

# ForwardHealth **UPDATE**

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## **COMPLIANCE GUIDE FOR WISCONSIN CORRECTIONAL FACILITIES SERVING MEDICAID-ENROLLED YOUTHS WHO ARE INCARCERATED**

To address health impacts to young people who are incarcerated, Congress passed a law in 2023 requiring correctional facilities to provide health screenings and case management services to youths who are enrolled in Wisconsin Medicaid. The law requires Medicaid state programs to support correctional facilities if they choose to provide services to youths post-adjudication and 30 days pre-release.

These services are referred to as Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) and targeted case management (TCM). EPSDT is known as HealthCheck in Wisconsin and will be referred to as such in this ForwardHealth Update.

Note: ForwardHealth is the administrative and payor arm of Wisconsin Medicaid.

### **AFFECTED PROGRAMS**

BadgerCare Plus, Medicaid

### **TO**

Correctional Facility, HMOs and Other Managed Care Programs

### **QUICK LINKS**

- [Medical Services for Youths Leaving Public State Prisons or Correctional Facilities topic #23597](#)
- [A Comprehensive Overview topic #1691](#)
- [Provider Identification topic #3421](#)
- [Correctional Facility Providers topic #24283](#)
- [Update 2024-51, "Screenings and Medical Services for Youths Leaving Public State Prisons or Correctional Facilities"](#)
- [Information for Specific Provider Types page](#)

Correctional facilities in Wisconsin will need to take action, and the instructions are in this Update.

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## Overview

Update [2024-51](#), “Screenings and Medical Services for Youths Leaving Public State Prisons or Correctional Facilities,” notified providers that **ForwardHealth would begin covering HealthCheck screenings and TCM services on January 1, 2025.**

Beginning April 1, 2026, correctional facilities and their staff can enroll with Wisconsin Medicaid as providers.

- Correctional facilities enroll as billing providers and submit claims to be reimbursed for HealthCheck and TCM services.
- Correctional facility staff enroll under their specific provider area, such as registered nurses, HealthCheck providers, or TCM providers, and will be listed as rendering providers on claims.

## Compliance Pathways for Correctional Facilities

[Section 5121](#) of the 2023 Consolidated Appropriations Act requires ForwardHealth and the Children’s Health Insurance Plan (CHIP) programs to

# REMINDER

The Centers for Medicare & Medicaid Services (CMS) define youths as Medicaid members under 21 or former foster care youths under 26. “Former foster care youths” is a defined Medicaid member category referring to any person under the age of 26 who was formerly in foster care, subsidized guardianship, or court-ordered kinship care on the date they turned 18 years old.

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provide HealthCheck screens and TCM services to Medicaid-enrolled youths with justice involvement.

ForwardHealth will either:

- Reimburse correctional facilities or their community-based partners who choose to enroll with Wisconsin Medicaid for performing HealthCheck screens and TCM services.
- Obtain attestation forms from correctional facilities that choose not to enroll with Wisconsin Medicaid.

To maintain compliance with federal regulations, correctional facilities can choose from four different pathways:

- Enroll with Wisconsin Medicaid and submit claims to be reimbursed for HealthCheck and TCM services (**began April 1, 2026**).
- Provide HealthCheck and TCM services without enrolling with or billing Wisconsin Medicaid (began in January 2025).
- Contract with community-based HealthCheck and TCM providers to provide required services (began in January 2025).
- Determine it's not feasible to provide HealthCheck and TCM services (began in January 2025).

## DID YOU KNOW?

Correctional facilities that choose not to enroll with Wisconsin Medicaid must follow the instructions in this Update for submitting either the **Correctional Facility Attestation of Service Requirements form, [F-03418 \(01/2026\)](#)**, or the **Correctional Facility Attestation of Feasibility Issues form, [F-03417 \(01/2026\)](#)**.

Refer to the ForwardHealth Online Handbook Medical Services for Youths Leaving Public State Prisons or Correctional Facilities topic [#23597](#) and Correctional Facility Providers topic [#24283](#) for more information.

## Information for Correctional Facilities Choosing Not to Enroll With Wisconsin Medicaid

Some correctional facilities may provide HealthCheck screenings and TCM services without enrolling with Wisconsin Medicaid. They can use their existing medical staff but choose not to file claims with Wisconsin Medicaid.

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Correctional facilities are also compliant if they bring in community-based staff to perform the services but don't bill Wisconsin Medicaid.

Although HealthCheck screenings and TCM services are federally mandated, correctional facilities can opt out if there is no feasible way to provide these services to Medicaid members.

A correctional facility might not provide these services if, for example:

- The physical location's capability is limited.
- The facility lacks health care staff.
- The facility refuses to allow a community-based provider presence.
- The individuals are incarcerated at the facility for short stays.
- The facility has low Medicaid census.

