



Overview: The Monitoring Report for the section 1115 eligibility and coverage demonstrations consists of a Monitoring Report Workbook (Part A), Monitoring Report Template (Part B), and a Budget Neutrality Workbook (Part C). Each state with an approved eligibility and coverage policy in its section 1115 demonstration shall complete only one Monitoring Report Template (Part B) that encompasses all eligibility and coverage policies approved in its demonstration as well as the demonstration overall, in accordance with the demonstration's special terms and conditions (STC). This Monitoring Report Template (Part B) is applicable for section 1115 demonstrations with **any eligibility and coverage policies**. This document is provided for illustrative purposes and is not intended to be completed by the state. Each state shall receive from its CMS section 1115 demonstration team a Part B Monitoring Report Template that is specifically tailored to reflect the composition of the eligibility and coverage policies in the state's demonstration. For more information and any questions, the state should contact the CMS section 1115 demonstration team.

**Medicaid Section 1115 Eligibility and Coverage Demonstrations
Monitoring Report Template**

Note: PRA Disclosure Statement to be added here

1. Title page for the state’s eligibility and coverage demonstration or eligibility and coverage policy components of the broader demonstration

This section collects information on the approval features of the state’s section 1115 demonstration overall, followed by information for each eligibility and coverage policy. The state completed this title page as part of its eligibility and coverage monitoring protocol(s). The state should complete this table using the corresponding information from its CMS-approved monitoring protocol(s) and submit this as the title page of all monitoring reports. The content of this table should stay consistent over time. Definitions for certain rows are below the table.

Overall section 1115 demonstration	
State	Wisconsin
Demonstration name	BadgerCare Reform
Approval period for section 1115 demonstration	(10/31/2018 - 12/31/2029)
Demonstration year and quarter	DY11Q4
Reporting period	10/1/2024-12/31/2024

Notes:

- 1. Eligibility and coverage demonstration start date:** For monitoring purposes, CMS defines the start date of the demonstration as the *effective* date listed in the state’s STCs at time of eligibility and coverage demonstration approval. For example, if the state’s STCs at the time of eligibility and coverage demonstration approval note that the demonstration is effective January 1, 2020 – December 31, 2025, the state should consider January 1, 2020 to be the start date of the demonstration. Note that that the effective date is considered to be the first day the state may begin its eligibility and coverage demonstration. In many cases, the effective date is distinct from the approval date of a demonstration; that is, in certain cases, CMS may approve a section 1115 demonstration with an effective date that is in the future. For example, CMS may approve an extension request on December 15, 2020, with an effective date of January 1, 2021 for the new demonstration period. In many cases, the effective date also differs from the date a state begins implementing its demonstration.
- 2. Implementation date of policy:** The date of implementation for each eligibility and coverage policy in the state’s demonstration.

2. Executive summary

The executive summary should be reported in the fillable box below. It is intended for summary-level information only. The recommended word count is 500 words or less.

The State of Wisconsin was approved for the extension and amendment of the BadgerCare Reform Waiver as of October 31, 2018, authorizing the Wisconsin Division of Medicaid Services to operate the BadgerCare Reform Services through December 31, 2023.

The BadgerCare Reform demonstration primarily provides authority for the state to provide a robust benefit package to non-pregnant, non-disabled, non-elderly childless adults with incomes of up to and including 100 percent of the FPL. This demonstration approval continues coverage for this population for five years.

The state of Wisconsin received a letter from CMS about our ongoing effort to implement the requirements for our Continuous Engagement module. The letter explained that in light of the ongoing disruptions caused by the COVID-19 pandemic, Wisconsin's community engagement requirement risks significant coverage losses and harm to beneficiaries. For the reasons discussed below, CMS is now withdrawing approval of the community engagement requirement in the October 31, 2018 extension of the BadgerCare Reform demonstration, which is not currently in effect and which would have expired by its terms on December 31, 2023.

Section 1115 of the Social Security Act (the Act) provides that the Secretary of Health and Human Services (HHS) may approve any experimental, pilot, or demonstration project that, in the judgment of the Secretary, is likely to assist in promoting the objectives of certain programs under the Act. In so doing, the Secretary may waive Medicaid program requirements of section 1902 of the Act, and approve federal matching funds per section 1115(a)(2) for state spending on costs not otherwise match-able under section 1903 of the Act, which permits federal matching payments only for "medical assistance" and specified administrative expenses. Under section 1115 authority, the Secretary can allow states to undertake projects to test changes in Medicaid eligibility, benefits, delivery systems, and other areas across their Medicaid programs that the Secretary determines are likely to promote the statutory objectives of Medicaid.

