



Date: December 4, 2023

DMS Operations Memo 23-44

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 checked="" type="checkbox"/> Medicaid | |
| <input type="checkbox"/> SeniorCare | |

From: Jonelle Brom, Bureau Director
Bureau of Eligibility Operations & Training
Division of Medicaid Services

Jori Mundy, Bureau Director
Bureau of Enrollment & Eligibility Policy
Division of Medicaid Services

12-Month Continuous Health Care Coverage for Children

CROSS REFERENCE

- BadgerCare Plus Policy Handbook, [Chapter 1 Introduction to BadgerCare Plus](#)
- Medicaid Eligibility Handbook, [Chapter 1 Introduction to Medicaid](#)

EFFECTIVE DATE

January 1, 2024

PURPOSE

This memo announces updated eligibility policies that will ensure that children receiving certain health care benefits will have 12 months of continuous coverage.

BACKGROUND

Under current policy, children enrolled in BadgerCare Plus or Medicaid may lose their eligibility if their family's situation changes and they no longer meet program rules. For example, a child may lose coverage if their family's income goes over the program's income limit.

On December 29, 2022, the Consolidated Appropriations Act, 2023, was signed into law. This legislation requires that children in certain Medicaid programs and the Children's Health Insurance Program (CHIP) are provided with 12 months of continuous health care coverage, with some limited

exceptions, effective January 1, 2024. Continuous coverage means that the child will not lose coverage during that time period, even if the family's situation changes. This continuous coverage policy is designed to reduce gaps in coverage, increase the efficiency of health care spending, and reduce health care disparities for children in low-income families.

POLICY

CONTINUOUS COVERAGE PERIOD

Effective January 1, 2024, children under age 19 enrolled in certain health care programs will have 12 months of continuous coverage, starting with the month of their benefit application, new certification period at renewal, or when the child otherwise becomes eligible under a qualifying group. This also applies when a new child under 19 is added to a case that already has a child with 12 months of continuous coverage.

Example 1: Jane applies for health care for her and her son Sam on January 17, 2024, with a three month backdate, and they are determined eligible for BadgerCare Plus as of October 1, 2023. Sam will have continuous coverage from January 1 through December 31, 2024. Even if the household has a change in circumstances during the certification period, Jane may lose coverage, but Sam will remain eligible through December 31, 2024.

Children who are already members of an applicable health care program on January 1, 2024, will have a continuous coverage period that extends to their next renewal date.

Example 2: Juan, age 17, was enrolled in BadgerCare Plus in May 2023. He is still enrolled as of January 1, 2024, so he will have continuous coverage from January 1, 2024, to his renewal date of April 30, 2024. Even if the household reports a change and the household's income goes above the program income limit, he will remain eligible through April 30, 2024.

At renewal, a child must meet the program's eligibility requirements in order to get a new 12-month period of continuous coverage.

Example 3: Gino is 16 and has been enrolled in Medicaid since May 2020. Gino's renewal is due in March 2024. Because Gino is enrolled as of January 1, 2024, he also has continuous coverage until his renewal in March 2024. At renewal, Gino's household income is over 306% of the federal poverty level. He no longer meets program rules, so his health care benefits end March 31, 2024. He does not qualify for a new 12-month continuous coverage period.

Note: Backdated months at application and renewal do not count toward the 12-month continuous coverage period. In addition, if a child is not eligible at application and ongoing, and only eligible for one or more backdated months, they do not qualify for a 12-month continuous coverage period.

POPULATIONS

Children under age 19 in the following programs are eligible for 12 months of continuous coverage:

- BadgerCare Plus

- Supplemental Security Income (SSI) Medicaid
- SSI-Related Medicaid
- Special Status Medicaid
- Institutional Medicaid
- Home and Community Based Waiver (HCBW) Medicaid (including Children’s Long-Term Support (CLTS))
- Family Planning Only Services (FPOS)
- Medicaid Purchase Plan (MAPP)
- Foster Care Medicaid
- Wisconsin Well Woman Medicaid (WWWMA)
- Emergency Services Medicaid
- Tuberculosis-Related Medicaid
- Katie Beckett Medicaid
- Medicare Savings Programs

Continuous coverage does not apply to children:

- Enrolled under presumptive eligibility.
- Required to meet a deductible in order to enroll in BadgerCare Plus or Medicaid.

TERMINATION OF COVERAGE

Qualifying children under 19 will only lose health care coverage during their 12-month continuous coverage period for the following reasons:

- The child turns 19.
- The child is no longer a resident of Wisconsin.
- The child passes away.
- The child’s citizenship, identity, or immigration status is not verified within their reasonable opportunity period.
- The child was eligible as a pregnant minor, turns 19, and their postpartum period ends.
- There is a voluntary request for disenrollment from BadgerCare Plus or Medicaid.

Example 4: Allison is 17 and enrolls in BadgerCare Plus on February 1, 2024. On May 12, her household reports moving to Florida. Allison’s BadgerCare Plus ends May 31, 2024.

Example 5: Margaret applies for BadgerCare Plus for her son Ricardo. Ricardo is eligible, but verification of his citizenship is still needed. Ricardo is enrolled in BadgerCare Plus as of February 1, 2024, and is given a reasonable opportunity period to verify his citizenship. Ricardo’s citizenship is not verified by the due date of May 10, 2024, so his BadgerCare Plus ends May 31, 2024.

CONSIDERATIONS FOR SPECIFIC POPULATIONS AND CIRCUMSTANCES

Effective January 1, 2024, the following policies related to 12-month continuous health care coverage will apply.