**“Although HealthCheck screenings and TCM services are federally mandated, correctional facilities can opt out if there is no feasible way to provide these services to Medicaid members.”**

## Required Attestation Forms for Correctional Facilities Choosing Not to Enroll With Wisconsin Medicaid

Correctional facilities that choose not to enroll with Wisconsin Medicaid must either:

- Submit the Correctional Facility Attestation of Service Requirements form if they want to fulfill these services outside Wisconsin Medicaid.
- Submit the Correctional Facility Attestation of Feasibility Issues form if they decline to participate in the services provided as a result of the federal mandates.

Forms can be found on the [Forms](#) page of the Portal) and must be submitted to [DHSDMSCAA@dhs.wisconsin.gov](mailto:DHSDMSCAA@dhs.wisconsin.gov). Correctional facilities only need to submit these forms once, unless they want to switch to another pathway. Correctional facilities should contact [DHSDMSCAA@dhs.wisconsin.gov](mailto:DHSDMSCAA@dhs.wisconsin.gov) to start this change.

## Who Can Receive HealthCheck Screenings and Targeted Case Management Services?

HealthCheck screenings and TCM services are available to youths who are currently post-adjudicated and incarcerated in public state prisons or correctional facilities and are:

- Eligible for Wisconsin Medicaid prior to or during incarceration.

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- Under 21 or former foster care youths under 26.

Note: “Former foster care youths” is a defined Medicaid member category referring to any person under the age of 26 who was formerly in foster care, subsidized guardianship, or court-ordered kinship care on the date they turned 18 years old.

## HealthCheck Screening Information

The HealthCheck benefit provides periodic, comprehensive health screening exams.

Refer to the Comprehensive HealthCheck Screening Components and Periodicity topic #[2402](#) and the Choosing Appropriate Components for a Member topic #[2404](#) for more information.

## Targeted Case Management Services Information

Per Wis. Admin. Code § [DHS 107.32\(1\)\(a\)1](#), case management services help members and, when appropriate, their families **gain access to and coordinate** a full array of services, including medical, social, educational, and vocational services. These case management services include:

- Case assessment as defined in Wis. Admin. Code § [DHS 107.32\(1\)\(b\)](#).
- Case plan development as defined in Wis. Admin. Code § [DHS 107.32\(1\)\(c\)](#).
- Ongoing monitoring and service coordination as defined in Wis. Admin. Code § [DHS 107.32\(1\)\(d\)](#).

Ongoing service monitoring or service coordination includes face-to-face, virtual, and phone contact for the purpose of assessing or reassessing needs or planning or monitoring services. This includes a case manager’s travel time when providing the covered case management service.

Ongoing case management services include:

- Face-to-face, virtual, and phone contact with members.
- Face-to-face, virtual, and phone contact with anyone who has direct, supportive contact with a member.
- Record keeping as necessary for case planning, coordination, and service monitoring.

Refer to the A Comprehensive Overview topic #[1691](#) for more information about TCM.

## REMINDER

Members eligible for HealthCheck screenings and TCM services are public institution inmates:

- Eligible for Wisconsin Medicaid prior to or during incarceration.
- Under 21 or former foster care youths under 26.

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## HealthCheck and Targeted Case Management Timing Requirements

Providers can perform and bill for HealthCheck screens 30 days before release and around one week after release.

Providers can perform and bill for TCM services 30 days before release and 30 days after release.

Eligible members can continue to have access to these services through their Medicaid coverage.

## Provider Enrollment With Wisconsin Medicaid

Beginning April 1, 2026, correctional facilities and their staff can enroll with Wisconsin Medicaid as providers and submit claims to be reimbursed for HealthCheck and TCM services. Correctional facilities can enroll as billing providers. Correctional facility staff can enroll in their appropriate provider area, such as registered nurses, HealthCheck providers, or TCM providers, and will be listed as the rendering provider on the claim.

**Both correctional facilities and correctional facility staff follow the same enrollment process.** Providers have 10 days to complete their application. If it's not completed within 10 days, the correctional facility or correctional facility staff will need to restart the application process.

Note: CMS has waived enrollment fees for correctional facilities.

## Wisconsin Medicaid Provider Enrollment Process

Correctional facilities and correctional facility staff can find information about enrollment on the [Provider Enrollment Information](#) area of the Portal. The [Information for Specific Provider Types](#) page describes enrollment information specific to correctional facilities.

To enroll with Wisconsin Medicaid as a correctional facility, a provider should:

1. Access the [Portal](#).
2. Click **Become a Provider** in the Providers box on the Portal homepage to open the Provider Enrollment Information area.
3. Click [Start or Continue Your Enrollment Application](#) box on the Provider Enrollment Information homepage.
4. Click [Medicaid/Border Status Provider Enrollment Application](#) in the To Start a New Medicaid Enrollment box.
5. Read the instructions, then click **Next**.

