



Date: February 07, 2025

DMS Operations Memo 25-04

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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Enhancements to Health Care Administrative Renewals

CROSS REFERENCE

- BadgerCare Plus Handbook, [Section 9.12 Reasonable Compatibility for Health Care](#) and [Chapter 26 Renewal](#)
- Medicaid Eligibility Handbook, [Chapter 3 Renewals](#)
- [Operations Memos, 23-40 Changes to Health Care Administrative Renewal](#) and [24-21 Changes to Support Individual-Level Health Care Eligibility Determinations](#)

EFFECTIVE DATE

February 22, 2025

PURPOSE

This operations memo announces changes to health care administrative renewals to comply with federal requirements.

BACKGROUND

Provisions in the Patient Protection and Affordable Care Act of 2010 (PPACA or ACA) require states to rely on electronic data sources to verify or validate information on file for health care members whenever possible. Federal regulations restrict states from requesting information from health care members during an annual renewal unless the information cannot be obtained through an electronic data source or the information from the data source is not reasonably compatible with the information on file.

As part of this expectation, states are required to try to use electronic data sources to renew members' eligibility on an annual basis. This process is often described at the federal level as an ex parte renewal, but in Wisconsin it's called an administrative renewal. If this type of automated renewal cannot be completed, only then may states ask members to complete a renewal online, by phone, in person or by mail.

Wisconsin has been conducting administrative renewals since 2017, and like many other states, sought to renew eligibility for the entire household as part of the administrative renewal process. If eligibility could be automatically extended using data sources for everyone in the household, then an administrative renewal was completed. The household was sent a letter to notify them that their health care was renewed, with a summary of information used to renew their eligibility, and they are asked to report any corrections. If one or more household members could not be administratively renewed, then the household was sent a renewal letter with a pre-printed renewal form (PPRF) and asked to complete a regular renewal online, by phone, in person or by mail.

In August 2023, the Centers for Medicare and Medicaid Services (CMS) issued formal guidance requiring that states complete administrative renewals at an individual level rather than a household level. This means that if any one member can have their eligibility automatically extended using information from data sources, states must complete an administrative renewal for that individual. The rest of the household may then need to complete a regular renewal. Since August 2023, the Wisconsin Department of Health Services (DHS) has implemented several changes to comply with this federal guidance.

POLICY

At each household's annual renewal, DHS attempts to complete administrative renewals for household members at the individual level. An individual member can be administratively renewed for a health care program if all the information necessary to determine that individual's eligibility is on file or can be verified through a data exchange. For members open for multiple health care program, one or more programs can be administratively renewed even if another program cannot be. In addition, some members in the household may have their health care administratively renewed while other members in the household must complete a regular renewal. Effective February 22, 2025, this process will be fully automated. In addition, renewal correspondence will be modified to comply with federal requirements to make clear which members of the household could and could not be administratively renewed and which members of the household need to complete a renewal.

Administrative renewal letters will be sent to households where at least one member is successfully administratively renewed. The letter will list the name of each member that was administratively renewed and the program name. This letter will include the case information used to complete the administrative renewal and instructions to report any changes within 30 days. The letter will also list any members of the household that will need to complete a regular renewal and inform them that they will receive another letter with further instructions.

Renewal letters will be sent to households approximately 45 days prior to the renewal date when at least one member must complete a regular renewal to continue receiving benefits. The letter will list the names of any household members who will need to complete the regular renewal and the program name. It will continue to include the PPRF with the case information on file for the member to update as applicable.

CONTACTS

DHS CARES Problem Resolution Team

DHS/DMS/BEEP/RW/BS

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