



Date: September 22, 2023
Amended November 14, 2023

DMS Operations Memo 23-35

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

Affected Programs:	
<input type="checkbox"/> BadgerCare Plus	<input type="checkbox"/> Caretaker Supplement
<input type="checkbox"/> FoodShare	<input type="checkbox"/> FoodShare Employment and Training
<input checked="" type="checkbox"/> Medicaid	
<input type="checkbox"/> SeniorCare	

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Division of Medicaid Services

Reinstatement of Medicaid Purchase Plan Policies

CROSS REFERENCE

- Process Help, [COVID-19 Information](#)
- Medicaid Handbook, [Section 26.3.3 Work Requirement](#), [Section 26.3.4 Work Requirement Exemption](#), [Section 26.3.5 Health and Employment Counseling Program](#), and [Section 26.5 MAPP Premiums](#)
- Operations Memo, [20-12, “Changes to the Medicaid Purchase Plan”](#)
- [Wisconsin Medicaid Purchase Plan \(MAPP\) Consumer Guide](#)

EFFECTIVE DATE

January 1, 2024, except where noted.

PURPOSE

This memo announces the reinstatement of Medicaid Purchase Plan (MAPP) premiums and other policies that were temporarily suspended during the federal public health emergency (PHE) related to COVID-19.

This memo has been amended to state that the effective date for the reinstatement of MAPP premiums has been delayed. The new reinstatement date is not yet determined.

BACKGROUND

The Secretary of the Department of Health and Human Services declared a federal public health emergency on January 31, 2020, related to COVID-19. Based on related changes in federal and state law, Wisconsin implemented temporary program policies and processes to protect the health and safety of applicants and members during the PHE. These policies included the temporary suspension of MAPP premiums, a delay in the implementation of new policies related to premiums, and temporary suspension of the MAPP work requirement.

On December 29, 2022, Congress passed the Fiscal Year 2023 Consolidated Appropriations Act (CAA, 2023) which ended some temporary policies that have been in place during the PHE. Under this law, states needed to reinstate certain health care policies as of April 1, 2023. However, as a condition of enhanced federal funding, states were not able to implement more restrictive policies or increase premium amounts for a given population from those in effect as of January 1, 2020, until January 1, 2024.

Under the provisions of the CAA, ~~the MAPP premiums and work requirements~~ **policy** will be reinstated for both new applicants and existing members starting January 1, 2024. For members with continuous eligibility who have not yet completed a renewal by December 31, 2023, ~~these policies~~ **this policy** will be effective as of their renewal.

Due to a change in state law under Wisconsin 2017 Act 59, MAPP premium policies were changed in August 2020, as announced in Operations Memo 20-12, "Changes to the Medicaid Purchase Plan." These provisions, which are briefly summarized below, were implemented in 2020 while premiums were suspended but will be in effect when premiums are reinstated ~~starting in January 2024.~~

POLICY

REINSTATEMENT OF MAPP PREMIUMS

Note: the effective date for MAPP premium policies has been delayed. This memo will be updated with effective dates when the new premium reinstatement date has been determined.

~~Effective January 1, 2024, MAPP premium policies will be reinstated.~~

~~For MAPP, new members with an application filing date on or after April 1, 2023, will be subject to premium requirements as of January 1, 2024.~~

~~Example 1: Brian applied for MAPP on May 1, 2023. He is determined eligible for MAPP effective May 1, 2023, and does not have continuous eligibility. Based on his income, he will start owing a premium for MAPP starting in January 2024. Brian's first premium will be due January 10, 2024. If he does not pay this premium, his eligibility will end effective February 1, 2024.~~

~~MAPP members with continuous eligibility who complete a renewal between June 2023 and December 2023 will be subject to premium requirements as of January 1, 2024.~~

~~Example 2: Jane applied for MAPP on January 18, 2022. She was determined continuously eligible for MAPP effective January 1, 2022. Jane's post continuous eligibility renewal is due~~

October 2023. At Jane's renewal she will be a premium payer. Jane's first premium will be due January 10, 2024. If she does not pay this premium, her eligibility will end effective February 1, 2024.

MAPP members with continuous eligibility with a renewal date of January 2024 through May 2024 will not be subject to premium requirements until after their renewal is complete.

Example 3: Jessie applied for MAPP on December 5, 2022. She was determined continuously eligible for MAPP effective December 1, 2022. Jessie's post continuous eligibility renewal is due February 2024. Jessie completes a timely renewal on January 28, 2024, and is subject to a premium starting March 2024. Jessie's first premium will be due on March 10, 2024. If she does not pay this premium, her eligibility will end effective April 1, 2024.

