



Date: May 31, 2024
Amended June 3, 2024

DMS Operations Memo 24-09

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

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Division of Medicaid Services

Changes to Medicaid Purchase Plan Premium Policies

CROSS REFERENCE

- Process Help, [COVID-19 Information](#)
- Process Help, [25 Medicaid Purchase Plan \(MAPP\) Processing and Premiums](#)
- Medicaid Eligibility Handbook, [Section 26.5 MAPP Premiums](#)
- Operations Memo, [20-12, "Changes to the Medicaid Purchase Plan"](#)
- Operations Memo, [23-35 "Reinstatement of Medicaid Purchase Plan Policies"](#)
- [Wisconsin Medicaid Purchase Plan \(MAPP\) Consumer Guide](#)

EFFECTIVE DATE

August 1, 2024

PURPOSE

This memo announces the reinstatement of premiums for Medicaid Purchase Plan (MAPP) members, which were temporarily suspended during the federal public health emergency (PHE) related to COVID-19.

The information about premiums in this memo supersedes Operations Memo [23-35, "Reinstatement of Medicaid Purchase Plan Policies."](#)

BACKGROUND

The Secretary of the Department of Health and Human Services declared a federal public health emergency on January 31, 2020, related to COVID-19. Based on related changes in federal and state law, Wisconsin implemented temporary program policies and processes to protect the health and safety of applicants and members during the PHE. These policies included the temporary suspension of MAPP premiums and a delay in the implementation of new policies related to MAPP premiums.

On December 29, 2022, Congress passed the Fiscal Year 2023 Consolidated Appropriations Act (CAA, 2023), which ended some temporary policies that were in place during the PHE. Under this law, states needed to reinstate certain health care policies as of April 1, 2023. However, as a condition of enhanced federal funding, states were not able to implement more restrictive policies or increase premium amounts for a given population from those in effect as of January 1, 2020, until on or after January 1, 2024.

Under the provisions of CAA 2023, MAPP premiums will be reinstated for both new applicants and existing members starting August 1, 2024.

POLICY

PREMIUM-RELATED POLICY CHANGES

Due to a change in state law under Wisconsin 2017 Act 59, MAPP premium policies were changed in August 2020, as announced in [Operations Memo 20-12, Changes to the Medicaid Purchase Plan](#). These policy changes, which are briefly summarized below, were implemented in 2020 while premiums were suspended. They will be in effect when premiums are reinstated starting in August 2024. Because these changes occurred when MAPP premiums were suspended, members who never had to pay a premium in the past may now have to pay a premium, and members who paid a premium before the COVID-19 pandemic may need to pay a different premium amount.

As a reminder, the following premium policy changes were made in 2020:

- MAPP members with gross monthly income above 100% of the federal poverty level (FPL) are subject to premiums.
- MAPP members who owe premiums have a minimum premium amount of \$25.
- Premium amounts for members with income above 100% of the FPL are based on a new premium calculation. For most members who had premiums before the policy changes, this will result in lower premiums.
- MAPP members can request a temporary premium waiver due to hardship for up to 12 months for a given hardship reason.

In 2020, changes were also made to impose a three-month restrictive re-enrollment period (RRP) for non-payment of premium. However, based on direction from the Centers for Medicare & Medicaid Services (CMS), there will no longer be an RRP for MAPP when premiums are reinstated in August 2024.

REINSTATEMENT OF MAPP PREMIUMS

Effective August 1, 2024, MAPP premiums will be reinstated for both existing members and new applicants. MAPP members with gross monthly income over 100% of the FPL will be charged a premium.

Applicants requesting MAPP with a filing date on or after August 1, 2024, will be subject to premium policies. Applicants with gross monthly income over 100% of the FPL must pay an initial premium to become eligible for MAPP.

Example 1: Jane applied for MAPP on August 15, 2024. She was determined eligible for MAPP effective August 1, 2024, with a monthly premium of \$41. Jane must pay her August premium to open for MAPP.

