



State of Florida
Department of Children and Families

Ron DeSantis
Governor

Kathryn Williams
Interim Secretary

DATE: August 07, 2026 **TRANSMITTAL NO.:** P-26-08-0007

TO: Economic Self Sufficiency Operations Managers
Economic Self Sufficiency Program Offices

FROM: Julie Reed, Chief, Program Policy
(Signature on File)

SUBJECT: Eligibility Changes for Noncitizens – Medicaid

EFFECTIVE: Upon Receipt

This transmittal provides guidance on changes to Medicaid eligibility requirements for noncitizens. The policy limits the qualifying statuses for Medicaid eligibility and coverage including Child in Care (CIC) and Medically Needy. All other technical factors and financial requirements for Medicaid remain the same.

This does not change the noncitizen requirements for Refugee Medical Assistance (RMA) and Emergency Medicaid for noncitizens (EMA).

This transmittal obsoletes:

P-10-06-0008, P-10-06-0007, P-10-02-0003, P-10-02-0002, I-08-08-0017,
C-05-02-0001, P-04-09-0015, P-04-07-0011, P-04-06-0008, C-04-05-0009,
C-04-04-0006, P-02-11-0113, P-02-10-0099, P-02-10-0094, P-02-08-0083,
P-02-06-0062, P-02-04-0037, P-02-04-0032, P-01-09-0113, P-01-0105-0042,
P-00-09-0126, P-00-04-0047, and P-00-01-0004.

Background

The One Big Beautiful Bill Act of 2025 (OBBBA) enacted changes to noncitizen eligibility for Medicaid effective October 1, 2026. This legislation changed which lawfully residing noncitizens are potentially eligible for Medicaid. Those who become Medicaid ineligible effective October 1, 2026, will be potentially eligible for RMA or EMA only.

Policy

Effective October 1, 2026, only the following noncitizen statuses are potentially eligible for Medicaid:

- **COFA migrants:** A noncitizen who lawfully resides in the U.S. according to the Compact of Free Association, including the Republic of the Marshall Islands, the Federated States of Micronesia and the Republic of Palau.
- **Cuban and Haitian Entrants:** A Cuban/Haitian Entrant is any national of Cuba or Haiti who was granted parole status as a Cuban/Haitian Entrant, or any other

national of Cuba or Haiti who was paroled into the U.S., is subject to deportation, or has an application for asylum pending and has not received a final order of deportation.

- **Lawful Permanent Residents (LPR):** A noncitizen who lawfully immigrates to the U.S. and has permission to live and work in the U.S.
- **Lawfully Residing noncitizen children under age 19.**

Noncitizens who do not meet one of the four qualifying statuses (COFA, Cuban/Haitian, LPR, lawfully residing child under 19) will remain eligible for their current Medicaid coverage through September 30th, 2026.

For those noncitizens who applied for Medicaid after July 1, 2026, but whose case is not processed until 8/21/26 or later, staff will approve coverage through September and deny the October 2026 and ongoing months using reason code “448 – There has been a change in Federal Law that affects Medicaid eligibility for certain noncitizens.”

Five-Year Ban

OBBBA did not change which categories of noncitizens are exempt from the noncitizen five-year ban.

RMA & EMA Eligibility

Except for the noncitizen technical criteria changes listed above, there have been no changes made to eligibility requirements for Medicaid. Noncitizens who no longer qualify for Medicaid based on their status are potentially eligible for RMA or EMA. For additional information on RMA please reference [Transmittal P-26-08-0006](#) and Policy Manual: 1460.0105 through 1460.0112.

Continuous Medicaid for Children

Children under age 19 who retain lawfully residing noncitizen status will continue to be eligible for Continuous Medicaid for children. Children who lose lawfully residing noncitizen status will cease to be eligible for Continuous Medicaid but are potentially eligible for RMA or EMA. Before closing a child’s Medicaid, verify the child’s noncitizen status via SAVE.

