STATE OF WISCONSIN Department of Health Services Division of Medicaid Services



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Date: October 3, 2025 DMS Operations Memo 25-16

To: Income Maintenance Supervisors

Income Maintenance Lead Workers

Income Maintenance Staff

Affected Programs:	
☐ BadgerCare Plus	☐ Caretaker Supplement
FoodShare	☐ FoodShare Employment
	and Training
☐ SeniorCare	

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Bureau of Eligibility Operations & Training

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Division of Medicaid Services

Enhancements to MAPP Premium Payments

CROSS-REFERENCE

Medicaid Eligibility Handbook, <u>Section 26.5 MAPP Premiums</u>

EFFECTIVE DATE

October 20, 2025, and December 1, 2025

PURPOSE

This memo announces a change to extend the period of time in which a Medicaid Purchase Plan (MAPP) member can pay their ongoing monthly premium before losing MAPP eligibility for non-payment of premium. This memo also announces changes to how applicants will pay an initial MAPP premium and how MAPP members can pay ongoing premiums.

BACKGROUND

MAPP is a premium-based program for individuals with a disability who are working or interested in work. Members with income above 100% of the federal poverty level must pay monthly premiums as a condition of eligibility. These members must pay an initial premium to become eligible for MAPP and then must pay ongoing monthly premiums to maintain their eligibility for MAPP. Currently, initial MAPP premium payments must be paid by check or money order and are collected by the Income

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Maintenance (IM) agency. Initial premium payments cannot be made online or through electronic funds transfer.

For ongoing premiums, MAPP members can make one-time premium payments online but do not have the ability to set up automatically recurring online payments. The only automatic payment options are to enroll in wage withholding or Electronic Funds Transfer (EFT) from a checking or savings account.

To provide more payment options to MAPP applicants and members, DHS is implementing changes to premium payment methods.

Under current policy, if a MAPP member who is subject to a monthly premium does not pay a premium, their MAPP coverage ends at the end of the month in which the unpaid premium was due. DHS is updating this policy to align with federal regulations at 42 CFR 447.55(b)(2) specifying that coverage can be terminated for non-payment of premiums after 60 days.

POLICY

CHANGES TO PAYMENT METHODS

Effective October 20, 2025, individuals may no longer pay their initial or ongoing MAPP premiums to their IM agency. Initial premiums, whether at application or when re-requesting MAPP, must be paid online via ACCESS using a credit card, debit card, or bank account, or by mailing a check or money order to the payment mailbox for processing by the fiscal agent. This will help ensure that premium payments are processed in a timely way.

If an individual brings a premium payment to the agency, the agency must assist them with paying online or mailing their premium payment. In-person premium payments will be processed by the agency only in very limited circumstances, when all of the following criteria are met:

- The individual is unable to pay their premium online.
- The individual's benefits will end before the payment, if mailed, will be processed by the fiscal agent (applicable only to ongoing members).
- The individual has a specific and immediate medical need, where a delay in the beginning of benefits or a temporary closure of benefits will result in not being able to get a prescription or attend a medical appointment prior to the premium being processed.

If a MAPP applicant was pending for the initial premium before October 18, 2025, and was instructed to pay the initial premium to their IM agency, the applicant can pay the initial premium to their IM agency.

Also, effective October 20, 2025, MAPP members can use ACCESS AutoPay to set up automatic monthly ongoing premium payments online via ACCESS using a credit card, debit card, or bank account.

LOSS OF ELIGIBILITY WHEN ONGOING MONTHLY PREMIUM IS NOT PAID

Effective December 1, 2025, if a MAPP member does not pay an ongoing monthly premium, the member will lose MAPP eligibility at the end of the month following the month in which the unpaid premium was due.

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Example 1: Aarav is enrolled in MAPP with an ongoing monthly premium of \$30. Aarav owes a December premium that is due December 10. Aarav does not pay the December premium by the due date. Aarav will continue to remain enrolled in MAPP through the end of January. In late December, Aarav is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. Aarav does not make a premium payment in the month of January. In mid-January, Aarav will be sent a notice that his MAPP coverage will end January 31.