The letter also stated, under section 1115 and its implementing regulations, CMS has the authority and responsibility to maintain continued oversight of demonstration projects in order to ensure that they are currently likely to assist in promoting the objectives of Medicaid. CMS may withdraw waivers or expenditure authorities if it "find[s] that [a] demonstration project is not likely to achieve the statutory purposes." 42 C.F.R. § 431.420(d); see 42 U.S.C. § 1315(d)(2)(D). 2018, the state has not yet implemented the community engagement requirement. Since that time, the COVID-19 pandemic and its expected aftermath have made the BadgerCare Reform community engagement requirement infeasible. In addition, implementation of the community engagement requirement is currently prohibited by the Families First Coronavirus Response Act (FFCRA), Pub. L. No. 116-127, Div. F, § 6008(a) and (b), 134 Stat. 208 (2020), which conditioned a state's receipt of an increase in federal Medicaid funding during the pandemic on the state's maintenance of certain existing Medicaid parameters. Wisconsin has chosen to claim the 6.2 percentage point FFCRA Federal Medical Assistance Percentage (FMAP) increase, and

therefore, while it does so, must maintain the enrollment of beneficiaries who were enrolled as of, or after, March 18, 2020.

The letter noted that, although the FFCRA's bar on disenrolling such beneficiaries will expire after the COVID-19 public health emergency ends, CMS still has serious concerns about testing policies that create a risk of substantial loss of health care coverage and harm to beneficiaries even after the expiration of the bar on disenrolling beneficiaries. The COVID-19 pandemic has had a significant impact on the health of Medicaid beneficiaries. Uncertainty regarding the current crisis and the pandemic's aftermath, and the potential impact on economic opportunities (including job skills training, work and other activities used to satisfy the community engagement requirement, i.e., work and other similar activities), and access to transportation and affordable child care, have greatly increased the risk that implementation of the community engagement requirement approved in this demonstration will result in substantial coverage loss. In addition, the uncertainty regarding the lingering health consequences of COVID-19 infections further exacerbates the harms of coverage loss for Medicaid beneficiaries.

Accordingly, the letter indicated that, taking into account the totality of circumstances, CMS had preliminarily determined that allowing the community engagement requirement to take effect in Wisconsin would not promote the objectives of the Medicaid program. Therefore, CMS provided the state notice that we were commencing a process of determining whether to withdraw the authorities approved in the BadgerCare Reform demonstration that permit the state to require work and other community engagement activities as a condition of Medicaid eligibility through the demonstration. The letter explained that if CMS ultimately determined to withdraw those authorities, it would "promptly notify the state in writing of the determination and the reasons for the amendment and withdrawal, together with the effective date, and afford the state an opportunity to request a hearing to challenge CMS's determination prior to the effective date." *Id.*

The letter indicated that, if the state of Wisconsin wished to submit to CMS any additional information that in the state's view may warrant not withdrawing those authorities, such information should be submitted to CMS within 30 days. CMS have not received any additional information from Wisconsin in response to the February 12, 2021, letter.

In light of these concerns, for the reasons set forth below, CMS has determined that, on balance, the authorities that permit Wisconsin to require work and community engagement as a condition of eligibility are not likely to promote the objectives of the Medicaid statute. Therefore, we are withdrawing the community engagement authorities that were added in the Secretary's October 31, 2018 extension approval of the BadgerCare Reform demonstration.

Per guidance from CMS, starting in DY7 the Transitional Medicaid Assistance (TMA) population is no longer considered a part of the target population for the waiver. Based on this, the State of Wisconsin will no longer be submitting data on this population.

3. Narrative information on implementation, by eligibility and coverage policy and reporting topic

The state should refer to the templates for each eligibility and coverage policy included in its demonstration for policy-specific narrative information on implementation relevant to its demonstration.