Pregnancy & Postpartum Medicaid

Pregnant & postpartum noncitizen women who are COFA migrants, Cuban/Haitian entrants, LPRs or lawfully residing children under age 19 will remain eligible for coverage through their postpartum period. A pregnant or postpartum woman who loses lawfully residing noncitizen status will cease to be eligible for Medicaid but are potentially eligible for RMA or EMA, even if still pregnant or within their postpartum period.

Fair Hearings

There have been no changes made to the Department’s policy regarding an individual’s right to request a fair hearing and request continuation of their Medicaid.

System Changes

In September, the system will be updated to automatically fail noncitizens who will not qualify for Medicaid effective 10/1/2026 (alien status codes 43, 44, 45, 46, 47, 48, 49, 50, 52, 53, 56, 57, and 73) and will fail Medicaid with reason code “448 - There has been a change in Federal Law that affects Medicaid eligibility for certain noncitizens.”

OBBBA One-Time Automated Process for Noncitizens

OBBBA Work Items Identified

In August 2026, the system will complete a one-time automated process to identify all noncitizens potentially ineligible for Medicaid as of October 1, 2026. For each identified noncitizen, the system will automatically:

- create a “People” type Change Work Item in the Management Portal,

Change Information				
Household Information	People	Job/Income	Expenses	Good Cause
Case Closure	Other			

- Work Item will begin with a “2”, and
- Will be identified by User ID that starts with “OBBBACreateWI”:



User ID: **OBBBACreateWI**

08-03-2026 at 02:45:01 PM

- assign the Work Item to staff, and
- generate a pending notice, giving the individual the opportunity to provide verification of their current noncitizen status.

Notes:

- Processing Changes within the Management Portal will not affect/dispose of an OBBBA designated Work Item.
- OBBBA Work Items will be worked manually – there will not be a “Start” button to initiate the wizard flow.
- Staff must not take adverse action on the OBBBA Work Items prior to 8/21/2026.

OBBBA Pending Notice

Once the Work Item has been assigned to a processor, the system will generate a pending notice, giving the individual the opportunity to provide verification of their current noncitizen status. All household members who are identified as becoming potentially ineligible will be selected on the notice.

This pending notice will contain the following information:

“Recent federal law changes under the One Big Beautiful Bill Act (OBBBA) changed Medicaid eligibility rules related to immigration status. Because of these changes, the Department of Children and Families (DCF) must review your immigration status to

determine if you are eligible for Medicaid. To find out if you are eligible for Medicaid under the new federal law, you must provide DCF with documentation verifying your current immigration status. If DCF does not receive the documents, or if the documents do not show that you are eligible under the new rules, your Medicaid coverage will end on September 30, 2026. Visit <https://www.myflfamilies.com/medicaid/medicaid-notice-information/> for more information about the federal changes to Medicaid based on immigration status and the documents you need to provide.”

OBBBA Case Processing

Noncitizens who will no longer qualify for Medicaid based on their current noncitizen status will not have their coverage closed prior to the effective date 9/30/2026. This means that **adverse action may not be taken prior to 8/21/2026.**

All actions, whether beneficial or adverse, must be completed prior to **9/18/2026.**

If individual provides information, **staff** will:

- be notified of returned information in the usual way,
- complete SAVE and upload document to the Management Portal,
- update Alien Status code on AICZ (if necessary),
 - ❖ Reminder: AICZ can only be updated by staff with a FLORIDA Security Level of 75 or higher.
- Next Steps will depend on whether the individual meets noncitizen criteria for Medicaid eligibility effective October 1, 2026, or not.
 - If the noncitizen **meets a qualified status** and will retain Medicaid eligibility after October 1, 2026, staff will:
 - ✓ run AABC,
 - ✓ reauthorize the Medicaid AG with reason code “095”,
 - ✓ dispose of the Work Item immediately, and
 - ✓ update Case Notes in the Management Portal.
 - If the noncitizen **does not meet a qualified status** and will lose Medicaid eligibility effective October 1, 2026, staff will:
 - ✓ hold the Work Item until 8/21/26,
 - ✓ run AABC,
 - ✓ close the Medicaid AG with reason code “448”,
 - ✓ dispose of Work Item (on or after 8/21/26), and
 - ✓ update Case Notes in the Management Portal.
- In either circumstance, staff will not:
 - suppress the notice,
 - terminate EMA AGs (ML A, ML S, NL A or NL S),
 - take adverse action prior to **8/21/2026**,
 - dispose of Work Items for individuals who did not return information.