Example 2: Gisele is enrolled in MAPP with an ongoing monthly premium of \$35. Gisele owes a December premium that is due December 10. Gisele submits a \$20 payment on December 3. Although Gisele has not paid the full December premium, she will continue to remain enrolled in MAPP through January. In late December, Gisele is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. The premium amount due for January is \$35 and the past due premium amount for December is \$15. Gisele does not make a premium payment in the month of January. In mid-January, Gisele will be sent a notice that her MAPP coverage will end January 31.

If a MAPP member does not pay an ongoing monthly premium by the due date, but the member pays the premium and the premium is processed in the same month or the next month, the member will remain enrolled in MAPP.

Example 3: Nick is enrolled in MAPP with an ongoing monthly premium of \$25. Nick owes a December premium that is owed and is due December 10. Nick does not pay the December premium by the due date but makes a \$25 payment on December 12 via ACCESS. Nick will remain enrolled in MAPP. In late December, Nick is mailed a premium statement for January.

Example 4: Fatima is enrolled in MAPP with an ongoing monthly premium of \$43. Fatima owes a December premium that is owed and is due December 10. Fatima does not pay the December premium by the due date. She will remain enrolled in MAPP through January. In late December, Fatima is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. Fatima submits a \$43 payment via ACCESS on January 5. The payment is applied to the past due December MAPP premium, and on January 6, ACCESS shows that her December premium is paid. The January premium remains unpaid. Fatima will remain enrolled in MAPP through February. In late January, Fatima is mailed a premium statement for the February premium along with a cover letter that specifies the January premium is late.

Example 5: Ahmed is enrolled in MAPP with an ongoing monthly premium of \$51. Ahmed owes a December premium that is owed and is due December 10. Ahmed does not pay the December premium by the due date. He will remain enrolled in MAPP through January. In late December, Ahmed is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. As of mid-January, Ahmed has not made a payment and is mailed a notice that his MAPP eligibility is ending January 31, due to not paying the December MAPP premium. Ahmed submits a \$51 payment via ACCESS on January 26, and the payment is applied to the past due December MAPP premium. Because Ahmed has now paid the past due December premium, he is eligible for MAPP through the month of February. The January premium remains

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unpaid, and Ahmed is mailed a premium statement for the February premium along with a cover letter that specifies the January premium is late.

Example 6: Yue is enrolled in MAPP and is due for renewal in January. She owes an ongoing monthly premium of \$55. Yue owes a December premium that is owed and is due December 10. Yue does not pay the December premium by the due date. She will remain enrolled in MAPP through January. In late December, Yue is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. Yue submits a renewal on January 7 and is meeting all MAPP eligibility requirements except for paying the December premium. As of mid-January, Yue has not made a payment and is mailed a notice that her MAPP coverage is ending January 31, due to not paying the December premium.

Yue submits a \$55 payment via ACCESS on January 21 that is applied to the past due December MAPP premium. Because Yue has paid the December premium, she is eligible with an ongoing premium of \$55 for MAPP with a new certification period starting February 1. The January premium remains unpaid. Yue is mailed a premium statement for the February premium along with a cover letter that specifies the January premium is late.

If an individual loses MAPP eligibility for any reason, any past due premiums are no longer owed. If an individual re-requests MAPP coverage in the month after the month of closure, the individual does not need to submit a new application but will need to pay any initial MAPP premium(s) to regain MAPP eligibility for the re-request month. If an individual requests MAPP coverage more than one month after the month of closure, the individual may need to submit a new application and will need to pay any initial MAPP premium(s) to regain MAPP eligibility.

Example 7: Rick is enrolled in MAPP with an ongoing monthly premium of \$37. Rick owes a December premium that is owed and is due December 10. Rick does not pay the December premium by the due date. He remains enrolled in MAPP through January. In late December, Rick is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. As of mid-January, Rick has not made a payment and is mailed a notice that his MAPP eligibility is ending January 31, due to not paying the December premium. Rick's last day of MAPP coverage is January 31.