4. Narrative information on implementation for any demonstration with eligibility and coverage policies

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
AD.Mod_1 Metrics and operations for any demonstrations with eligibility and coverage policies (Any demonstration topics are applicable for reporting on the state’s broader section 1115 demonstration. In support of CMS's efforts to simplify data collection and support analysis across states, report for <u>all beneficiaries in the demonstration</u> , not only those subject to eligibility and coverage policies.)			
AD.Mod_1.1 Metric trends			

<p>1.1.1 Discuss any data trends related to overall enrollment in the demonstration. Describe and explain changes (+ or -) greater than two percent.</p>		<p>AD_1-5</p>	<p>In the fourth quarter of demonstration year 11 the number of unique program participants increased from 212176 to 214712. This represents a 1% increase from the prior quarter of the total number of unique program participants. This quarter represents a continuation of the public health emergency unwinding, where states were actively reassessing eligibility status and this may impact enrollment. There were 20,520 new enrollees this quarter.</p> <p>Annual Enrollment - In demonstration year 11 the total number of childless adults enrolled in the program decreased. From the beginning to the end of demonstration year 11 the total number of unique program participants decreased from 252,634 to 214,712. Total monthly enrollment decreased from the start to the end of the demonstration year with 238,611 childless adults in January 2024 to 200,240 childless adults in December 2024. This data reflects both enrollment that occurred after the implementation of comprehensive changes in response to COVID-19, based on provisions in the Families First Coronavirus Response Act, to stop terminations and reinstate benefits for individuals whose eligibility was denied or terminated based on policies in the demonstration waiver and when the Families First Coronavirus Reponse Act which ended in April 2023.</p> <p>The graph in Fig 1 in Attachment A shows the childless adults enrollment trend over the last 5 years of the demonstration. Table 1 shows the enrollment summary for the unique program participants for childless adults over the last 5 years of the demonstration as well.</p> <p>The graph in Fig 2 shows the trend for total enrollment by Federal Poverty Level (FPL) for demonstration year 11. In</p>
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			<p>demonstration year 11 the total enrollment for childless adults by FPL has decreased from 195,464 to 168,184 for Childless Adults with FPL <50% and 43,725 to 35,448 for Childless adults with FPL 50-100%.</p> <p>In demonstration year 11 the total number of new enrollees decreased from Q1 to Q2 and increased in Q3 and again in Q4. This metric includes all individuals who applied and are eligible Childless Adults who have not received Medicaid benefits within the last 3 months, and who are not being re-instated while in a restrictive re-enrollment period (RRP) in the report month. See fig 3 in Attachment A for the new enrollee trend.</p> <p>Outreach/Innovative Activities to Assure Access</p> <p>All HMOs serving BadgerCare Plus members, which includes members of this demonstration waiver population, but are not limited to the demonstration population, are required to submit their member communication and outreach plans to the Department of Health Services (DHS) for review. All materials are reviewed and approved by the DHS prior to distribution to members. Such materials include HMO-developed member handbooks, HMO-developed new member enrollment materials, and HMO-developed brochures.</p> <p>The DHS also contracts with the City of Milwaukee Health Department to focus on outreach to current and prospective BadgerCare Plus members in Milwaukee County. As part of this agreement, staff is available at multiple locations throughout the county, including Milwaukee Health Department sites, in order to provide</p>
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Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
			<p>assistance with ACCESS applications and renewals, as well as with other enrollment and eligibility troubleshooting.</p> <p>Collection and Verification of Encounter Data and Enrollment Data</p> <p>Managed care enrollment for demonstration year 10 shows relatively stable enrollment with approximately 85% of all childless adults enrolled in managed care which is comparable with managed care enrollment for other BadgerCare Plus populations. Table 2 in attachment A provides a breakout of the BadgerCare plus HMO childless Adult Enrollment.</p>

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
1.1.2 Discuss any data trends related to mid-year loss of demonstration eligibility. At a minimum, changes (+ or -) greater than two percent should be described.		<i>AD_6-10</i>	<p>The State of Wisconsin does not have any mid-year loss of demonstration eligibility data trend to report this quarter. There were 21,643 beneficiaries who were determined ineligible for Medicaid other than at renewal and 21,297 after the state processed a change in circumstance. 3,965 beneficiaries were no longer eligible for the demonstration due to transfer to another Medicaid eligibility group.</p> <p>Annual Disenrollment: The state of Wisconsin does not have any annual mid-year loss of demonstration eligibility data trend to report. Fig 4, in Attachment A provides data on other ineligibility trends.</p>
1.1.3 Discuss any data trends related to enrollment duration at time of disenrollment. Describe and explain changes (+ or -) greater than two percent.		<i>AD_11-13</i>	<p>This metric is recommended, but not required. The state of Wisconsin has reviewed the recommended metrics provided by CMS but at this point Wisconsin plans to satisfy the required metrics prior to completing any recommended metrics.</p>