Note: There may be instances when an individual provides documentation that their noncitizen status meets one of the four Medicaid eligible criteria (COFA migrants,

Cuban/Haitian entrants, LPRs or lawfully residing children under age 19) but SAVE was unable to verify the status and requires staff to “Institute Additional Verification”:

The screenshot displays a process flow with five steps: 1. Case Creation, 2. Photo Match, 3. Additional Verification (highlighted), 4. Case Result, and 5. Case Closure. Below the flow, the title 'SAVE Response' is shown. A yellow warning box contains the following text:

Institute Additional Verification

SAVE was unable to verify the applicant's status on electronic initial verification. There may have been an issue electronically locating the records or additional verification may be required due to conflicting data or the nature of the applicant's status. This is not a final response and should not be used to determine benefit eligibility. Please Institute Additional Verification so SAVE can conduct more research and return the correct status.

In this situation, staff will:

- use the Alien Status code on AICZ that matches the documentation the individual returned,
- authorize their Medicaid (For more information on this policy, see Policy Manual: 1430.0115 & 1440.0115),
- Institute Additional Verification to SAVE, and
- update Case Notes in the Management Portal.

When the Institute Additional Verification SAVE response is returned, staff will:

- update Alien Status code on AICZ (if necessary),
 - Reminder: AICZ can only be updated by staff with a FLORIDA Security Level of 75 or higher
- determine whether coverage should remain open or be terminated based on the individual's SAVE-verified status,
- upload SAVE response to the Management Portal,
- update Case Notes in the Management Portal.

Important Reminders:

- If an individual will be Medicaid eligible on and after October 1, 2026, actions should be taken on the case and Work Item immediately.
- If an individual will NOT be Medicaid eligible on or after October 1, 2026, actions should **not** be taken on the case and Work Item until 8/21/2026.
- All actions, whether beneficial or adverse, must be completed prior to 9/18/2026.

OBBBA Automatic Case Closure

If an individual does not provide information, the **system** will:

- close the Medicaid for noncitizens whose status code on AICZ is: 43, 44, 45, 46, 47, 48, 49, 50, 52, 53, 56, 57, or 73,
 - EMA AGs (ML A, ML S, NL A and NL S) will not be terminated
- send the Medicaid Notice of Case Action,

- update Case Notes in the Management Portal, and
- dispose of the Work Item.

Notes:

- If an Assistance Group (AG) contains a member who will remain eligible for Medicaid and another member will lose their eligibility due to their noncitizen status, **staff** will be responsible for taking action on the case and disposing the Work Item.
- If automatic system closure is unsuccessful, the Work Item will not be automatically disposed and staff will be responsible for taking action.

Important Reminder:

Staff must **not** take action on Work Items without returned information so that the system can automatically determine if the individual's AG should be closed and dispose of the Work Item.

FLORIDA Table TCTZ Changes

Medicaid Eligibility

Effective 10/1/26, only the following status codes on Table TCTZ will build Medicaid:

