



WISCONSIN DEPARTMENT  
*of* HEALTH SERVICES

# **New Federal Medicaid Work Requirement for BadgerCare Plus**

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Wisconsin Department of Health Services  
(DHS) Webinar

June 18, 2026



# Welcome

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# Background

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The One Big Beautiful Bill Act (OBBBA) requires that states implement a new work requirement for certain Medicaid members for them to keep their health care benefits and coverage.

- In federal law, this is described as “community engagement.”



# Impact of New Federal Medicaid Work Requirement

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Wisconsin Medicaid has about ~1,200,000 members.

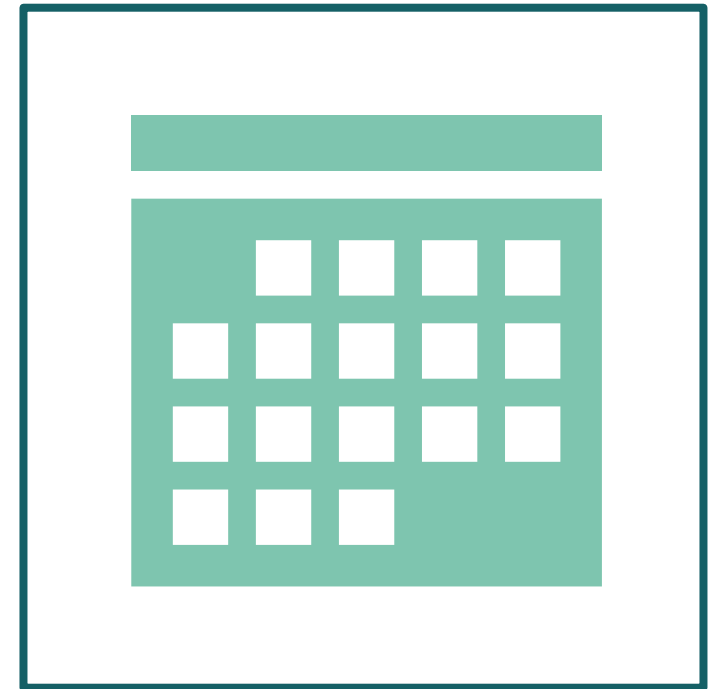
- Of our ~800,000 BadgerCare Plus members, ~200,000 are adults who will be subject to the work requirement.
- Our initial, high-level estimate is that approximately 63,000 members are at risk of losing their health care coverage.



# Implementation Timeline

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- **September 1, 2026:** federal deadline for states to conduct initial member outreach
- **January 1, 2027:** requirement in effect for new applicants
- **March 1, 2027:** most current members subject to new requirement at their next renewal





# Federal Guidance

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- OBBBA was signed into law on July 4, 2025.
  - While it provided basic information about the new policy, it did not include detailed policy information for states.
- On June 1, 2026, the federal government released a 387-page interim final rule with more detailed guidance on work requirements
  - We are analyzing this carefully and will share more information as we have it.
- Today's presentation is based on our current understanding of the requirements, **but it is subject to change.**



# Member Engagement

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- DHS has conducted numerous 1:1 interviews with members to understand:
  - Awareness and understanding of the new federal policy.
  - Potential barriers to meeting the work requirement.
  - How to make it easier for members to meet the new requirement.
- This input has informed and will continue to inform our work on outreach, policy development, and system design.





# Federal Work Requirement

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# Who is Subject to the Work Requirement?



- BadgerCare Plus adults must meet the work requirement or have an exemption if they:
  - Are not pregnant.
  - Are age 19 through 64.
  - Have no dependent children under age 19 in their home.



# Who is Not Subject to the Work Requirement?

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- Any adult who has Wisconsin Medicaid coverage other than BadgerCare Plus won't be subject to the federal Medicaid work requirement.

- ☒ Home and Community-Based Services
- ☒ Institutional Medicaid
- ☒ Medicaid Purchase Plan (MAPP)
- ☒ Medicare Savings Programs
- ☒ Supplemental Security Income (SSI) Medicaid
- ☒ SSI-Related Medicaid
- ☒ Katie Beckett Medicaid
- ☒ SeniorCare
- ☒ Family Planning Only Services
- ☒ Tuberculosis-Only Medicaid
- ☒ Wisconsin Well Woman Medicaid
- ☒ BadgerCare Plus Prenatal Plan
- ☒ Emergency Services Medicaid





# Meeting the Work Requirement

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# How Can People Meet the Work Requirement?

