

**Gap Filling**  
**IMAC Presentation**  
*January 2023*

# Overview

Due to differences between the eligibility rules used by the Federally Facilitated Marketplace (FFM) and the eligibility rules used when counting income for BadgerCare Plus, someone could fail to qualify:

- For advanced premium tax credits at the FFM because they are below 100% of the federal poverty level (FPL) based on their annual income; and
- For BadgerCare Plus because they are above 100% of the FPL based on their current monthly income.

If people were left in this eligibility "gap," their only option is to pay for the full cost of private health insurance through the FFM.

To prevent this from happening, these people must have eligibility for BadgerCare Plus determined based on their expected annual income under a process called "gap filling."

# Current Process

Under the current process, if a person has a gap filling referral or has requested health care and been found ineligible for BadgerCare Plus solely due to excess monthly income:

- IM workers must check the person's eligibility under gap filling rules.
- Then the worker reports the result to their CARES coordinator who emails EM CAPO.
- Finally, someone from EM CAPO team manually certifies eligibility for BadgerCare Plus and sends a NOD informing the person of their eligibility.

## February 2023 Enhancements

On February 25, 2023, CARES will be enhanced to automate gap filling eligibility determinations. There will be changes to CWW, correspondence, and ACCESS.

Benefits from this enhancement include reducing workload for IM workers and EM CAPO workers and improving the member experience for applicants and members by providing a seamless referral between the FFM and the State of Wisconsin when being transferred.

# Cares Worker Web (CWW) Enhancements

CWW will be updated in many ways to collect information on the applicant's or members annual income and incorporate the information into eligibility processes.

However, the two key enhancements involve the new Expected Annual Income page and the MAGI Budget page.

**Note:** Verification of expected annual income is not required (in fact, it may be impossible to know if the person hasn't received the income yet).

But workers do need to consider the information from the applicant or member, data sources, and/or past income on file to validate the expected annual income.

# New Expected Annual Income Page

The Expected Annual Income page is scheduled when:

- A MAGS, MAGA, or MAGN fails only for excess monthly income; and
- The individual's self-attested income on the Individual Reported Annual Income page is under the limit.

And alert 602 "Potentially Eligible for Gap. Complete expected Annual Income page" is created.

# New Expected Annual Income Page

The new Expected Annual Income page will display the income details from the case drawn from the completed detail pages. It has five main sections:

- Annual Income Details
- Earned Income
- Self-Employment Income
- Unearned income
- Deduction

Within each section, a page displays up to 10 records for workers to review.

Note that the information displayed is the most recent information provided to the worker.

# New Expected Annual Income Page

Workers can do the following on this page:

- Enter and validate counted income. Workers must validate information **within each section** of the page for that income to count in the eligibility determination. They enter that amount in the field at the top of each section.
- Request information regarding expected annual income from the individual by checking the “Is additional income information needed from the individual” status at the top of the page. When the worker does request additional income information, they must also add comments and specific details to the Verification Checklist.
- Close or deny BadgerCare Plus eligibility if the individual does not provide the requested information.



# New Expected Annual Income Page - Blank

**Expected Annual Income** Cancel Reset

**Individuals**

PP - 2023

**Annual Income Details**

Effective Period

Income Year: 2023 Last Updated: 01/13/2023

Delete Reason: [ ] Last Updated By: CARES (New Record)

**Details**

Individual: PP Go to Employment Query

Individual Reported Annual Income: \$9000.00

Employment Earned Income: \$ 0.00

Self-Employment Profit (or Loss): + 0.00

Unearned Income: + 0.00

Deduction: - 0.00

Final Calculated Annual Income: \$ 0.00

Override Final Calculated Annual Income:  \$ [ ] . [ ]

Is additional income information needed from the individual?: [W - Waiting worker validation]

Comments: [ ]

Current Size = 0 characters (240 characters max.)

**Earned Income** Expand All Collapse All

Annual Earned Income Amount: \$ [ 0 ] . [ 00 ]

Comments: [ I ]

Current Size = 0 characters (240 characters max.)

**Individual Reported Employment Income Details**

Details Seq	Begin Month	End Month	Employer Name	Employer FEIN	Monthly/Override BC+ Taxable Amount	Number of Months Counted	Expected Annual Income
1	01/2023		COMPANY		\$4,000.00	12	\$48,000.00

**In-Kind Income Details**

Details Seq	Begin Month	End Month	Person/Organization Name	Monthly In-Kind Amount	Number of Months Counted	Expected Annual Income
No data found.						

**Data Exchange Employment Income Details**

Employer Number	Employer Name	Quarter	Wage	Source
No data found.				

# New Expected Annual Income Page – Worker Validated

**Effective Period**

\* Income Year: **2023** Last Updated: 01/13/2023  
 Delete Reason:  Last Updated By: CARES (New Record)

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**Details**

\* Individual:  23M PP [Go to Employment Query](#)  
 Individual Reported Annual Income: **\$9000.00**

Employment Earned Income:	<b>\$ 48000.00</b>
Self-Employment Profit (or Loss): +	0.00
Unearned Income: +	0.00
Deduction: -	0.00
<b>Final Calculated Annual Income:</b>	<b>\$ 48000.00</b>

Override Final Calculated Annual Income:  \$  .