Example 2: James applied for MAPP on July 6, 2024. He was determined eligible for MAPP effective July 1, 2024, with a monthly premium of \$36. James is not subject to a MAPP premium for July, as MAPP premiums were not yet in effect. James receives a notice and premium statement in the mail in mid-July for his first premium due on August 10, 2024. If James does not pay his August premium, his MAPP eligibility will end August 31, 2024.

Example 3: Jessie applied for MAPP on August 5, 2024, with a two-month backdate request. She was determined eligible for MAPP effective June 1, 2024, with a monthly premium of \$25. Jessie does not owe a premium for June or July 2024, as MAPP premiums were not yet in effect. However, Jessie must pay the August premium to open for MAPP benefits for the month of August and ongoing. If Jessie's August premium is not paid, she will be determined ineligible for MAPP for August and ongoing, but she will be eligible for MAPP without a premium from June 1, 2024, to July 31, 2024.

Example 4: Vang applied for MAPP on October 8, 2024, with a two-month backdate request. He was determined eligible for MAPP effective August 1, 2024, with a monthly premium of \$39. Because MAPP premiums have been reinstated as of August 2024, Vang must pay his monthly premium for August, September, and October to open for MAPP as of August 1, 2024. If Vang is unable to pay the premiums for all three benefit months at application, he can gain eligibility as of September 1, 2024, by paying the September and October premiums, or as of October 1, 2024, by paying the October premium only.

Existing MAPP members with gross monthly income over 100% of the FPL will receive a notice and premium statement in July 2024 to notify them of their first premium due August 10, 2024.

Example 5: Brian has been open for MAPP since May 2024 and his gross monthly income is over 100% of the FPL. In early July, Brian is notified that he will owe a monthly premium of \$95 starting in August 2024. Brian receives a premium statement in mid-July showing that his first premium is due August 10, 2024.

Example 6: Mary has been open for MAPP since July 2023 and her gross monthly income is over 100% of the FPL. Mary submits a timely renewal on June 10, 2024. Mary is determined eligible for MAPP with a new certification period starting in July 2024. In early July, Mary is notified that she will owe a monthly premium of \$32 starting in August 2024. Mary receives a premium statement in mid-July showing that her first premium is due August 10, 2024.

NON-PAYMENT OF PREMIUM

Payment of a premium is a condition of eligibility for MAPP. If a premium payment is not made, a notice will be sent at adverse action and MAPP will close for non-payment of a premium at the end of the unpaid premium month. While MAPP members can lose coverage for non-payment of a premium, they will no longer be subject to a restrictive re-enrollment period (RRP). A member whose MAPP eligibility closes due to non-payment of a premium can re-request MAPP. They do not have to pay the unpaid premium in order to reopen MAPP after the closure. However, they must pay any premiums owed for the month(s) in which MAPP reopens.

Example 7: Imani has been open for MAPP since January 2024 and her gross monthly income is over 100% of the FPL. In early July 2024, Imani is notified that she will owe a monthly premium of \$30 starting August 2024. Imani receives a premium statement in mid-July for her premium due August 10, 2024. Imani does not pay her premium payment by August 31, 2024, so her MAPP eligibility closes effective September 1, 2024. Imani re-requests MAPP on September 5, 2024. Because there is no longer a MAPP RRP and Imani is re-requesting MAPP after the unpaid premium month has passed, she does not need to pay the August premium to regain eligibility. She only needs to pay an initial premium to gain eligibility for September. Imani pays the initial premium on September 6 and opens for MAPP as of September 1, 2024. Imani will receive a premium statement in mid-September for her premium due October 10.

LATE PAYMENT

If a late payment is received and processed after the 10th of the month but before the end of the month, MAPP will be reinstated, and a premium statement will be sent for the following month's premium.

