



WISCONSIN DEPARTMENT
of HEALTH SERVICES

Exploring the New Federal Medicaid Work Requirement in Wisconsin

Wisconsin Department of Health Services
(DHS) Webinar

July 30, 2026



Welcome



Presenters

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Agenda

- Welcome
- Background
- Exemption Questions
- Work Activity Scenarios
- Communications
- Next Steps



Questions



- Today we'll provide answers to many questions we've received from our partners.
- You can use the Q&A function to ask new questions, but we will not answer them today.
- We'll provide answers to common questions on our website and in future webinars.



Multistate Lawsuit

- On June 29, Wisconsin joined 24 other states and D.C. in suing the U.S. Department of Health and Human Services over a federal rule implementing new Medicaid work requirements.
- The lawsuit states the rule oversteps the authority of the federal legislation (OBBA).
- The rule makes it difficult for medically vulnerable people to receive an exemption and maintain Medicaid health care coverage.



Reminder: Potential Impact to Members

- Wisconsin Medicaid has ~1,200,000 members.
- Of the ~800,000 enrolled in BadgerCare Plus, ~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.





Background



New Federal Medicaid Work Requirement

- OBBBA requires that states implement a new work requirement (described in federal law as “community engagement”) for certain Medicaid members as of January 1, 2027.
- In Wisconsin, this applies to the BadgerCare Plus “childless adult” eligibility group, which includes BadgerCare Plus members who are age 19 through 64, are not pregnant, and have no dependent children under age 19 in their home.



Who is Not Subject to the Work Requirement?

- Individuals younger than 19 or older than 64.
- Adults with coverage other than BadgerCare Plus.
 - This includes people enrolling in or enrolled in:
 - ♦ Long-term care or Home and Community-Based Services programs.
 - Example: Family Care and IRIS
 - ♦ Programs for older adults and people with disabilities.
 - Example: Medicaid Purchase Plan
 - ♦ Supplemental Security Income (SSI) Medicaid.
 - ♦ Limited-benefit plans.
 - Example: Family Planning Only Services and Emergency Services Medicaid



Who is Exempt from the Work Requirement?

- American Indians and Alaska Natives.
- Caregivers of a dependent child under age 14 or a disabled individual.
- Someone who is pregnant or was pregnant in the last 12 months.
- Veterans with a total (100%) disability rating.
- Participants in certain drug addiction or alcoholic treatment and rehabilitation programs.
- Individuals who are medically frail or otherwise have special medical needs.
- Inmates of a public institution.
- Individuals who were an inmate 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.
- Individuals experiencing a qualifying short-term hardship event.



Timing of the New Federal Requirement

New applicants

- Starting January 1, 2027, new applicants will need to meet the requirement or be exempt.
 - They must meet the requirement in the calendar month before they submitted their application or be exempt.

Current members

- For renewals due March 31, 2027, and later, a member must have met the work requirement in any one month since they were last approved for coverage or be exempt.
 - Example: someone with a June 30, 2027, renewal date must have met the requirement for one month between July 2026 and June 2027.



Work Activities to Meet the Requirement

- Members have to meet the work requirement **in a single month** in the period since they were last approved for health care coverage, which is usually the last year.
- A member can meet it by doing one or more qualifying activities for 80 hours or more in a single month:
 - Working (including self-employment, in-kind, or unpaid work)
 - Volunteering
 - Participating in a work program that assists with learning new skills and supporting career development



Other Activities to Meet the Requirement

- They can also meet it by:
 - Going to school or attending an educational program at least half-time in a single month since they were last approved for health care coverage.
 - ♦ If they attend less than half-time, they can combine the time in school with other qualifying activities.
 - Getting at least \$580 in income in a single month since the last time they were approved.



How Will Wisconsin Assess Compliance?

- We will attempt to use all available information to determine compliance or establish an exemption without member action.
 - We will use multiple data sources, including claims data.
- We will only require action from the individual if we don't have information about their compliance or exemption status at application or renewal.
- Members may need to report they are compliant or have an exemption.
- Providers will not have to fill out DHS forms for medical exemptions.





Exemption Questions



When parents have shared custody of children, are they subject to the work requirement?

Answer

A parent is not subject to the work requirement if their dependent child under 19 lives with them at least 40% of the time.