<p>1.1.4 Discuss any data trends related to renewals. Describe and explain changes (+ or -) greater than two percent.</p>		<p>AD_14-21</p>	<p>The total beneficiaries whose renewals were completed this quarter decreased from 16,243 to 16068. This represents a 1% change from the previous quarter.</p> <p>1,893 of those beneficiaries were determined ineligible and disenrolled from Medicaid for the same reasons noted above: voluntarily declining benefits or no longer being a resident of the state (including individuals who passed away). 383 were determined ineligible because they transferred to another Medicaid eligibility category. 4,148 beneficiaries were disenrolled from Medicaid because they did not complete their renewal and 8,229 retained eligibility by completing their renewal forms.</p> <p>Annual Renewal – In demonstration year 11 the total number of beneficiaries whose renewals were completed has decreased. From the beginning to the end of demonstration year 11 the total number beneficiaries whose renewal were completed decreased from 44869 to 16068. This comprises of data, during the public Health Emergency (PHE), where the state of Wisconsin has adjusted its policies where we have been postponing renewals for beneficiaries as well as data when the PHE ended in April 2023. The graph in Fig 5 in the accompanying attachment A shows the childless adult's renewal trend for demonstration year 11.</p> <p>Fig 6, in Attachment A provides data on additional renewal trends. Beneficiaries who were determined ineligible for the demonstration at renewal and disenrolled from Medicaid decreased from 7,309 in the first quarter to 1,893 in the fourth quarter. Beneficiaries determined ineligible for the demonstration at renewal because they transferred to another Medicaid eligibility category decreased from 1318 in the first quarter to 383 in the fourth quarter. Beneficiaries disenrolled from Medicaid</p>
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Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
			because they did not complete their renewal decreased from 23,384 to 4,148 and Beneficiaries who retained eligibility for the demonstration after completing their renewal forms decreased from 9645 in the first quarter to 8,229 in the fourth quarter.
1.1.5 Discuss any data trends related to cost sharing limits. Describe and explain changes (+ or -) greater than two percent.		AD_22	
1.1.6 Discuss any data trends related to appeals and grievances. Describe and explain changes (+ or -) greater than two percent.		AD_23-27	<p>The total beneficiaries who met their cost sharing limit this quarter was 550. There was no change from the previous quarter.</p> <p>Annual CostShare In demonstration year 11 the total number of childless adults who met their cost share decreased from Q1 to Q4.</p> <p>The graph in Fig 7 in Attachment A shows the childless adults cost share trend since it was put in place for the demonstration.</p>

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
<p>1.1.7 Discuss any data trends related to access to care. Describe and explain changes (+ or -) greater than two percent.</p>		<p>AD_28-36</p>	<p>Metric 29 and 30: The total number of primary care providers enrolled to deliver Medicaid services this quarter increased from 27,835 to 28,506. This represents a 2.4% change from the prior quarter. Of those primary care providers 10,165 delivered Medicaid services with service claims for 3 or more demonstration beneficiaries.</p> <p>Metric 31 and 32: The total number of specialist providers enrolled to deliver Medicaid services this quarter increased from 55903 to 57515. This represents a 2.8% change from the prior quarter. Of those specialist providers 14,307 delivered Medicaid services with service claims for 3 or more demonstration beneficiaries</p> <p>Metric 35 and 36: The total utilization of emergency department (ED) visits for the demonstration beneficiary months during this quarter is 100.6 per 1000. There were 0 non-emergent ED visits this quarter.</p>

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
1.1.8 Discuss any data trends related to quality of care and health outcomes. Describe and explain changes (+ or -) greater than two percent.		AD_37-43	
1.1.9 Discuss any data trends related to administrative costs. Describe and explain changes (+ or -) greater than two percent.		AD_44	
AD.Mod_1.2. Implementation update			
1.2.1 Highlight significant demonstration operations or policy considerations that could positively or negatively impact beneficiary enrollment, compliance with requirements, access to services, timely provision of services, budget neutrality, or any other provision that has potential for beneficiary impacts. Also note any activity that may accelerate or create delays or impediments in achieving the demonstration's approved goals or objectives, if not already reported elsewhere in this document. See Monitoring Report Instructions for more detail.			

Prompt		State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
AD.Mod_2. State-specific metrics				
AD.Mod_2.1 Metric trends				
2.1.1	Discuss any data trends related to state-specific metrics. Discuss each state-specific metric trend in a separate row. Describe and explain changes (+ or -) greater than two percent.			