39	Lawful Permanent Resident with Prior Refugee code (207)
40	Lawful Permanent Resident admitted before 8/22/96
41	Lawful Permanent Resident admitted on or after 8/22/96
42	COFA Individual
54	Cuban/Haitian Entrant (501(e))
60	Lawful Permanent Resident with prior Asylee code under 208
61	Lawful Permanent Resident with prior Amerasian code
62	Lawful Permanent Resident with prior Cuban/Haitian Entrant code
63	National of Cuba or Haiti Paroled 212(d)5
64	National of Cuba or Haiti who is an Asylum Applicant
65	National of Cuba or Haiti with an Indefinite Stay of Deportation
66	National of Cuba or Haiti whose Deportation is Withheld (243(h), or 241(b)(3))
67	Lawful Permanent Resident Child Under 18 Without 5 Year Wait
68	Qualified noncitizen who was 65 and Lawfully Residing in the U.S. on or before 8/22/96
69	Qualified noncitizen Blind or Disabled Lawfully Residing in the U.S. on or before 8/22/96
75	Qualified noncitizen Blind or Disabled or Qualified noncitizen Child Under 18
77	Lawfully Residing Children Under 19

Note: There are currently not specific alien status codes in FLORIDA for the statuses listed below - use alien status code "39" on AICZ and document Case Notes:

- Lawful Permanent Residents with prior Veteran/Active US Military or Spouse Child status, or
- Lawful Permanent Residents with prior Deportation Withheld 243(H)/241(B)(3) status.

RMA & EMA Eligibility

Effective 10/1/26, the following noncitizen status codes on Table TCTZ will no longer build Medicaid but will build EMA; RMA eligibility will require a workaround, see below.

43	Spouse/Child of Active-Duty U.S. Military or a Veteran
44	Battered Individual 204(a)(I)(A) admit before 8/22/1996
45	Battered Individual 204(a)(I)(A) Individual admit on/after 08/22/96
46	American Indians born outside the United States
47	Conditional Entrant under 203(a)(7) admitted before 8/22/96
48	Conditional Entrant under 203(a)(7) admitted on or after 8/22/96 *
49	Paroled under 212(d)(5) for at least 1 year admitted before 8/22/96
50	Paroled under 212(d)(5) for at least 1 year admitted on or after 8/22/96
52	Refugee under 207/Victims of Human Trafficking *
53	Granted Asylum under 208 *
56	Deportation Withheld under 243(h) or 241(b)(3)
57	Amerasian *
73	Victims of Human Trafficking *

* Status code for potential RMA eligibility.

OBBBA RMA Workaround

Currently the FLORIDA system will not build RMA coverage when a MAGI or non-MAGI AG fails. If the noncitizen meets a qualifying status for RMA and the system does not build refugee coverage, staff are responsible for determining eligibility.

When the noncitizen's non-MAGI category fails "448", staff will overtype that category with "MRR":

AGCC SFU COMPOSITION CHANGE 08/29/2026
CASE: 5007904368 WORKER: FZ0584 FZ0584
CATEGORY SEQUENCE IND STAT REASONS SFU DELETE
MM S 1 A FAIL 448
PRIMARY REASON: THERE HAS BEEN A CHANGE IN FEDERAL LAW THAT AFFECTS MEDICAID ELIGIBILITY
INDIVIDUALS: 01
PARTICIPATION: EA
OPTION TYPE: N
DELETE REASON
INDIVIDUALS:
PARTICIPATION:
OPTION TYPE:
DELETE REASON
(IF CASH AG - CHECK RELATED MEDICAL AG)
INDIVIDUALS
1 MARLE B

AGCC	SFU COMPOSITION CHANGE										08/29/2026		
CASE: 5007904368			WORKER: FZ0584					FZ0584					
CATEGORY	SEQUENCE	IND	STAT	REASONS							SFU DELETE		
mrr	1	A	FAIL	448									
PRIMARY REASON: THERE HAS BEEN A CHANGE IN FEDERAL LAW THAT AFFECTS MEDICAID ELIGIBILITY													
INDIVIDUALS:	01	—	—	—	—	—	—	—	—	—	—	—	—
PARTICIPATION:	EA	—	—	—	—	—	—	—	—	—	—	—	—
OPTION TYPE:	N	—	—	—	—	—	—	—	—	—	—	—	—
DELETE REASON	—	—	—	—	—	—	—	—	—	—	—	—	—
INDIVIDUALS:	—	—	—	—	—	—	—	—	—	—	—	—	—
PARTICIPATION:	—	—	—	—	—	—	—	—	—	—	—	—	—
OPTION TYPE:	—	—	—	—	—	—	—	—	—	—	—	—	—
DELETE REASON	—	—	—	—	—	—	—	—	—	—	—	—	—
(IF CASH AG - CHECK RELATED MEDICAL AG)													
INDIVIDUALS													

1 MARLE B													

Note: If the noncitizen's income exceeds the income limit for MRR, system will loop and build NRR.

