
CMCS Informational Bulletin

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SUBJECT: **DHS Terminations of Parole Programs for Cubans, Haitians, Nicaraguans, and Venezuelans: Implications for Medicaid and CHIP Eligibility and Verification Process**

This Center for Medicaid and CHIP Services (CMCS) Informational Bulletin is being issued to remind states about their responsibility to redetermine a beneficiary's eligibility for Medicaid and/or the Children's Health Insurance Program (CHIP) when the state becomes aware of changes in a beneficiary's circumstances that may impact eligibility for these programs, such as a change in immigration status or category¹ (e.g., parole).

On March 25, 2025, the U.S. Department of Homeland Security (DHS) issued a *Federal Register* notice entitled "Termination of Parole Processes for Cubans, Haitians, Nicaraguans, and Venezuelans,"² that terminated the categorical parole programs established in 2022 and 2023 for aliens³ from Cuba, Haiti, Nicaragua, and Venezuela and their immediate family members (CHNV parole programs).⁴ After a brief temporary pause by a lower court, on May 30, 2025, the U.S. Supreme Court issued an order allowing DHS to proceed with terminating parole granted under the CHNV parole programs.⁵ Subsequently, DHS issued a Notice of Termination of Parole to CHNV parolees informing them that their parole under the CHNV parole programs was

¹ The term "category" is used for certain noncitizens and relates to eligibility for certain federal public benefits, including Medicaid, rather than to a specific immigration status, such as the category of Cuban/Haitian entrants described at 8 U.S.C. § 1641(b)(7); also, Cuban/Haitian entrants are described at section 1903(v)(5)(B)(iii) of the Social Security Act (the Act) applicable on and after October 1, 2026. *See* <https://www.uscis.gov/save/resources/information-for-save-users-cuban-haitian-entrants>.

² *See* "Termination of Parole Processes for Cubans, Haitians, Nicaraguans, and Venezuelans," 90 FR 13611 (Mar. 25, 2025), at <https://www.federalregister.gov/documents/2025/03/25/2025-05128/termination-of-parole-processes-for-cubans-haitians-nicaraguans-and-venezuelans>.

³ We use the term "alien" in this Informational Bulletin to align with Immigration and Nationality Act (INA) and DHS policy guidance. However, we note that Medicaid regulations use the term "noncitizen." *See* 42 C.F.R. § 435.4, defining "noncitizen" as having the same meaning as the term "alien" (defined at 8 U.S.C. § 1101(a)(3)) and includes any individual who is not a citizen or national of the United States (defined at 8 U.S.C. § 1101(a)(22)).

⁴ *See* Implementation of a Parole Process for Cubans, 88 FR 1266 (Jan. 9, 2023); Implementation of a Change to the Parole Process for Cubans, 88 FR 26329 (Apr. 28, 2023); Implementation of a Parole Process for Haitians, 88 FR 1243 (Jan. 9, 2023); Implementation of a Change to the Parole Process for Haitians, 88 FR 26327 (Apr. 28, 2023); Implementation of a Parole Process for Nicaraguans, 88 FR 1255 (Jan. 9, 2023); Implementation of a Parole Process for Venezuelans, 87 FR 63507 (Oct. 19, 2022); Implementation of Changes to the Parole Process for Venezuelans, 88 FR 1279 (Jan. 9, 2023).

⁵ *Noem v. Svitlana Doe*, 605 U.S. ____ (2025).

terminated and that any employment authorization based on being paroled under the CHNV parole programs was revoked. According to DHS, no new requests for parole under the CHNV parole programs will be processed.⁶

Further, DHS continues to exercise its discretionary authority to terminate parole, where warranted, on a case-by-case basis for any alien whom DHS paroled into the United States. DHS may also revoke the parole-based employment authorization for any alien whose parole has since been terminated.⁷

CMS reminds states of their responsibility to redetermine the eligibility of beneficiaries whenever the state receives reliable information or otherwise becomes aware of a potential change in circumstances that may affect beneficiary eligibility, in accordance with regulations in 42 C.F.R. § 435.916(d)⁸ for Medicaid, cross-referenced at 42 C.F.R. § 457.343 for CHIP. DHS's termination of parole for aliens paroled under the CHNV parole programs and other case-by-case parole terminations qualify as a change in circumstances that may impact their satisfactory immigration status⁹ and, therefore, their eligibility for full Medicaid and CHIP benefits. As such, states must act in accordance with these regulations to redetermine eligibility of these potentially ineligible beneficiaries.

Specifically, aliens whose parole into the United States has been terminated may no longer be considered qualified aliens¹⁰ or lawfully residing.¹¹ As a result, they may lack satisfactory immigration status for eligibility for full Medicaid or CHIP benefits unless they have another satisfactory immigration status or category, such as Lawful Permanent Resident status (also

⁶ See <https://www.uscis.gov/save/current-user-agencies/guidance/faqs-on-the-effect-of-changes-to-parole-and-temporary-protected-status-tps-for-save-agencies>.