Example 4: John applied for MAPP on August 17, 2021. He was determined continuously eligible for MAPP effective August 1, 2021. John's post continuous eligibility renewal is due March 2024. However, on January 4, 2024, John completes an early renewal after speaking with the agency. He completes his early renewal and is subject to premium policies starting February 2024. If John must pay a MAPP premium, his first payment will be due February 10, 2024. If he had not completed an early renewal, John would not have owed a premium until April 2024.

PREMIUM-RELATED POLICY CHANGES

Due to a change in state law, MAPP premium policies were changed in August 2020, as announced in [Operations Memo 20-12, "Changes to the Medicaid Purchase Plan."](#) Because these changes occurred during the PHE when MAPP premiums were suspended, members who never had to pay a premium in the past may now have to pay a premium, and members who paid a premium before the COVID-19 pandemic may need to pay a different amount **once premiums are reinstated**.

As a reminder, the following premium policy changes were made in 2020:

- MAPP members with gross income above 100% of the federal poverty level (FPL) will be charged premiums.
- MAPP members who owe premiums will have a minimum premium amount of \$25.
- Premium amounts for members with gross income above 100% are based on a new premium calculation methodology. For most members who had premiums before the policy changes, this will result in lower premiums.
- MAPP members can request a temporary premium waiver due to hardship for up to 12 months for a given hardship reason.
- The restrictive re-enrollment period (RRP) for non-payment of a MAPP premium is three months. Members can regain eligibility at any point during an RRP by paying the premium arrears.

ELECTRONIC PREMIUM PAYMENT OPTIONS

Previously, members paid premiums by check or money order, or through electronic funds transfer (EFT) or wage withholding. Members will now be able to pay ongoing premiums using a credit card, debit card, or EFT from a checking or savings account using the [ACCESS](#) website or MyACCESS mobile app. Members will also be able to view their premium information and payment history through [ACCESS](#) and MyACCESS.

Initial premium payments and RRP premium arrears must still be paid by check or money order and are collected by the Income Maintenance consortium or tribal agency.

REINSTATEMENT OF MAPP WORK REQUIREMENT

Effective January 1, 2024, the work requirement policy will be reinstated.

MAPP members can meet the work requirement in one of three ways: through employment, enrollment in the Health and Employment Counseling Program (HEC), or by having a work requirement exemption.

- Employment activities include at least one work activity per month in exchange for compensation, goods, or services.
- HEC enrollment is limited to nine months with a possible three-month extension. Members can only enroll in the program twice in a five-year period.
- Work requirement exemptions can be granted to members who have been enrolled in MAPP for the previous six months and suffer a health-related hardship that prevents them from meeting the work requirement. Members are allowed two non-consecutive waivers within a three-year period.

MAPP applicants who applied on or after April 1, 2023, will need to meet the work requirement no later than January 31, 2024, to maintain MAPP eligibility on or after February 1, 2024. If an applicant requests backdated eligibility, they can be eligible for MAPP without meeting the work requirement for months during which the work requirement was not in effect (December 2023 or prior).

Example 5: Loreta applied for MAPP. Her filing date was May 7, 2023, and she is enrolled in MAPP on May 10, 2023. Loreta has been eligible for MAPP without meeting the work requirement since her enrollment. To be eligible for MAPP for February 2024 and beyond, Loreta must meet the work requirement by January 31, 2024.

Example 6: Jimmy applies for MAPP on February 2, 2024. Jimmy requests a backdate for MAPP eligibility beginning in November 2023. Jimmy can be eligible for MAPP without meeting the work requirement for November and December 2023. To be eligible for MAPP for January 2024 and beyond, Jimmy must meet the work requirement in these months.

MAPP members with continuous eligibility who complete a renewal between June 2023 and December 2023 will need to meet the work requirement no later than January 31, 2024, to maintain eligibility on or after February 1, 2024.

Example 7: Margaret began receiving MAPP in November 2020. Her post-continuous eligibility renewal is due September 2023. Margaret can remain enrolled in MAPP without meeting the work requirement until January 31, 2024. If Margaret does not meet the work requirement by January 31, 2024, she could lose eligibility effective February 1, 2024.

Continuously eligible members with a renewal due January 2024 through May 2024 must meet the work requirement at renewal to maintain eligibility.

Example 8: Stephen began receiving MAPP in October 2022. His post-continuous eligibility renewal is due March 2024. Stephen can remain enrolled in MAPP without meeting the work requirement until his renewal due date. Stephen must complete his renewal and meet the work requirement as of March 31, 2024, to remain eligible for MAPP as of April 1, 2024.

Example 9: Lu applied for MAPP on February 9, 2023. She was determined eligible and has a post-continuous eligibility renewal due May 2024. Lu can remain enrolled in MAPP without meeting the work requirement until her renewal due date. However, Lu submits an early renewal on March 6, 2024. To maintain MAPP eligibility, Lu must meet the MAPP work requirement by March 31, 2024, in order to be eligible as of April 1, 2024.

CONTACTS

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