Rick calls his IM agency on February 4 and re-requests MAPP coverage. Because his benefits have been closed less than one calendar month, Rick does not need to submit a new application but does need to pay a \$37 initial premium to become eligible for MAPP beginning in February. Rick submits a \$37 payment via ACCESS on February 5. The payment is applied to the February MAPP premium and Rick is determined eligible for MAPP effective February 1. In late February Rick will be mailed his premium statement for the month of March.

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Example 8: Izzy is enrolled in MAPP with an ongoing monthly premium of \$44. Izzy owes a December premium that is owed and is due December 10. Izzy does not pay the December premium by the due date. She will remain enrolled in MAPP through January. In late December, Izzy is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. As of mid-January, Izzy has not made a payment and is mailed a notice that her MAPP eligibility is ending January 31. Izzy's last day of MAPP coverage is January 31.

Izzy calls her IM agency on March 16 and requests MAPP coverage. Because Izzy's MAPP benefits have been closed for more than one calendar month, she will need to submit a new application to regain MAPP coverage. If her gross income exceeds 100% of the federal poverty level (FPL), she also will need to pay an initial premium before she can enroll in MAPP.

Example 9: Louis is enrolled in MAPP with an ongoing monthly premium of \$48. Louis owes a December premium that is owed and is due December 10. Louis does not make a payment by the due date. On December 12, Louis reports that his total assets exceed the asset limit. Louis is mailed a notice that his MAPP eligibility is ending December 31, due to excess assets. Louis' last day of MAPP coverage is December 31.

Louis calls his IM agency on January 7 and re-requests MAPP coverage. He provides verification that his total assets are now under the asset limit. Because his benefits have been closed less than one calendar month, Louis does not need to submit a new application, but he does need to pay a \$48 initial premium to become eligible for MAPP beginning in January. Louis submits a \$48 payment via ACCESS on January 8. Louis is eligible for MAPP effective January 1. In late January Louis will be mailed his premium statement for the month of February.

If a MAPP member does not pay an ongoing premium and then has an income reduction while still enrolled that results in not being charged a premium, the member will remain enrolled in MAPP without paying any past due premiums.

Example 10: Wei is enrolled in MAPP with an ongoing monthly premium of \$39. Wei owes a December premium that is owed and is due December 10. Wei does not pay the December premium by the due date. He remains enrolled in MAPP through January. In late December, Wei is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. On January 8, Wei reports a reduction in income that began in January and the reduction in income is verified the same day. Wei's income is now under 100% FPL, and he no longer owes a premium for January. Since he no longer owes a premium as of January, Wei will remain enrolled in MAPP for February even if he does not pay the past due December premium.

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Example 11: Amelia is enrolled in MAPP and is due for renewal in January. She has an ongoing monthly premium of \$30. Amelia owes a December premium that is owed and is due December 10. Amelia does not pay the December premium by the due date. Amelia remains enrolled in MAPP for January. In late December, she is mailed a premium statement for the January premium along with a cover letter that specifies the December premium is late. As of mid-January, Amelia has not submitted a renewal and has not made a payment, so she is mailed a notice that her MAPP coverage is ending January 31, due to not completing a renewal and not paying the December premium.

On January 22, Amelia submits a renewal and reports a reduction in income that began in January. The renewal is processed, and the income reduction is verified on January 23. Amelia's income is now under 100% FPL starting in January and she meets all other MAPP eligibility requirements. As a result, Amelia no longer owes a premium starting in January and she is determined eligible for MAPP with a new certification period starting February 1. Since she no longer owes a premium as of January, Amelia will remain enrolled in MAPP even if she does not pay the past due December premium.

CONTACTS

DHS CARES Problem Resolution Team

DHS/DMS/BEEP/NAH DHS/DMS/BEOT/JN