## PA FORMS

- Correctional Facility Attestation of Service Requirements form, F-03418 (01/2026)
- Correctional Facility Attestation of Feasibility Issues form, F-03417 (01/2026)

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6. Navigate through the enrollment wizard, enter or select the applicable information, and click **Next** to continue.
7. Select **Correctional Facility** from the Provider Type panel.
8. Continue through the enrollment panels to complete the application.

### Notice of Enrollment Decision

After a provider completes the enrollment application, ForwardHealth will either:

- Approve the application and enroll the provider.
- Deny the application and send a letter to the provider with reasons for the denial.

ForwardHealth will notify the applicant of their enrollment status in less than 60 days and usually within 10 business days.

ForwardHealth will send a welcome letter to new Medicaid-enrolled providers with a copy of the provider agreement and an attachment. This attachment contains important information such as effective dates and the assigned provider type and specialty.

### Effective Date of Enrollment

ForwardHealth will base the effective date of a provider's enrollment on the date ForwardHealth receives their complete and correct enrollment application materials. ForwardHealth considers an application complete when:

- The applicant correctly submits all required information.
- ForwardHealth receives all required supplemental documents, if applicable.

The date the provider submits their online enrollment application to ForwardHealth is the earliest effective date possible and will be the effective date if both are true:

- The provider meets all requirements.
- ForwardHealth received all the required supplemental documents within 30 calendar days of the date when the enrollment application was submitted. For the earliest possible enrollment effective date, providers are encouraged to upload documents during the enrollment process.

If ForwardHealth receives any supplemental documents more than 30 days after the provider has submitted their application, the provider's effective date will be the date ForwardHealth received all of these documents.

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## Revalidation for Enrolled Providers

ForwardHealth requires all enrolled correctional facilities to revalidate their enrollment information every three years to continue to receive reimbursement from Wisconsin Medicaid. The same applies to staff enrolled in their provider-appropriate area.

CMS has waived enrollment revalidation fees for correctional facilities.

Most of the revalidation process will be completed on a provider's secure ForwardHealth Provider Portal account, where correctional facilities and staff must:

- Update their enrollment information.
- Sign the Wisconsin Medicaid Provider Agreement.
- Sign the Acknowledgement of Terms of Participation during the revalidation process.

### *Provider Revalidation Notice*

When it is time to revalidate, ForwardHealth will mail a Provider Revalidation Notice to enrolled correctional facilities. The Provider Revalidation Notice specifies the correctional facility's revalidation date, which is when the correctional facility may begin their revalidation.

**Correctional facilities have 30 days from their revalidation date to submit their revalidation application.**

The Provider Revalidation Notice will be mailed to the correctional facility's address on file. Correctional facilities should keep their address up to date in the Portal to make sure they get timely notification of the need to revalidate. Correctional facilities may [check their revalidation date](#) at any time on the Portal. Correctional facilities must submit their revalidation application by the deadline or their Wisconsin Medicaid enrollment will end.

If a correctional facility wishes to re-enroll, they must complete a re-enrollment application and undergo additional screening. ForwardHealth will not backdate a correctional facility's enrollment to cover gaps that occur after the revalidation date is missed.

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## Establishing a Portal Account

Providers use their secure Provider Portal accounts to keep their information current with ForwardHealth. To request Portal access and the necessary PIN, providers should:

1. Access the [Portal](#), and click the **Providers** icon.
2. In the Quick Links box on the Providers page, click **Request Portal Access** to display the Request Portal Access page.
3. Enter the provider's National Provider Identifier (NPI) in the NPI Information section. (Note: If a provider does not have an NPI, refer to the Provider Identification topic [#3421](#) for information on how to request one.)
4. Click **Search**. The ForwardHealth Enrollment for Requested NPI section will auto-populate with the provider's information that ForwardHealth has on file. If ForwardHealth cannot find the NPI, the page will refresh and will not populate with the provider's information.
5. Click the appropriate row from the ForwardHealth Enrollment for Requested NPI section. The Selected NPI section will auto-populate with the selected information.
6. Enter the provider's Social Security number (SSN) or Tax Identification Number (TIN) in the SSN or TIN field in the Selected NPI section.
7. Click **Submit**. A confirmation page will display if the request is successful.

After a provider successfully requests Portal access, ForwardHealth will mail a letter to the provider that includes:

- A PIN. Providers must receive a PIN to access their secure Provider Portal account.
- A login ID. For security purposes, the login ID only has digits three–six of the NPI or Provider ID.

Providers should not share their login information with anyone except appropriate staff. ForwardHealth recommends that providers change their login information when staff changes occur.

The [ForwardHealth Provider Portal Account User Guide \(PDF\)](#) offers information on setting up Portal accounts and includes instructions on adding multiple organizations to an existing Portal account.

