



Date: October 4, 2024
Amended October 11, 2024

DMS Operations Memo 24-21

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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Changes to Support Individual-Level Health Care Eligibility Determinations

CROSS REFERENCE

- BadgerCare Plus Eligibility Handbook, [Section 1.2 Continuous Coverage for Qualifying Children](#), [Chapter 2 BadgerCare Plus Group](#), and [Section 26.1 Renewals](#)
- Medicaid Eligibility Handbook, [Section 1.2 Continuous Coverage for Qualifying Children](#) and [Section 3.1 Renewals](#)
- Operations Memo, [23-44, “12-Month Continuous Health Care Coverage for Children”](#)

EFFECTIVE DATE

October 21, 2024

PURPOSE

This memo announces updated eligibility policies that ensure individuals get accurate, individual-level health care eligibility determinations and coverage periods.

BACKGROUND

Per federal requirements, eligibility for health care must be determined and redetermined at the individual rather than household level, including at administrative renewal.

Federal regulations also require that health care eligibility be promptly redetermined between regular renewals whenever information is received about a change in a member's circumstances that may affect their eligibility. Requests for information or verification must be limited to information related to the change. If the agency has enough information to determine eligibility following the change, a new 12-month certification period may begin.

Under provisions of the Consolidated Appropriations Act, 2023, and as announced in [Operations Memo 23-44, "12-Month Continuous Health Care Coverage for Children,"](#) children under age 19 enrolled in certain health care programs get 12 months of continuous coverage. During their 12-month continuous coverage period, they cannot be charged a new or increased premium, transition from a Medicaid-funded to a Children's Health Insurance Program (CHIP)-funded health care category or be disenrolled, with some limited exceptions.

An assistance group is a concept used in the CARES eligibility system to group individuals when determining eligibility. During the eligibility determination process, individuals are placed into assistance groups based on factors such as age, family relationships, and tax filing relationships. Each assistance group has at least one potentially eligible member, and some include multiple individuals. A given individual may be designated as a person who is counted in the group and whose income and assets, if applicable, may be counted when determining financial eligibility. Some individuals are excluded and not considered at all.

POLICY

INDIVIDUAL-LEVEL ELIGIBILITY

Effective with eligibility determinations made on or after October 21, 2024, most individuals will now be in their own assistance group. This will remove some eligibility dependencies that currently exist between members who are part of the same assistance group and ensure that eligibility rules and administrative renewals can be applied accurately at the individual level. There is no change to determining group size or how income is counted.

Individuals will have their own separate assistance group for the following BadgerCare Plus and Medicare Savings Program coverage groups:

- BadgerCare Plus children younger than 19 years old
- BadgerCare Plus parents and caretakers of children younger than 18 years old or dependent 18-year-olds
- BadgerCare Plus parents and caretaker relatives whose children have been removed from the home and placed in out-of-home care
- BadgerCare Plus adults ages 19 through 64 who are not receiving Medicare, except Medicare Part B Immunosuppressive Drug Benefit (Part B-ID), and do not have dependent children who reside with them at least 40% of the time (also known as childless adults)
- Qualified Medicare Beneficiary (QMB)
- Specified Low-Income Medicare Beneficiary (SLMB)
- Specified Low-Income Medicare Beneficiary Plus (SLMB+)
- Qualified Disabled Working Individual (QDWI)

The following coverage groups already have one-person assistance groups, and so they are not impacted by this change:

- BadgerCare Plus Extensions
- BadgerCare Plus Deductibles
- BadgerCare Plus for pregnant individuals
- Continuously Eligible Newborns (CENs)
- Former Foster Care Youth (FFCY)
- Medicaid Purchase Plan (MAPP)
- Institutional Medicaid
- Waiver Medicaid
- Family Planning Only Services

There will not be one-person assistance groups for Supplemental Security Income (SSI)-Related Medicaid, including Medicaid Deductibles, Special Status Medicaid, and medically and categorically needy SSI-Related Medicaid at this time.