Example—Shared Custody

- Divorced parents Charlie (age 44) and Shana (age 41) are both BadgerCare Plus members. They have two children.
- Depending on the custody arrangement, each parent may or may not be subject to the work requirement.
 - With 50/50 or 60/40 custody, neither Charlie nor Shana would be subject to the work requirement.
 - With 70/30 or 80/20 custody, the primary custodial parent would not be subject to the requirement. The other parent would need to meet it.



Does someone with a disability determination from the Social Security Administration have to get another determination to be exempt?

Answer

No, they are automatically exempt. The Social Security Administration provides this information to us and the member does not need to act.



Do people who are in BadgerCare Plus and also a Medicaid long-term care program need to act to be exempt?

Answer

No, they are automatically exempt.



How does a new applicant with a serious or complex medical condition document it?

Answer

At application, we'll ask if they have a serious or complex medical condition. No further action is needed by the applicant.



If a current member has a serious or complex medical condition, will they need to have their medical provider fill out a form?

Answer

No, they do not need a form. We will use information we have on file first to confirm their condition. If needed, we will ask the member to self-attest to having a serious or complex medical condition at renewal.



We have received questions about other potential exemptions. Can states add any other exemptions beyond federal law?

Answer

No, states cannot add exemptions beyond federal law.





Work Activity Scenarios



What types of work count toward the 80-hour requirement?

Answer

Work can include:

- Hours someone is getting paid for
- Hours in exchange for goods or services (in-kind)
- Unpaid hours (such as an internship)

Working 80 hours in one month is just one way to meet the requirement.



Example—Types of Work

- Amara (age 55), has adult children. She participates in a work program 10 hours a week and does chores at her apartment complex 10 hours a week in exchange for reduced rent.
- Amara meets the requirement, because the hours added together are at least 80 hours in a month.



Within what time frame does a new applicant have to meet the work requirement to be eligible for Medicaid?

Answer

As a new applicant, they will need to meet the requirement in the calendar month before they submit their application, if they are not exempt.



Example 1—New Applicant

- Francisco (age 55) is a childless adult. He applies in March 2027. He worked 100 hours in February 2027 and then his temporary job ended.
- Francisco meets the work requirement.



Example 2—New Applicant

- Santiago (age 29) applied on January 11, 2027. He worked 15 hours in December 2026 and 85 hours in January 2027.
- He would be denied for January but approved for February based on the January hours.



Example 3—New Applicant

- Chloe (age 19) is a new applicant who is subject to the work requirement. She applies in June 2027, but she was last employed in March 2027. She does not qualify for any exemptions.
- Chloe does not meet the work requirement. Her application will be denied.
- Chloe can reapply at any time.



How long does someone have to work to be eligible as a current member when they are completing their annual renewal?

Answer

One month since their last renewal or application.



Example 1—Current Member

- Mei (age 49) is due for renewal in August 2027. Her last job ended in October 2026, and she worked 80 hours in that month.
- At her August 2027 renewal, Mei will be determined compliant with the work requirement because she met it in one month in the 12 months since her last renewal.



Timeline for Example 1

Mei's current eligibility: September 2026 through August 2027.

September 2026	October 2026	November 2026	December 2026	January 2027	February 2027	March 2027	April 2027	May 2027	June 2027	July 2027	August 2027
1 st month	2 nd month	3 rd month	4 th month	5 th month	6 th month	7 th month	8 th month	9 th month	10 th month	11 th month	12 th month



September 2027	October 2027	November 2027	December 2027	January 2028	February 2028	March 2028	April 2028	May 2028	June 2028	July 2028	August 2028
1 st month	2 nd month	3 rd month	4 th month	5 th month	6 th month	7 th month	8 th month	9 th month	10 th month	11 th month	12 th month

Mei remains eligible from September 2027 to August 2028 because of her work in October 2026, but she will need to meet the requirement in at least one month to remain eligible *after* August 2028.



Example 2—Current Member

- Omar (age 22) is due for renewal September 2027. He is working 25 hours per week, so he meets the work requirement. His new eligibility period is October 2027 through September 2028.
- Omar loses his job in January 2028.
- By working more than 80 hours in at least one month during his renewal period, he has met the work requirement.



Example 3—Current Member

- Ab (age 36) is due for renewal in April 2027. They complete the renewal on April 1 and met the work requirement due to a job with 80 hours or more per month. Their new eligibility period begins May 1.
- Ab loses their job on April 19 - before the new eligibility period begins. They are still eligible through April 2028.
- Ab must meet the work requirement in a single month between May 2027 and April 2028 or have an exemption. Otherwise, they will not meet the work requirement at their next renewal in April 2028.