\* Is additional income information needed from the individual?:

Comments:

Current Size = 0 characters (240 characters max.)

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**Earned Income** [Expand All](#) [Collapse All](#)

Annual Earned Income Amount: \$  .

Comments:

Current Size = 0 characters (240 characters max.)

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**Individual Reported Employment Income Details**

Details Seq	Begin Month	End Month	Employer Name	Employer FEIN	Monthly/Override BC+ Taxable Amount	Number of Months Counted	Expected Annual Income
1	01/2023		COMPANY		\$4,000.00	12	\$48,000.00

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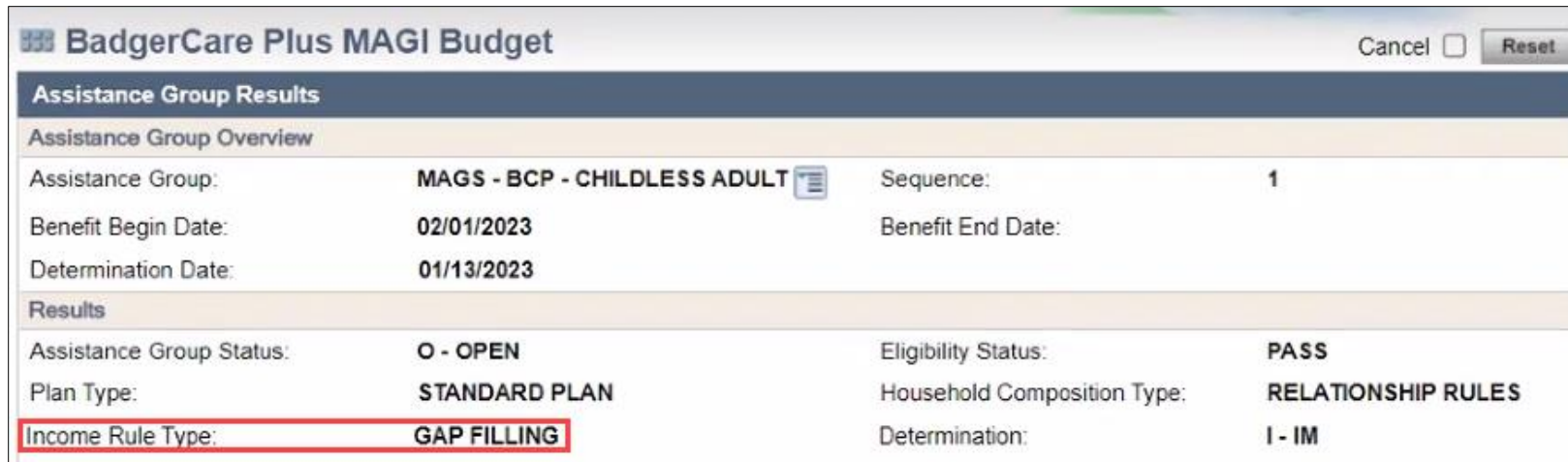
**In-Kind Income Details**

Details Seq	Begin Month	End Month	Person/Organization Name	Monthly In-Kind Amount	Number of Months Counted	Expected Annual Income
No data found.						

# Updated BadgerCare Plus MAGI Budget Page

The BadgerCare Plus MAGI Budget page will be updated to account for annual income as well as monthly income.

In the Assistance Group Results section, a new field titled “Income Rule Type” will indicate what income test is used to determine eligibility.



The screenshot displays the 'BadgerCare Plus MAGI Budget' application window. It features a title bar with 'BadgerCare Plus MAGI Budget' and 'Cancel' and 'Reset' buttons. The main content is divided into sections: 'Assistance Group Results', 'Assistance Group Overview', and 'Results'. The 'Assistance Group Overview' section includes fields for Assistance Group (MAGS - BCP - CHILDLESS ADULT), Sequence (1), Benefit Begin Date (02/01/2023), and Determination Date (01/13/2023). The 'Results' section includes Assistance Group Status (O - OPEN), Eligibility Status (PASS), Plan Type (STANDARD PLAN), Household Composition Type (RELATIONSHIP RULES), and Determination (I - IM). The 'Income Rule Type' field is highlighted with a red border and contains the value 'GAP FILLING'.

Assistance Group Results			
<b>Assistance Group Overview</b>			
Assistance Group:	MAGS - BCP - CHILDLESS ADULT	Sequence:	1
Benefit Begin Date:	02/01/2023	Benefit End Date:	
Determination Date:	01/13/2023		
<b>Results</b>			
Assistance Group Status:	O - OPEN	Eligibility Status:	PASS
Plan Type:	STANDARD PLAN	Household Composition Type:	RELATIONSHIP RULES
Income Rule Type:	GAP FILLING	Determination:	I - IM

# Updated BadgerCare Plus MAGI Budget Page

In the “MAGI Group Income” section, there is a list of the income for each individual in the AG. The MAGI Group Income – Annual subsection will be displayed when BC+ fails the monthly income limit for the following AG types – MAGA, MAGN, or MAGS.