PREMIUMS

A child can have a new premium obligation at application or renewal, but they cannot have a new premium once their 12-month continuous coverage period starts. Existing premiums for an individual child cannot increase during their 12-month continuous coverage period, but they may be reduced if applicable. If the premium is lowered, that new amount becomes their premium cap for the rest of the 12-month period.

Example 6: Kiley and Korbin are enrolled in BadgerCare Plus as of July 1, 2024. They each owe a \$20 premium, for a total household premium of \$40. Their individual premiums of \$20 cannot increase during their 12-month period. The household has a reduction in income in December 2024, and their premiums lower to \$10 each. Their premiums now cannot go above \$10 for the rest of the 12-month period. If the household has an increase in income at any point in their remaining certification period, their premiums will not increase.

Example 7: Ryan is enrolled in BadgerCare Plus with no premium. Ryan's continuous coverage period ends on October 31, 2024. In July, his family reports an increase in income that would result in a \$20 premium for Ryan. This premium will only take place in the new certification period, starting on November 1, 2024.

Note: While an individual child's premium cannot increase during their 12-month continuous coverage period, there may be instances where the household's total premium amount does increase, like when another child is added to the household and that new child owes a premium.

Example 8: Emily is enrolled in BadgerCare Plus as of June 1, 2024, with a premium of \$20 for a total household premium of \$20. The household reports another child, Kwan, has joined the household and he is added to the case. Kwan has a premium of \$20, which would bring the new household premium to \$40.

EXTENSIONS

If a child's household has an increase in income that qualifies the parents for an earned income or spousal support extension, the child will stay in their current BadgerCare Plus assistance group while their parent(s) go into the extension.

INCARCERATION

If a child becomes incarcerated and their eligibility is suspended, their continuous coverage will run in the background. If they are released from incarceration within the 12-month period, they will qualify for continuous coverage for the rest of the 12-month period.

If a child's only parent or caretaker becomes incarcerated, the child will keep their health care for the rest of the 12-month period. If the child becomes eligible on another case or if they are enrolled in Foster Care Medicaid, they will get a new 12-month period of continuous coverage.

INSTITUTIONALIZED CHILDREN

If a child is discharged from a medical institution or institution for mental disease (IMD), and they are not eligible for another category of full-benefit health care, they will keep their Institutional Medicaid for the rest of their 12-month continuous coverage period.

HCBW MEDICAID

If a child is disenrolled from their waiver services or managed care organization, and they are not eligible for another category of full-benefit health care, they will keep their HCBW Medicaid and can keep getting Medicaid card services for the rest of the 12-month continuous coverage period.

Note: If someone voluntarily disenrolls from HCBW services, it will be treated as a voluntary disenrollment from HCBW Medicaid and continuous coverage under Waivers Medicaid will end.

FOSTER CARE MEDICAID

If a child getting Foster Care Medicaid leaves their out-of-home placement, or their Subsidized Guardianship, or their Adoption Assistance or Court Ordered Kinship Care agreement ends, they will keep their Foster Care Medicaid for the rest of the 12-month period, or three months after their placement or agreement ends, whichever is later.

Example 9: Trey is enrolled in Foster Care Medicaid since February 1, 2024. His placement ends July 28, 2024. Trey will keep his Foster Care Medicaid until January 31, 2025.

Example 10: Sally is enrolled in Foster Care Medicaid since January 1, 2024. Her placement ends November 13, 2024. Sally will keep her Foster Care Medicaid until February 29, 2025, so she has three months to apply for other health care coverage.

EMERGENCY SERVICES

An immigrant child enrolled in Emergency Services qualifies for a 12-month period of continuous coverage. Their enrollment is not limited to the period their provider indicates they require treatment of an emergency medical condition.

TRANSITIONS BETWEEN CHIP AND MEDICAID

During the 12-month continuous coverage period, a child may not move from a Medicaid-funded category of health care to a CHIP-funded category of BadgerCare Plus. However, a child may move from a CHIP-funded category of BadgerCare Plus to a full-benefit Medicaid program. One exception to this is that a child may not move from a CHIP-funded category of BadgerCare Plus into an earned income or spousal support extension.

SSI MEDICAID

If a child getting SSI Medicaid loses their SSI cash benefits or 1619(b) eligibility, they will keep their SSI Medicaid for the rest of the 12-month continuous coverage period. Their 12-month period is based on the month their most recent enrollment in SSI Medicaid began, since SSI Medicaid does not have applications or renewals.

Example 11: Jill is enrolled in SSI Medicaid as of February 1, 2024. Her 12-month continuous coverage period is February 1, 2024, to January 31, 2025. Jill no longer qualifies for SSI cash benefits in September 2024. She will keep her SSI Medicaid through January 31, 2025.

Example 12: Abdul has been enrolled in SSI Medicaid since May 1, 2021. In July 2024, Abdul loses his SSI cash benefits. He will keep his SSI Medicaid through April 30, 2025.

Example 13: Leo was enrolled in SSI Medicaid since January 1, 2021. In August 2024, Leo loses his SSI cash benefits. He will keep his SSI Medicaid through December 31, 2024. In May 2025, Leo starts getting SSI cash benefits again and he is re-enrolled in SSI Medicaid. He gets a new 12-month continuous coverage period from May 1, 2025, to April 30, 2026.

WWWMA

If a child enrolled in WWWWMA no longer requires treatment or gets health insurance that covers their treatment, they will keep their WWWWMA for the rest of the 12-month continuous coverage period.

CONTACTS

DHS CARES Problem Resolution Team

DHS/DMS/BEEP/NLH/SP

DHS/DMS/BEOT/BF