Example 4—Current Member

- Dolores (age 60) is due for renewal April 2027. She has not worked in the last year and is not currently employed.
- Dolores started a new job on April 1 and worked 80 hours that month.
- Therefore, Dolores meets the work requirement and is eligible from May 2027 through April 2028.





Communications



Initial Member Notification

- August: federally required letters to BadgerCare Plus adult members with no dependent children under 19 at home
- September: texts and emails to reinforce this messaging

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



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 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



Website and Screening Tool

 WISCONSIN DEPARTMENT
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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.

dhs.wi.gov/medicaid/work.htm

- 1,319 unique visitors
- 459 returning visitors
- Total 1,952 page views

dhs.wi.gov/medicaid/work-tool.htm

- 1,246 users started
- 1,069 (~86%) completed

Results through July 28, 2026



Role of Partners



Amplify our member messages

- Keep contact information up to date
- Sign up for texts and emails
- Set up an ACCESS account and get the MyACCESS app to see letters from us online



Be prepared to respond to member inquiries

- Use partner toolkit materials, including outreach cards and fact sheets
- Ask for new materials or translations to existing materials if needed



Partner Toolkit



dhs.wi.gov/forwardhealth/partners/toolkit.htm

Federal Medicaid Work Requirement:
Who needs to meet it?

*Other activities may count, too, like having an internship, volunteering, going to school, or getting more than a certain amount of income.

Who needs to meet the federal work requirement?
You may need to meet the work requirement if ALL of these apply to you:

- You are enrolled in BadgerCare Plus health care coverage.
- You are between 19 and 64 years old.
- You are not pregnant.
- You are not the parent or guardian of a dependent child under 19 who lives with you at least 40% of the time.

Within this group, there are many people who will not need to meet the work requirement because they have an exemption. Exemptions are reasons for the grant that you don't need to meet the work requirement, like if you have a disability or serious medical condition, or are a Tribal member.

More information
Use our online Federal Work Requirement Screening Tool to check whether you may have to meet the work requirement. Go to dhs.wi.gov/medicaidwork.htm or scan the QR code with your phone.

For more information about the new federal work requirement, visit dhs.wi.gov/medicaidwork.htm or scan the QR code with your phone.

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Federal Medicaid Work Requirement:
How to meet it

*Other activities may count, too, like having an internship, volunteering, going to school, or getting more than a certain amount of income.

As a reminder, the federal Medicaid work requirement only applies to you if you are a BadgerCare Plus member between 19 and 64 who is not pregnant and doesn't have a dependent child living with you at least 40% of the time.

Even if the requirement applies to you, there are many reasons why you might not need to meet it. These are called exemptions.

You only need to meet the work requirement in a single month
For current members, or your renewal, we will look back and see if you met the work requirement in one month since you were last approved for coverage. In most cases, this will be in the last 12 months.

For new applicants, we will look at the month before you apply to see if you were meeting the work requirement.

You are meeting the work requirement if you:

- Do one or more of these qualifying activities for 80 hours or more in a single month:
 - Working, including self-employment, unpaid work, and getting goods and services in exchange for work (in-kind)
 - Volunteering
 - Participating in a work program that assists with learning new skills and supporting career development
- Go to an approved school or an educational program at least half-time in a single month.
 - If you attend less than half-time, you can combine the hours you are in school with the other qualifying activities.
- Get at least \$200 in income in a single month.

More information
For more information about ways to meet the work requirement, who needs to meet the work requirement, and exemptions, visit dhs.wi.gov/medicaidwork.htm or scan the QR code with your phone.

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Federal Medicaid Work Requirement:
Key information for parents

This takes effect January 1, 2027, but does not apply to current members until their next renewal starting March 2027.

What does the work requirement mean for parents?

- In Wisconsin, the work requirement does not apply to parents or caretaker relatives living with and caring for a dependent child under 19.
- The work requirement does not apply to you as long as your child lives with you at least 40% of the time. If you share custody with someone, the work requirement would not apply to you if you have at least 40% custody.
- If your child lives with you less than 40% of the time, you may need to meet the work requirement if all of these apply to you:
 - You are enrolled in BadgerCare Plus health care coverage.
 - You are not pregnant.
 - You are between 19 and 64 years old.
- If you are a parent or guardian and there is a change to your custody, make sure to report that change in ACCESS or with your local agency. If your custody changes, you may not need to meet the work requirement at your next renewal.