Example 8: Donald has been open for MAPP since March 2023 and his gross monthly income is over 100% of the FPL. In early July 2024, Donald is notified that he will owe a monthly premium of \$56 starting August 2024. Donald receives a premium statement in mid-July for his premium due August 10, 2024. Donald does not pay his premium by the due date. On August adverse action, Donald's MAPP eligibility closes for non-payment of premium effective September 1, 2024. If Donald pays his premium and it is processed before August 31, he will remain open for MAPP.

Payments received and processed in the month after the premium was due and eligibility ended will be applied to the current month to allow the member to regain MAPP eligibility, as long as the payment covers the current month's premium in full.

Example 9: Miles has been open for MAPP since June 2024 and his gross monthly income is over 100% of the FPL. In early July, Miles is notified that he will owe a monthly premium of \$60 starting August 2024. He receives a premium statement in mid-July for his premium due August 10, 2024. Miles does not pay his premium by the due date. On August adverse action, MAPP eligibility closes for non-payment of premium effective September 1, 2024. A check for \$60 is received on September 5, 2024. This payment should be treated as a re-request for MAPP. Miles re-opens for MAPP effective September 1, 2024, and the \$60 payment is applied to his September premium.

Payments received more than a calendar month after the premium was due and eligibility ended will be refunded, unless the member has reapplied for or re-requested MAPP (if other health care benefits are open on the case) and the agency pended for the premium.

Example 10: Diego has been open for MAPP since August 2024. Diego's gross monthly income is over 100% of the FPL, and he owes a monthly premium of \$80. Diego did not pay his September premium by the due date. On September adverse action, MAPP eligibility closes for non-payment of premium effective October 1, 2024. A check for \$80 is received by the fiscal agent on November 15, 2024, and it is refunded. There are no health care benefits open on Diego's case, so he needs to reapply for MAPP.

Example 11: Carol has been open for MAPP since September 2024. Carol's gross monthly income is over 100% of the FPL and she owes a monthly premium of \$55. Carol did not pay her October premium by the due date. On October adverse action, MAPP eligibility closes for non-payment of premium effective November 1, 2024. On December 5, 2024, Carol reapplies for MAPP. The IM consortium pends for her \$55 December premium, which needs to be sent to the IM consortium. However, Carol mails her payment to the fiscal agent instead. The fiscal agent gets the payment on December 12, and sees that Carol has re-applied for MAPP and needs to pay her premium, so they notify IM of the payment via the late payment file. The IM consortium applies the payment and reopens Carol's MAPP effective December 1, 2024.

PARTIAL PAYMENT

Unless a temporary premium waiver is in place, members with income over 100% of the FPL must pay their entire MAPP premium by the end of each month to maintain eligibility.

Partial payments made and processed before the last day of the month will be applied to the benefit month. If the remaining balance is not received and processed before the end of the benefit month, the MAPP member will lose eligibility due to non-payment of premium.

Example 12: Judy was notified in July that she will owe a monthly premium of \$51 starting August 2024. She receives a premium statement in mid-July, and her first premium is due August 10, 2024. Judy mails a check on August 1, 2024, for a partial payment of \$25. On August adverse action, MAPP eligibility closes for non-payment of premium effective September 1, 2024. If she does not pay the remaining \$26 before the end of the month, her MAPP eligibility will end August 31, 2024.

ELECTRONIC PREMIUM PAYMENT OPTIONS

Previously, members paid premiums by check or money order, or through electronic funds transfer (EFT) or wage withholding. Members will now be able to pay ongoing premiums using a credit card, debit card, or EFT from a checking or savings account using the ACCESS website or MyACCESS

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mobile app. Members will also be able to view their premium information and payment history through ACCESS and MyACCESS.

Initial premium payments required to gain MAPP eligibility must still be paid by check or money order and are collected by the income maintenance agency.

CONTACTS

DHS CARES Problem Resolution Team

DHS/DMS/BEEP/BS

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