



# **Section 1115 Postpartum Coverage Waiver**

**Medicaid Advisory  
Committee (MAC)**

**April 6, 2022**



# Current Medicaid Postpartum Coverage

- Under current law, the income eligibility threshold for pregnant people is 300% of the federal poverty level.
- Eligibility for coverage ends on the last day of the month when the 60-day postpartum period ends.
- Those who qualify for Medicaid based on pregnancy are provided with a wide range of Medicaid benefits, including prenatal care, childbirth, and delivery services.



# Current Medicaid Postpartum Coverage Continued

- Individuals whose household income is below 100% of the FPL may retain eligibility following pregnancy.
- Unless eligible under other Medicaid provisions, individuals whose household incomes are above 100% FPL are no longer eligible for coverage.
- They are dis-enrolled from the program after 60 days.



## 2021 Wisconsin Act 58

- This waiver is prompted by 2021 Wisconsin Act 58.
- Requires DHS to request federal approval to extend postpartum eligibility for Medicaid-eligible pregnant people to continue to the last day of the month after 90 days postpartum.
- The legislation does not impact or modify any components of the state's current Medicaid or CHIP programs.



# Waiver Objectives

- The goals sought by this waiver are to:
  - Reduce the morbidity and mortality of eligible Medicaid members in Wisconsin.
  - Support the long-term fiscal sustainability of the Medicaid program in Wisconsin.



# Waiver Amendment Overview

- This waiver increases the postpartum coverage period from 60 days to 90 days after the last day of pregnancy, providing an additional month of coverage for individuals whose household income is above 100% of the FPL but not exceeding 300% (not including the 5% income disregard).



# Demonstration Population

- The waiver will only be implemented for the following eligibility groups with incomes up to 300% of FPL.

Eligibility Group Name	CFR and Social Security Act Citations
Qualified Pregnant Women and Children	42 CFR § 435.116  SSA § 1902(a)(10)(A)(i)(III) SSA § 1905(n)
Mandatory Poverty Level Pregnant Women	SSA § 1902(a)(10)(A)(i)(IV) SSA § 1902(l)(1)(A)
Optional Poverty Level Related Pregnancy – Women & Infants	SSA § 1902(a)(10)(A)(ii)(IX) SSA § 1902(l)(2)



# Determining Eligibility

- Eligibility for the extended postpartum period is determined by the date on which the pregnancy ends.
- This extension has no material impact on eligibility determinations.
- Individuals who are not enrolled in BadgerCare Plus as a pregnant person are not eligible for this proposed extension.





# Maintaining Eligibility

- Participants who are deemed eligible for postpartum coverage will maintain coverage for the duration of the three-month postpartum period.
- After the three-month postpartum period, an eligibility redetermination will be made.
- If an individual qualifies for full Medicaid benefits as part of a separate eligibility group, the transition will automatically occur.



# Transition Period

- DHS will extend a “transition period” to eligible people whose 60-day postpartum benefits prior to this demonstration would have expired.
- Eligible people will be permitted to seamlessly benefit from the extended postpartum coverage and maintain coverage for the duration of the 90-day period.



# Enrollment Transitions

- Individuals will seamlessly transition into this extended benefit exactly as they did previously under the 60-day postpartum benefit period.
- After the extended three-month postpartum benefit period, all birthing people covered by this proposed extension will transition to the appropriate Medicaid program, if eligible, based on their current eligibility.
- This transition will take place automatically.



# Retroactive Enrollment

- There is no change to the state's current retroactive coverage policy.
- New entrants to the program will have retroactive coverage back to the beginning of the month in which their application was submitted.
- Eligibility will be determined for up to three months prior to the month of application upon the applicant's request.



# Managed Care Delivery System

- The state will utilize a managed care delivery system to provide services to all members eligible for this proposed extension.
- The state does not intend to amend its existing contracts with its HMOs to implement the provisions of this 1115 demonstration waiver.



# Health Plan Selection

- HMO assignment/selection will follow the same process used outside this waiver.
- Members who do not already belong to an HMO upon entry into the program will be automatically enrolled into an HMO.
- Members will then have a 90-day window to switch to a different plan if they choose before being locked into their assigned plan until their anniversary date the following year.



# Payment Rates for Services

- The capitation rate-setting methodology for this demonstration will be the same methodology used to set rates for the current Medicaid populations.
- Payment rates will comply with all federal rate-setting requirements and guidance.



# Implementation

- The state intends to implement the demonstration as soon as possible after CMS approval.
- This rollout must include sufficient time for the state to prepare and implement operational and administrative changes and communicate with members the changes under the waiver.





# Notification

- The state will develop and deploy an appropriate communications strategy to inform current BadgerCare Plus enrollees and members in the “transition period” group.
- Communications will also target HMOs, pertinent organizations, hospitals, providers, and lactation service professionals, through provider-specific messages.
- Additional communications to all pertinent organizations will be conducted via email.



# Budget Neutrality

- Federal policy requires Section 1115 demonstration waivers be budget neutral to the federal government.
- Wisconsin will continue to use a per-member per-month (PMPM) methodology specific to the postpartum coverage population to determine and achieve budget neutrality.
- The demonstration will measure the financial impact to the program.



# Timeline

Major Milestone	Date
Tribal Notice	March 15, 2022
Public Notice & Draft Waiver Application Posted to DHS Website	April 6, 2022
Public Hearings	April 13, 2022 April 20, 2022
Tribal Consultation	May 10, 2022
Public Comment Period	April 6, 2022 – May 6, 2022
Final Waiver Amendment Application Submitted to CMS	May 15, 2022
CMS Approval	TBD
Implementation	As soon as possible after CMS Approval



# Waiver Materials

- Waiver materials, including the full public notice, and comment mechanisms, are available on the DHS website at [www.dhs.wisconsin.gov/dms/postpartum1115waiver.htm](http://www.dhs.wisconsin.gov/dms/postpartum1115waiver.htm).



# Join the Public Hearing

April 13, 2022

10:00 a.m. – 12:00 p.m.

- Join online:
  - <https://dhswi.zoomgov.com/j/1616690151>
  
- Join by phone:
  - Toll-Free: 844-708-2568
  - 1 669 254 5252
  - 1 646 828 7666
  - 1 669 216 1590
  - 1 551 285 1373
  - Webinar ID: 161 669 0151



# Join the Public Hearing

April 20, 2022

10:00 a.m. – 12:00 p.m.

- Join online:
  - <https://dhswi.zoomgov.com/j/1610547719>
  
- Join by phone:
  - Toll-Free: 844-708-2568
  - 1 669 254 5252
  - 1 646 828 7666
  - 1 669 216 1590
  - 1 551 285 1373
  - Webinar ID: 161 054 7719