Commonwealth of Massachusetts
Executive Office of Health and Human Services
Office of Medicaid
www.mass.gov/masshealth

Eligibility Operations Memo 26-10

DATE: September 2026

TO: MassHealth Eligibility Operations Staff

FROM: Heather Rossi, Deputy Chief Operating Officer, Eligibility Policy and Implementation

RE: **Federal Coverage Changes for Certain Noncitizens**

Summary of Changes

Starting October 1, 2026, the federal government is making changes to MassHealth coverage for certain immigrants. As a result, comprehensive MassHealth coverage will no longer be available to certain immigrants. Impacted individuals include those who came to the United States as refugees, those who were granted asylum, those who were given humanitarian parole for at least one year, those who have an immigration status because they or their family survived abuse or trafficking, and others.

In most cases, children younger than 21 and people who are pregnant or postpartum can keep their prior coverage. Adults who are disabled or ages 65 and older will generally be eligible for MassHealth Family Assistance. MassHealth intends to update its regulations to reflect these changes.

Please note, these changes do not impact U.S. Citizens and U.S. Nationals.

Eligibility Information

Due to federal changes, some "qualified noncitizens" will generally not experience a change in eligibility based on immigration status (Group 1), while other "qualified noncitizens" will experience a change in coverage unless they are children younger than 21 or are pregnant/postpartum (Group 2). The impacted immigration statutes and eligibility changes are described below.

Non-Impacted Qualified Noncitizens: Group 1

Individuals with the following statutes are not impacted by the federal changes:

- Legal permanent residents (Green Card holders who have met or are exempt from the five-year bar)

- Cuban and Haitian Entrants (Refer to EOM 22-03)
- People from Micronesia, the Marshall Islands, and Palau living in the US under a special agreement called the Compact of Free Association (COFA) (refer to EOM 21-18)

People with these statuses will not experience a change in coverage, and the eligibility rules will remain the same. MEC staff should continue to process eligibility business as usual in these cases.

Impacted Qualified Noncitizens: Group 2

Adults who are 21 or older with the following immigration statutes will be impacted by the federal changes and will no longer be eligible for comprehensive MassHealth coverage. These individuals will only be eligible for MassHealth Limited and/or the Health Safety Net:

- Persons granted asylum
- Refugees
- Persons whose deportation has been withheld
- Veterans, their spouses, and their children including
  - veterans of the United States Armed Forces with an honorable discharge not related to their noncitizen status;
  - Filipino war veterans who fought under U.S. command during WWII;
  - Hmong and Highland Lao veterans who are admitted for legal permanent residence (LPR) and who fought under U.S. command during the Vietnam War;
  - persons with noncitizen status on active duty in the U.S. Armed Forces, other than active duty for training; or
  - the spouse, unremarried surviving spouse, or unmarried dependent children of the noncitizen described in 130 CMR 504.003(A)(1)(a)4. a. through d.
- Conditional Entrants in effect before April 1, 1980
- Native Americans with at least 50 percent American Indian blood who were born in Canada, or other tribal members born in territories outside of the US
- Amerasians
- Victims of severe forms of trafficking, including the spouse, child, sibling, or parent of the victim
- Iraqi Special Immigrants granted special immigrant status
- Afghan Special Immigrants granted special immigrant status
- Individuals granted parole for at least one year under section 212(d)(5) of the Immigration and Nationalization Act who have met the five year bar
- Battered spouses, battered children, children of battered parents, or parents of battered children who meet the criteria of section 431(c) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) who have met the five year bar

Adults who are 21 or older in these statuses will experience a change in coverage and will generally fall into the following coverage types.

- Adults ages 21–64 who are not disabled will receive MassHealth Limited

- Adults ages 21–64 who are disabled will receive MassHealth Family Assistance
- Adults 65 and older will receive MassHealth Family Assistance

A person's eligibility is based on their categorical and financial eligibility factors, which may result in a determination other than these coverage types.

Children younger than 21 or pregnant/postpartum individuals are protected from these federal changes, even if they have a Group 2 immigration status, and **will generally not experience a change in coverage**.

Eligibility Systems

Changes have been made to HIX and MA21 to redetermine eligibility and coverage type based on a person's circumstances. These changes will take effect starting October 1, 2026.

New immigration codes will be displayed for Impacted Qualified Noncitizens: Group 2

HIX will display "**QLP2"**
MA21 will display "**E"**
MMIS will display "**E"**

MassHealth will continue to first check available state data sources when processing eligibility determinations.

Members Receiving SSI Benefits

Certain MassHealth members receiving federal Supplemental Security Income (SSI) are also affected by federal Medicaid changes and will have their MassHealth coverage redetermined. They may still be eligible for SSI but will no longer be eligible for MassHealth Standard. Generally, they will only be eligible for MassHealth Family Assistance, if they meet the requirements at 130 CMR 505.005 and 130 CMR 519.013, or MassHealth Limited.

Children under 21 years old and individuals who are pregnant or postpartum will remain eligible for MassHealth Standard.

The Social Security Administration (SSA) is making the following logic changes to the "Medicaid Eligibility Code" field in the SDX data exchange with 1634 State Medicaid agencies.

- Non-Impacted Qualified Noncitizens: Group 1 will display as "Y"
- Impacted Qualified Noncitizens: Group 2 will display as "R"

Redeterminations prior to October 1, 2026

Prior to October 1, 2026, MassHealth will redetermine eligibility for Group 2 individuals (excluding children younger than 21 and pregnant/postpartum individuals). MassHealth will send them a new decision notice which will provide 14 days advance notice and will include appeal rights.

MassHealth will check available data sources before redetermining eligibility. If updated information is not available and the member has not submitted updated immigration documentation, eligibility will be redetermined using the most recent information available. Generally, new eligibility will be effective September 30, 2026.

Appealing the Decision

Federal law cannot be overturned by the MassHealth Board of Hearings. However, a member may request an appeal if they feel a decision was made in error because MassHealth has inaccurate information.

Members Regulations

MassHealth will be revising regulations 130 CMR 504.003 and 130 CMR 518.003. This EOM serves as the policy in effect until final revised regulations are published.

MassHealth Websites and Resources

The links below include current versions of each form and self-service options to request or obtain available MassHealth member records.

- MA Login
- MyServices

Questions?

Have your MEC designee contact the Policy Hotline.