Note that this income is drawn from the Expected Annual Income page.

MAGI Group Income - Monthly	
Group 1 ( [ ] PP )	
Employment Earned Income:	\$ 4,000.00
Self-Employment Profit (or Loss): +	0.00
Unearned Income (or Loss): +	0.00
Deduction: -	0.00
Countable Income:	\$ 4,000.00

MAGI Group Income - Annual	
Group 1 ( [ ] PP )	
Override Annual Income:	\$ 9,000.00
Employment Earned Income: +	0.00
Self-Employment Profit (or Loss): +	0.00
Unearned Income (or Loss): +	0.00
Deduction: -	0.00
Countable Income:	\$ 9,000.00

# Updated BadgerCare Plus MAGI Budget Page




In the “Income Eligibility Determination” section there are two key subsections: Total Countable Income and Income Limits.

If the monthly income test fails, there is a second test for annual income based on the individual’s self-attested income on the Individual Reported Annual Income page.

If the annual income limit test fails, BadgerCare Plus fails, and the Expected Annual Income page does not need to be completed.

However, if the annual income limit test passes, the worker must validate the information on the Expected Annual Income page to determine gap eligibility.

# Updated BadgerCare Plus MAGI Budget Page

Income Eligibility Determination			
Total Countable Income - Monthly			
Group 1 Countable Income:	\$ 4,000.00		
Assistance Group Countable Income:	\$ 4,000.00		
Total Countable Income - Annual			
Group 1 Countable Annual Income:	\$ 9,000.00		
Assistance Group Countable Annual Income:	\$ 9,000.00		
Income Limits			
Countable Income FPL:	353.20%	Gap Filling Annual Income Limit:	\$ 13,590
Countable Annual Income FPL:	66.23%		
Eligibility Test FPL:	100.00%	Income Limit:	\$ 1,132.50 
Premium Requirement Limit FPL:	50.00%	Premium Requirement Income Limit:	\$ 566.25 
AG Premium Results			
Premium Status:	<b>Exempt</b>		

# Updated BadgerCare Plus MAGI Budget Page

The "Individual Income – Annual" section displays the annual income calculation for individuals listed on the case (if there has been an eligibility determination based annual income).

Individual Income - Monthly		Expand All	Collapse All
PP (XA - EXCLUDED ADULT)			
Employment Earned Income:	+	\$ 4,000.00	
Self-Employment Profit (or Loss):	+	0.00	
Unearned Income (or Loss):	+	0.00	
Deduction:	-	0.00	

Individual Income - Annual		Expand All	Collapse All
PP (XA - EXCLUDED ADULT)			
Individual Reported Income:		\$ 22,000.00	
Employment Earned Income:	+	0.00	
Self-Employment Profit (or Loss):	+	0.00	
Unearned Income (or Loss):	+	0.00	
Deduction:	-	0.00	

# Correspondence Updates – VCL and NOD

The Verification Checklist (VCL) and Notice of Decision (NOD) will be updated to refer to gap filling information or determinations.

- The “For Your Information (FYI)” section in the VCL will include a reference to a review of eligibility annual income rules (if applicable). And the “Action Needed” section will include an entry for information sought on annual income for a specific tax year.
- Note that workers will be expected to add details to the VCL that explain what information is needed to verify annual income, so the applicant or member understands what is needed. If workers do not, the VCL default text will be generic, and the person may not understand what they need to provide.
- When the person is denied BadgerCare Plus for excess monthly income, new language in the “Your Health Care Benefits” section of the NOD will state their application has been sent to the FFM. And the “Your Household’s Reported Income” section will refer to annual income as well as monthly income.



## New Correspondence – EAI Letter

A new Expected Annual Income letter will be sent on the first Saturday in January to ask gap-filling eligible members for updated information on their annual income.

It is important for members to reply to the letter and provide the updated information; failure to do so may result in termination of eligibility for health care.

- When members do reply (whether by calling the IM agency, submitting the changes through ACCESS, mailing a reply, or stopping by the agency, the IM workers will follow a process to verify that information.
- When member do not reply, a batch process in early February will identify those persons and terminate their eligibility.

**Note:** The worker process for entering information provided by the reply to the Expected Annual Income letter in CWW will be added to Process Help in advance of the letter being sent in 2024.

# ACCESS Enhancements

The ACCESS Am I Eligible (AIE), Apply for Benefits (AFB), and Renew My Benefits (RMB) modules will be updated to collect information on prospective annual income. This will streamline the process of completing gap filling determinations when needed.

- The AIE “Your household’s monthly income” page will have a new required field titled “How much money will all the people in your household earn from this year?”
- The AFB “Monthly Income” page for each household member will have an optional field titled “What do you expect [Name]’s total gross income will be in [Year]? (optional)” This will collect information on multiple years if the person is requesting backdated months or makes the request at the end of the year.
- A new RMB page titled “Expected Annual Gross Income” will be a part of the questions in the Other Income spoke when the household is renewing health care, and either the primary person or primary person spouse is not EBD. Those non-EBD persons have the option to enter their expected annual gross income for the year.

**Questions?**