of the following paragraphs shown in Figure 2, Figure 3, and Figure 4 based on their assistance group type and program enrollment.

Based on the benefits you are getting, you must report within 10 days if someone has a new address, a change in where he or she is staying, or moves in or out of your home. Keep in mind that if your benefits change, your reporting rules may also change.

Figure 2 Reporting Rules Members Eligible Under BadgerCare Plus Extension Only (without Other Programs)

Based on the benefits you are getting, you must report within 10 days if someone:

- Has a new address
- Has a change in where he or she is staying
- Moves in or out of your home

If your household's total monthly income (before taxes) goes over \$2,252.00, you must report it by the 10th day of the next month. For example, if your income goes over the limit in June, you must report it by July 10th.

Figure 3 Reporting Rules Members Eligible Under BadgerCare Plus Extension Only with FoodShare Reporting Income with Gross Income Less than or Equal to 130% FPL

Based on the benefits you are getting, you must report within 10 days if someone:

- Has a new address
- Has a change in where he or she is staying
- Moves in or out of your home

Because your total income exceeds 130% FPL for your FoodShare group size and you remain eligible, you do not have to report any changes for your FoodShare benefits until your next review or six month report form.

Figure 4 Reporting Rules Members Eligible Under BadgerCare Plus Extension Only with FoodShare Reporting Income with Gross Income more than 130% FPL

VERIFICATION CHECKLIST

As part of the changes implemented in November 2018, income verification is no longer required for BadgerCare Plus extensions and should not be shown on the Verification Checklist for extension eligibility. After the changes were implemented in 2018, the Verification Checklist continued to request income verification when a case was also pending for verification of nonfinancial information even though CARES did not require income to be verified to determine extension eligibility. Effective June 22, 2019, the Verification Checklist will no longer request income verification for extension eligibility.

ACCESS CHANGES

ACCESS pages will be updated to reflect the changes being made for BadgerCare Plus extensions as follows:

- All modules of ACCESS will be enhanced to remove any references to premiums for BadgerCare Plus extensions.
- The Report My Changes (RMC) module will be enhanced by removing the income-reporting threshold on the RMC landing page when all individuals in the case are open in only BadgerCare Plus extensions and the income-reporting threshold is not relevant. These cases include only the households where the household members are only eligible under a BadgerCare Plus extension or as a pregnant woman, continuously eligible newborn, Former Foster Care Youth, or a combination of these types.

Note: If any other IM programs are open on the case that requires an income reporting threshold, the income reporting threshold message will continue to display.

In addition, households eligible under only Family Planning Only Services (FPOS), reporting requirement “Someone’s dependent care bills (such as day care) changed” will not display.

CONTACTS

BEPS CARES Information and Problem Resolution Center

DHS/DMS/BEPS/RW