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- If they are not exempt, individuals can meet the work requirement by doing any of the following for one month:

- Working 80 or more hours.
- Volunteering 80 or more hours. This can include court-ordered community service.
- Participating in a work program 80 or more hours.
- Being enrolled in an educational program at least half-time.

- Getting at least \$580 in income.

*Or any combination of these activities for 80 or more hours*



# Timing of New Federal Requirement

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## New applicants

- Starting January 1, 2027, new applicants will need to show they met the work requirement or were exempt in the month before they submitted their application.

## Most existing members

- Starting with renewals due March 31, 2027, most members will need to meet the requirement or be exempt as of their renewal.
  - They must meet the requirement or be exempt for **at least one month** since their eligibility was last determined at application or renewal.



# Exemptions

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People who don't need to meet the work requirement include those who are:

- American Indians and Alaska Natives.
- Caregivers of a dependent child under age 14 or a disabled individual.
- Pregnant.
- Veterans with a total (100%) disability rating.
- Individuals who are medically frail or otherwise have special medical needs.
- Participants in certain drug addiction or alcoholic treatment and rehabilitation programs.



# Exemptions

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People who don't need to meet the work requirement include those who are:

- Inmates of a public institution.
- Individuals who were an inmate of a public institution during the preceding three-month period.
- Individuals in compliance with Temporary Assistance for Needy Families (TANF) Wisconsin Works (W-2) work requirements.
- Members of a household receiving FoodShare (known federally as SNAP) who are not exempt from FoodShare work requirements.



# Exemption: Medical Frailty and Special Needs

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- Individuals who are medically frail or otherwise have special medical needs include those:
  - Who are blind or disabled.
  - With a chronic substance use disorder.
  - With a disabling mental disorder.
  - With a physical, intellectual, or developmental disability that significantly impairs their ability to perform one or more activities of daily living.
  - With a serious or complex medical condition.



# Exemption: Short-Term Hardship Events

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- Wisconsin also intends to offer short-term hardship exemptions for people who:
  - Receive inpatient care.
  - Reside in a county or local jurisdiction with either:
    - ♦ An emergency or disaster declared by the President.
    - ♦ With approval, an unemployment rate at or above the lesser of 8% or 1.5 x the national rate.
  - Must travel outside their community for an extended period to receive medical services necessary for themselves or their dependent that are not available in their community.





# Assessing Compliance

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# How Will Wisconsin Assess Compliance?

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- We will attempt to use all available information to determine compliance or establish an exemption.
  - We will use multiple data sources, including claims data.
- If we don't have information about someone's compliance or exemption status, they will need to take action at application or renewal.
  - This may be by:
    - ♦ Reporting that they are compliant or have a situation that makes them exempt.
    - ♦ Completing a self-attestation form to certify certain types of exemptions.
    - ♦ Providing verification of certain types of activities or exemptions.





# **Compliance vs. Noncompliance Examples**

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# Applicant Example: Kate

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- Applies on February 17, 2027.
- 48 years old, no children under 19 living at home, no exemptions.
- Worked 60 hours as a rideshare driver and volunteered 25 hours with their local animal shelter in January.
  - Total hours of qualifying activities: 85 hours.



Kate **meets** the work requirement until her next renewal.



# Applicant Example: Doug

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- Applies on July 23, 2027.
- 27 years old, no children under 19 living at home, is a veteran with a 20% disability rating.
- Worked a part-time job for a total of 63 hours for June 2027.
- However, if Doug worked at least 80 hours in July, he would meet the work requirement to enroll in coverage as of August 1 without needing to reapply. He would be denied coverage for July.
  - If Doug was denied and then returned in September and was meeting the work requirement, he needs to reapply.



At this time, Doug **does not meet** the work requirement.



# Member Example: Max

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- November 2027 renewal.
- 19 years old, no dependent children under 19 living at home, no exemptions.
- Was enrolled in school half-time in April 2027.