## RESOURCES

The [ForwardHealth Provider Portal Account User Guide \(PDF\)](#) offers information on setting up Portal accounts and includes instructions on adding multiple organizations to an existing Portal account.

## Maintaining Demographic Information

Once enrolled, providers are responsible for updating their information, such as addresses, through the demographic maintenance tool. Correctional facilities and staff can access the demographic maintenance tool by logging in to the Portal and clicking Demographic Maintenance from the Home Page box on the secure Provider page.

The [ForwardHealth Portal Demographic Maintenance Tool User Guide \(PDF\)](#) provides details on updating information on the Portal.

## Procedure Codes and Reimbursement

### Billing Versus Rendering Providers

Correctional facility staff enrolled as rendering-only providers practice under the professional supervision of the correctional facility. As rendering-only providers, correctional facility staff must track the services they deliver but cannot submit claims to ForwardHealth directly. Instead, they have reimbursement rates established for their provider type. Claims for services provided by correctional facility staff must include the correctional facility as the billing provider.

As billing providers, correctional facilities submit all claims with Healthcare Common Procedure Code System (HCPCS) procedure codes and applicable modifiers. ForwardHealth will deny claims or claims adjustments without a valid HCPCS procedure code and corresponding modifier.

### Submitting a Claim

To receive payment, correctional facilities must bill ForwardHealth for covered services on a professional claim using one of three methods:

- An 837 Health Care Claim: Professional electronic transaction
- Direct Data Entry on the Portal
- A 1500 Health Insurance Claim Form

Providers should refer to the [maximum allowable fee schedule](#) for reimbursement rates.

A place of service (POS) code must be included on a ForwardHealth claim. The allowable POS code for procedures performed in a correctional facility is **09 (Prison/correctional facility)**.

# RESOURCES

- [Section 5121](#) of the 2023 Consolidated Appropriations Act
- Wis. Admin. Code § [DHS 107.32\(1\)\(d\)](#)

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## COVERED SERVICES

Procedure Codes	Modifiers	Service Description
99381–99385 and 99391–99395	UA (Comprehensive HealthCheck screen results in a referral or follow-up visit for diagnostic or corrective treatment)	HealthCheck screening services
T1017 (Targeted Case Management, each 15 minutes)	First service: U1 (Assessment) Second service: U5 (Conditions of Participation [COP]) or U6 (non-COP)	TCM

### Resources

ForwardHealth encourages providers to use these resources on the Portal for answers to questions and assistance.

### Training

Providers can use the recorded [Trainings](#) under the Provider/Service Area Specific drop-down menu for more information about the enrollment process.

### Online Handbook and Updates

Providers can find the most current policy in the [Online Handbook](#). Correctional facilities are required to follow all existing ForwardHealth policies and procedures detailed in the Online Handbook.

[Updates](#) announce the latest changes in ForwardHealth policy and coverage.

### Portal Messaging and Email Subscription

ForwardHealth sends Portal account and email subscription messages to notify providers of newly released Updates and other information.

Providers can receive notifications about Updates if they [sign up for email subscription messages](#). Providers who have established Portal accounts will automatically receive notifications from ForwardHealth in their Portal Messages inbox.

### Provider Services

For questions, contact Provider Services at 800-947-9627, Monday–Friday, 7 a.m.–6 p.m. Central Time.

Providers can access enrollment information by calling WiCall, an automated voice response system, at 800-947-3544 and select option “1” to begin.

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## Correctional Facilities Resources Page

Providers can find information specific to correctional facilities on the [Resources for Correctional Facilities](#) page of the Portal.

## Documentation Retention

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § [DHS 106.02\(9\)](#). Providers are required to produce or submit documentation, or both, to the Wisconsin Department of Health Services (DHS) upon request. Per Wis. Stat. § [49.45\(3\)\(f\)](#), providers of services shall maintain records as required by DHS for verification of provider claims for reimbursement. DHS may audit such records to verify the actual provision of services and the appropriateness and accuracy of claims. DHS may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in denial of submitted claims, recoupment of paid claims, application of intermediate sanctions, or termination from the Medicaid program.

## Information Regarding Managed Care Organizations

This Update applies to correctional facility care that eligible members receive on a fee-for-service basis. For information about managed care implementation of any post-release service coordination, including re-enrollment in an HMO, contact the appropriate managed care organization (MCO). MCOs are required to provide at least the same benefits as those provided under fee-for-service arrangements.

# THE KEY MESSAGE

Correctional facility providers can receive Medicaid reimbursement for HealthCheck and TCM services beginning April 1, 2026.

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The ForwardHealth Update is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Medicaid Services within the Wisconsin Department of Health Services (DHS). The Wisconsin HIV Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health within DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at [www.forwardhealth.wi.gov/](http://www.forwardhealth.wi.gov/).