There is also no impact to Katie Beckett Medicaid, Wisconsin Well Woman Medicaid (WWWMA), or SeniorCare.

Example 1: Gary, Anna, and their three children, Emma, Charlotte, and Liam are enrolled in BadgerCare Plus. Before October 21, 2024, when eligibility is determined, Gary and Anna would be enrolled in a BadgerCare Plus parent assistance group together, while Emma, Charlotte, and Liam would be enrolled in a BadgerCare Plus children assistance together for a total of two assistance groups. If their eligibility is redetermined on or after October 21, 2024, Gary and Anna will each be in their own BadgerCare Plus parent assistance group, and Emma, Charlotte, and Liam would each be in their own BadgerCare Plus children assistance group, for a total of five individual assistance groups, this will ensure that eligibility changes and administrative renewals can be applied individually to Gary, Anna, Emma, Charlotte and Liam.

ELIGIBILITY REDETERMINATIONS

When an individual opens for a new health care certification period on a case, new 12-month certification periods will be established for other eligible health care members on the case, with some exceptions.

New certification periods will be established for existing eligible members when an individual opens following a change in circumstances, person add, new program request, or renewal. For example, new certification periods for other eligible members can be established when a person joins the household and opens for health care, when they change health care categories, or when a previously ineligible person becomes eligible due to a change (for example, a reduction in income puts them under the program limit).

New certification periods will not be established for an existing member when:

- A newly added person is found ineligible
- A new assistance group is pending
- The existing member is open for time-limited benefits
- The existing member is a child who is in their 12-month continuous coverage period and the change would result in a negative action or would move the child from Medicaid to CHIP
- The existing member is ineligible based on the change in circumstances

Example 2: Margaret and Phillip are enrolled in BadgerCare Plus as childless adults with a certification period of January 1, 2025, through December 31, 2025. On July 2, 2025, 11-year-old William joins the household and requests health care. William does not have continuous coverage from another case. William is enrolled in BadgerCare Plus with continuous coverage from July 1, 2025, through July 31, 2026. Margaret and Phillip are now eligible for BadgerCare Plus as parents and will also start a new certification period from August 1, 2025, through July 31, 2026.

Example 3: Diego, Sofia, and their 4-year-old daughter Gabriella are enrolled in BadgerCare Plus from February 1, 2025, through January 31, 2026. On August 8, 2025, Diego's 12-year-old daughter Isabella joins the household and requests health care. Isabella has had BadgerCare Plus on another case since January. Her BadgerCare Plus is closed on the other case, she is determined eligible on Diego's case with a new continuous coverage period, and is enrolled in BadgerCare Plus from September 1, 2025, through August 31, 2026. Diego, Sofia, and Gabriella remain eligible for BadgerCare Plus and start a new certification period from September 1, 2025, through August 31, 2026.

Example 4: Bill and Carrie are enrolled in BadgerCare Plus as parents and their 12-year-old daughter Kiley is disabled and enrolled in SSI-Related Medicaid. Their certification period is January 1, 2025, through December 31, 2025. Kiley is determined to no longer be disabled on June 5, 2025. There was no other change. Kiley transitions from SSI-Related Medicaid to BadgerCare Plus with a new certification period of July 1, 2025, through June 30, 2026. A new 12-month certification period is established for Bill and Carrie from July 1, 2025, through June 30, 2026.

Example 5: Edith is enrolled in SSI-Related Medicaid from January 1, 2025, through December 31, 2025. In July, Edith gets married and requests health care for her husband, Chester. Chester is eligible and enrolled in SSI-Related Medicaid from July 1, 2025, through July 31, 2026. Edith continues to be eligible with a new certification period from August 1, 2025, through July 31, 2026.