Max **meets** the work requirement until his next renewal.



# Member Example: Jane

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- Requested early renewal in January 2027.
- 36 years old, no children under 19 living at home, no exemptions.
- Did not report any qualifying activities or income since last approved for coverage.



Jane does not meet the work requirement.





# Member Outreach

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# Messaging: Announcing the New Policy

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In August, we will send letters to BadgerCare Plus adult members with no children under 19 living at home. Texts and emails to reinforce this messaging will be sent in September.

These messages will announce the new federal policy and will explain:

- What the work requirement is
- When it takes effect
- Where to learn about exemptions that may apply to them
- How they can meet the work requirement if they don't have an exemption
- Where to go for more information
- What will happen next



# Messaging: Announcing the New Policy

MILWAUKEE ENROLLMENT SERVICES 6055  
N 64TH STREET  
MILWAUKEE WI 53218

Mailing Date: 08/16/2026

000001  
RALPH POOLE  
6055 N 64TH STREET MILWAUKEE  
WI 53218 1547



State of Wisconsin

PIN: 6151454766

Milwaukee Enrollment Services

Phone: 888-947-6583

Fax: 414-438-4580

Online at [access.wi.gov](http://access.wi.gov)



The State of Wisconsin is an equal opportunity service provider. This letter contains information that affects your benefits. If you need this material in a different format because of a disability or if you need this letter translated or explained in your own language, please call 1-888-947-6583. These services are free.

## New for 2027: You May Have to Meet a Federal Medicaid Work Requirement

Due to changes made in the One Big Beautiful Bill Act (OBBBA), starting in 2027, BadgerCare Plus members age 19 through 64 who have no children under age 19 living at home must meet a new federal Medicaid work requirement or have an exemption to keep their health care coverage. This letter tells you how these changes could affect you.

**At your next renewal after March 1, 2027, you may need to show that you have an exemption or that you have met the requirement.**

**You do not need to take any action right now.**

The work requirement does not start until 2027. We want you to know this information now so you can prepare. Keep your contact information up to date if you move so we can continue to reach you.

**When the requirement starts, you may qualify for an exemption.**

You do not have to meet the work requirement if you have an exemption. Some examples of exemptions are having a serious medical condition, being pregnant, or being a Tribal member. It's important to review the full list of exemptions at [dhs.wi.gov/medicaid/work.htm](https://dhs.wi.gov/medicaid/work.htm) to see if you may qualify.

**If you don't have an exemption, you will need to meet the new federal Medicaid work requirement when you renew your coverage.**

You will need to show that you met the work requirement in a **single month** since you were last approved for health care coverage. You will have met the work requirement if you can show:

- You did one or more of the following qualifying activities for 80 hours or more in a single month:
  - Working (including self-employment and in-kind work)
  - Volunteering





## Medicaid Work Requirement

### Find out if you may be affected by Medicaid work requirement

Find out if you may be affected by Medicaid work requirements **after January 2027**.

A new federal Medicaid work requirement will affect some members enrolled in BadgerCare Plus. Answer a few questions to find out if the work requirement might apply to you.

#### Before you start, you should know:

- This screening tool is for informational purposes only. It is not an application nor a formal decision.
- Information entered here is only used to help people understand what the new federal work requirement might mean for them.
- Questions in this tool have been simplified. If you are a BadgerCare Plus member who may have to meet the work requirement, we will send you a letter to let you know what you need to do and when.
- The result you get is based on your answers to the questions in the tool. Some of your answers may change over time. If your answers change (like if you turn 19 or your income changes), the results of this tool may change as well.

**Important:** No matter what the results of this tool say, you should still watch your mail for letters, read them, and follow all directions. If we ask you to send information or documents, it is important that you do so right away. If you don't, you could lose your health care coverage.

# Screening Tool Demo



# Contact Us

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Send your questions and feedback to the ForwardHealth Partner inbox.

[DHSForwardHealthPartners@dhs.wisconsin.gov](mailto:DHSForwardHealthPartners@dhs.wisconsin.gov)





# Questions and Answers

Slide 30



# Contact Us

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# Thank you!

Protecting and promoting the  
health and safety of the people  
of Wisconsin



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