- On AWAA, close the non-MAGI AG and approve the MRR/NRR:

AWAA				ASSISTANCE GROUP AUTHORIZATION					08/29/2026			
CASE: 5007904368				WORKER: FZ0584					FZ0584			
EFFECTIVE BEGIN DATE: 08/29/2026 STATUS: OPEN												
				ELIG	MONTHLY	AG	REASON	BUDGET	BUDGET	SUPPRESS		
CAT	SEQ	AG	NAME	STAT	AMT/SOC	STAT	CODES	EFFECT	END	CR	CN	AUX
MM	S	01	M BAPTI	PASS	.00	cl	448	05012026		S	N	
MRR	01	M	BAPTI	PASS	.00	op	040	10012026		S	N	
MRR	01	M	BAPTI	FAIL	.00	de	249	09012026	09302026	S	N	
MRR	01	M	BAPTI	FAIL	.00	de	249	08012026	08312026	S	N	

Once the MRR or NRR is approved, staff will determine how many months of RMA individual is entitled to and document in Case Notes, at minimum the following:

- the specific household member(s),
- their noncitizen status,
- the noncitizen's entry date/eligibility date,
- how many remaining months of RMA eligibility remaining, and
- that OBBBA RMA Workaround was used to authorize the RMA coverage.

General Reminders

- At application, the noncitizen status for each Medicaid applicant must be verified.
- At renewal, staff must review the previously verified USCIS document and SAVE results to determine if the client's status has expired.
 - If noncitizen status has expired, staff must check SAVE to determine their current noncitizen status.
 - If SAVE does not provide an immediate response, staff must **"Institute Additional Verification"** to SAVE and authorize their Medicaid (For more information on this policy, see Policy Manual: 1430.0115 & 1440.0115). See *Page 5 above*.
- If a client's noncitizen status was previously verified, staff must not re-verify the status unless the noncitizen has reported a change in status, there is discrepant information, or the previously verified noncitizen status has expired. For more information, see Transmittal [P-17-03-0005](#).
- All SAVE results must be uploaded to the Management Portal and Case Noted.

Regional Program Offices with policy questions related to this transmittal should submit them through the Policy Technical Assistance Request page. For system-related questions, regional offices may contact Laquetta Anderson at Laquetta.Anderson@myflfamilies.com.

cc: Assistant Secretary for Economic Self-Sufficiency (Bridget Royster)
Assistant Secretary for Office of Child and Family Well-Being (Brooke Bass)
Assistant Secretary for Office of Community Services (Jonathan Stephens)
Assistant Secretary for Office of Substance Abuse and Mental Health (Amanda VanLaningham)
Deputy Assistant Secretary for Regional Operations (Doane Rohr)
Deputy Secretary for Programs (Jamie Dattoli)
Director of Operations (Terri Lynch)
Regional ESS Directors
Business Operations (Laura Kirksey)
Customer Experience (vacant)
Data and Information Technology (Chris Presnell)
Director of Operations (Terri Lynch)
Enterprise Support (Mark Miller)
ESS Programs and Policy (Tera Bivens)
FLORIDA Help Desk (Natarsha Peacock)
Information Technology (Sarah Monbarren)
Office of Appeal Hearings (Karina Sarmiento)
Office of Communications (Morgan Jones)
Office of the General Counsel (Shawn Belcher)
Public Benefits Integrity (Sheri Hall)
Strategic Programs and Innovation (Heather DeFrancisco)
AHCA (Devona Pickle, Cole Giering, Paula James, Jennifer Giddens)
Florida Healthy Kids (Suzetta Furlong)