Example 6: Dimitri is enrolled in BadgerCare Plus as a childless adult from July 1, 2024, through June 30, 2025. In October, Dimitri gets married and requests health care for his wife, Polina. Polina is not a US citizen or qualifying immigrant and is found ineligible. Dimitri's BadgerCare Plus certification period does not change.

TIME-LIMITED BENEFITS

When an individual opens for a new health care certification period on a case, new certification periods will not be established for other members enrolled in time-limited health care benefits. These include:

- Pregnant and postpartum individuals enrolled in BadgerCare Plus
- Continuously Eligible Newborns
- People in a four or twelve-month BadgerCare Plus Extension
- People who need to meet or have met a deductible to enroll in BadgerCare Plus or Medicaid

Example 7: Matthew and his child Lee are enrolled in BadgerCare Plus from January 1, 2025, through December 31, 2025. Lilly, Lee's mother, is enrolled in BadgerCare Plus as a pregnant individual with a renewal date of September 30, 2025. In May, their other child Silas joins the household. Lilly remains pregnant. Silas is enrolled in BadgerCare Plus from May 1, 2025, through ~~April 30~~ **May 31**, 2026. A new 12-month certification period is established for Matthew and Lee from ~~May~~ **June** 1, 2025, through ~~April 30~~ **May 31**, 2026. Lilly's certification period does not change.

However, a new time-limited health care benefit will result in other members getting a new 12-month certification period.

Example 8: Deepak, Fatima, and their son Ravi are enrolled in BadgerCare Plus from July 1, 2025, through June 30, 2026. In August 2025, Fatima's pregnancy is reported, and she moves from BadgerCare Plus as a parent to BadgerCare Plus as a pregnant individual through May 31, 2026. There are no other changes, and Deepak and Ravi remain eligible. A new 12-month certification period is established for Deepak and Ravi from September 1, 2025, through August 31, 2026.

CHILDREN IN CONTINUOUS COVERAGE PERIODS

If a child would be negatively impacted or move to a CHIP-funded category of health care because of a change, person-add, or new program request during their 12-month continuous coverage period, the child will not get a new 12-month certification period. They will remain in their current period. However, other household members can get new 12-month certification periods. This may result in different household members having different health care renewal dates.

Example 9: Mary's 10-year-old son Tom is enrolled in BadgerCare Plus from July 1, 2024, through June 30, 2025. Tom has a \$10 premium because Mary's income is at 210% FPL. On December 4, 2024, Tom moves to his father Jack's household. Jack requests health care for himself and Tom. Jack is denied due to excess income. Tom would also be ineligible due to income over 306% FPL but will be enrolled in BadgerCare Plus at 210% FPL for the remainder of his continuous coverage period, through June 30, 2025.

Example 10: LaTanya's 11-year-old son Tucker is enrolled in BadgerCare Plus with a \$30 premium from January 1, 2025, through December 31, 2025. On February 7, 2025, LaTanya's 8-year-old son Trey joined the household and requested health care. Trey has continuous coverage under BadgerCare Plus without a premium from his father's case through June 30, 2025. Trey is determined eligible on LaTanya's case but would have a \$10 premium. Trey will be enrolled in BadgerCare Plus without a premium for the remainder of his continuous coverage period, through June 30, 2025. Tucker's premium reduces from \$30 to \$10 because of the change in household size, and he gets a new 12-month certification period from March 1, 2025, through February 28, 2026. While Trey has a renewal date of June 30, 2025, Tucker has a renewal date of February 28, 2026. If a renewal is completed for Trey in June 2025, and Trey and Tucker are both determined eligible without adverse impact, their certification periods may align at that time.

OTHER HEALTH CARE PROGRAMS

If an individual opens for a new certification period for Wisconsin Well Woman Medicaid, Katie Beckett Medicaid, the SeniorCare Prescription Drug Program, or benefits administered outside of the CARES eligibility system, new 12-month certification periods will not be established for existing members on the case.

CONTACTS

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