5. Narrative information on other reporting topics

Prompt		State has no update to report (place an X)	State response
1. Budget neutrality			
1.1 Current status and analysis			
1.1.1	Discuss the current status of budget neutrality and provide an analysis of the budget neutrality to date. If the eligibility and coverage policy component is part of a comprehensive demonstration, the state should provide an analysis of the eligibility and coverage policy related budget neutrality and an analysis of budget neutrality as a whole.		
1.2 Implementation update			
1.2.1	Describe any anticipated program changes that may impact financial/budget neutrality.		

Prompt		State has no update to report (place an X)	State response
2. Eligibility and coverage demonstration evaluation update			
2.1 Narrative information			
2.1.1	Provide updates on eligibility and coverage policy evaluation work and timeline. The appropriate content will depend on when this report is due to CMS and the timing for the demonstration. There are specific requirements per 42 Code of Federal Regulations (CFR) § 431.428a(10) for annual [monitoring] reports. See Monitoring Report Instructions for more details.		On April 6, 2021, CMS sent a letter to the state updating the STCs for this demonstration and requesting that the state update the list of provisions, hypotheses, and research questions—and commensurate design elements—to reflect these changes. The State of Wisconsin requested 30-day extension beyond the 60-day timeframe through PMDA to complete the requested revisions to CMS's feedback. CMS approved the State's extension request. The State submitted the requested response memo and revised evaluation design through PMDA on September 20, 2021.
2.1.2	Provide status updates on deliverables related to the demonstration evaluation and indicate whether the expected timelines are being met and/or if there are any real or anticipated barriers in achieving the goals and timeframes agreed to in the STCs.		On April 6, 2021, CMS sent a letter to the state updating the STCs for this demonstration and requesting that the state update the list of provisions, hypotheses, and research questions—and commensurate design elements—to reflect these changes. The State of Wisconsin requested 30-day extension beyond the 60-day timeframe through PMDA to complete the requested revisions to CMS's feedback. CMS approved the State's extension request. The State submitted the requested response memo and revised evaluation design through PMDA on September 20, 2021.
2.1.3	List anticipated evaluation-related deliverables related to this demonstration and their due dates.		

Prompt	State has no update to report (place an X)	State response
3. Other eligibility and coverage demonstration reporting		
3.1 General reporting requirements		
3.1.1 Describe whether the state foresees the need to make future changes to the STCs, implementation plan, or monitoring protocol, based on expected or upcoming implementation changes.		The state of Wisconsin plans on submitting its monitoring protocol once we have an approved implementation plan.
3.1.2 Compared to the details outlined in the STCs and the monitoring protocol, describe whether the state has formally requested any changes or whether the state expects to formally request any changes to: 3.1.2.a The schedule for completing and submitting monitoring reports		The state of Wisconsin plans to continue submitting the metrics that pertain to any demonstration as scheduled.
3.1.2.b The content or completeness of submitted monitoring reports and or future monitoring reports		
3.1.3 Describe whether the state has identified any real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation.		
3.1.4 Provide updates on the results of beneficiary satisfaction surveys, if conducted during the reporting year, including updates on grievances and appeals from beneficiaries, per 42 CFR 431.428(a)5		

Prompt		State has no update to report (place an X)	State response
3.2 Post-award public forum			
3.2.1	If applicable within the timing of the demonstration, provide a summary of the annual post-award public forum held indicating any resulting action items or issues. A summary of the post-award public forum should be included here for the period during which the forum was held and in the annual monitoring report.		

Prompt	State has no update to report (place an X)	State response
4. Notable state achievements and/or innovations		
4.1 Narrative information		
4.1.1 Provide any relevant summary of achievements and/or innovations in demonstration enrollment, benefits, operations, and policies (1) pursuant to the eligibility and coverage policy hypotheses (or if broader demonstration, then eligibility and coverage policy related) or (2) that served to provide better care for individuals, better health for populations, and/or reduce per capita cost. Achievements should focus on significant impacts to beneficiary outcomes. Whenever possible, the summary should describe the achievement or innovation in quantifiable terms (e.g., number of impacted beneficiaries).		

*The state should remove all example text from the table prior to submission.

Note: States must prominently display the following notice on any display of measure rates based on NCQA technical specifications for 1115 eligibility and coverage demonstration monitoring metrics:

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it is audited and designated reportable by an NCQA-Certified HEDIS Compliance Auditor. Until such time, such measure rates shall be designated or referred to as “Adjusted, Uncertified, Unaudited HEDIS rates.”

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