More information
For a complete list of who needs to meet the work requirement and all the possible exemptions, visit dhs.wi.gov/medicaidwork.htm or scan the QR code with your phone.

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Federal Medicaid Work Requirement:
Who is exempt?

*Other activities may count, too, like having an internship, volunteering, going to school, or getting more than a certain amount of income.

As a reminder, the federal Medicaid work requirement only applies to you if you are a BadgerCare Plus member between 19 and 64 who is not pregnant and doesn't have a dependent child living with you at least 40% of the time.

Even if the requirement applies to you, there are many reasons why you might not need to meet it. These are called exemptions.

You do not need to meet the work requirement if:

- You are a member of an American Indian Tribe or an Alaska Native, or are the child or grandchild of Tribal member.
- You are a caregiver of a child under age 14.
- You are the caregiver of someone who has a disability.
- You have a disability determination from the Social Security Administration.
- You are in a qualifying drug addiction or alcoholic treatment and rehabilitation program.
- You are currently in prison or jail, or were in prison or jail in the past three months.
- You are a veteran with a total (100%) disability rating.
- You are enrolled in FoodShare and not exempt from FoodShare work requirements.
- You are complying with the Wisconsin Works (W-2) work requirements.
- You have a serious or complex medical condition.
- You have a chronic substance use disorder.
- You have a disabling mental disorder.
- You have a physical, intellectual, or developmental disability that significantly impairs your ability to perform one or more activities of daily living.
- You have a qualifying short-term hardship situation, such as a hospital stay or needling to travel outside of your community for a medical care.
- You are enrolled in a Medicaid long-term care program (IRIS, Family Care, Family Care Partnership, PACE).

More information
To learn more about exemptions, visit dhs.wi.gov/medicaidwork.htm or scan the QR code with your phone.

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Federal Medicaid Work Requirement:
Info for Tribal members

This takes effect January 1, 2027, but does not apply to current BadgerCare Plus members until their next renewal starting March 2027.

What does the work requirement mean for Tribal members?
The federal government is introducing a new Medicaid work requirement. Tribal members are exempt from the federal Medicaid work requirement. This means that you do not need to meet the work requirement if you are a member of a tribe or are the child or grandchild (first or second degree) of a Tribal member.

When the work requirement starts, you will be asked about your Tribal status when you apply for or renew your health care coverage through BadgerCare Plus.
If you tell us that you are a Tribal member in the child or grandchild (first or second degree) of a Tribal member, you will be exempt from the work requirement. This will be kept on file and you won't have to report it again.

If we do not have your Tribal status on file, you will get a letter before your renewal telling you that you need to meet the work requirement.
If you get this letter, call your local or Tribal agency as soon as possible to let them know that you are a Tribal member or are the child or grandchild (first or second degree) of a Tribal member.

Some important things to keep in mind:

- You do not need to be a member of a federally recognized tribe to be exempt.
- In most cases, when this policy starts, you can report your Tribal status and don't need to provide documentation.
- If your spouse is not a Tribal member, the exemption will not apply to them. But, there could be other exemptions that apply to them.

More information
For more information about the work requirement, visit dhs.wi.gov/medicaidwork.htm or scan the QR code with your phone.

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Federal Medicaid Work Requirement:
Key information for people with disabilities

This takes effect January 1, 2027, but does not apply to current members until their next renewal starting March 2027.

What does the work requirement mean for someone with a disability?
The new federal work requirement only applies to some Medicaid members enrolled in BadgerCare Plus. If you have a disability determination from the Social Security Administration, you don't have to meet the work requirement.

If you don't have a disability determination or are waiting for one, but you receive services through one of Wisconsin's long-term care programs (Family Care, Partnership, IRIS, or PACE), you don't have to meet the work requirement.

If you don't have a disability determination or are waiting for one, but you have a serious or complex medical condition that affects your ability to work, you don't need to meet the work requirement.

More information
For a complete list of who needs to meet the work requirement and all the possible exemptions, visit dhs.wi.gov/medicaidwork.htm or scan the QR code with your phone.

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Next Steps



Resources and Contact Us



Visit our DHS webpages:

- dhs.wi.gov/medicaid/news.htm
- dhs.wi.gov/medicaid/work.htm
- dhs.wi.gov/medicaid/work-tool.htm



Email your feedback and questions to
DHSForwardHealthPartners@dhs.wisconsin.gov



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health and safety of the people
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