⁷ See <https://www.uscis.gov/newsroom/alerts/litigation-related-update-supreme-court-stay-of-chnv-preliminary-injunction> and <https://www.uscis.gov/save/current-user-agencies/guidance/faqs-on-the-effect-of-changes-to-parole-and-temporary-protected-status-tps-for-save-agencies>

⁸ We refer to the requirements at 42 C.F.R. § 435.916 as amended by the interim final rule with comment period titled "Medicaid Program; Community Engagement Requirement for Certain Individuals" (91 FR 33348 (June 3, 2026)), which are effective July 31, 2026. Prior to July 31, 2026, please note the regulation language at 42 C.F.R. § 435.916 from 2023. Section 71102 of Public Law 119-21 (which CMS refers to as the "Working Families Tax Cut" (WFTC) legislation) imposed a moratorium prohibiting CMS from implementing, administering or enforcing certain amendments made by a CMS final rule entitled "Streamlining the Medicaid, Children's Health Insurance Program, and Basic Health Program Application, Eligibility Determination, Enrollment, and Renewal Processes" (89 FR 22780 (Apr. 2, 2024)) (the "2024 Eligibility and Enrollment (E&E) Final Rule"). The moratorium applies to certain provisions of the 2024 E&E Final Rule that have a compliance date after July 4, 2025, the date the WFTC legislation was enacted, and includes the renewal requirements and the requirements for acting on changes in circumstances at 42 C.F.R. § 435.916, including those cross-referenced at 42 C.F.R. § 457.343.

⁹ Section 1137(d) of the Act.

¹⁰ See 8 U.S.C. § 1641(b)(4); 42 C.F.R. § 435.4 (defining "qualified noncitizen" for Medicaid), and 42 C.F.R. §§ 457.320(b)(6) and (c) (for CHIP). Note: section 71109 of the WFTC legislation amended sections 1903(v) and 2107(e)(1)(R) of the Act; beginning October 1, 2026, the statutory changes made by section 71109 of the WFTC legislation will impact payment for full Medicaid and CHIP benefits for certain noncitizens. For more details on section 71109 of WFTC legislation, see the Apr. 8, 2026, State Health Official (SHO) letter #26-001, available at: <https://www.medicaid.gov/federal-policy-guidance/downloads/sho26001.pdf>.

¹¹ Section 1903(v)(4) of the Act (for Medicaid) and section 2107(e)(1)(Q) of the Act (for CHIP), established by section 214 of the Children's Health Insurance Program Reauthorization Act of 2009 (referred to as the "CHIPRA 214 option").

known as a green card holder) or classification as a Cuban or Haitian entrant.¹² States must identify Medicaid and CHIP beneficiaries whose parole has been terminated¹³ and redetermine their eligibility.

We note that DHS has a self-service report called the “Status Change Report” that states should use to identify previously submitted Systematic Alien Verification for Entitlements ([SAVE](#)) cases for aliens whose parole-based employment authorization document (EAD) has been revoked by DHS. States can generate a Status Change Report when logged into DHS’s SAVE program using a web browser (for more information and instructions regarding the Status Change Report, visit: <https://www.uscis.gov/save/current-user-agencies/news-alerts/status-change-report-bi-weekly-data-updates>). States should run this report on a regular basis. This report is limited to cases that were created with a parole-based EAD and does not include cases created with other parole-related documentation, such as Form I-94, Arrival/Departure Record.

Because the immigration status or category of beneficiaries who have been paroled into the U.S. under the CHNV program may have changed, and they may have a new immigration status or category that meets the definition of “qualified alien” or “lawfully residing,” states must reverify the immigration status or category of affected beneficiaries before taking any adverse action (this includes those aliens the state identified as having a parole-based EAD revoked by utilizing the DHS Status Change Report). If a beneficiary’s immigration status or category has changed, the state must apply any other rules that attach to that status – for example, the application of the five-year waiting period that applies to many qualified aliens or an exception from such waiting period.¹⁴ We note that if a state has reverified an alien’s immigration status or category based on the enrollment files that CMS sent to states beginning in August 2025,¹⁵ or if reverification of an alien’s immigration status or category is already underway, no further action is needed.

In accordance with section 1137(d)(3) of the Act and 42 C.F.R. § 435.956 for Medicaid, cross-referenced in part at 42 C.F.R. § 457.380 for CHIP, states must electronically verify the immigration status or category for all individuals who have declared to have a satisfactory immigration status, unless using an approved alternative verification method. In accordance with 42 C.F.R. § 435.916(d) for Medicaid and 42 C.F.R. § 457.343 for CHIP,¹⁶ states must redetermine the eligibility of beneficiaries between regular renewals of eligibility whenever the state receives reliable information or otherwise becomes aware of a change in circumstances.¹⁷ This electronic verification of immigration status or category occurs through use of DHS’s SAVE program.¹⁸

¹² See section 501(e) of the Refugee Education Assistance Act of 1980; 8 U.S.C. § 1641(b)(7); section 1903(v)(5)(B)(iii) of the Act (effective October 1, 2026).

¹³ The CHNV parole programs class of admission (COA) codes are CHP for Cuban Humanitarian Parolee, HHP for Haitian Humanitarian Parolee, NHP for Nicaraguan Humanitarian Parolee, and VHP for Venezuelan Humanitarian Parolee.

¹⁴ See 8 U.S.C. § 1613. For example, when a state determines that a CHNV parolee is classified as a Cuban or Haitian entrant, the state would except such Cuban or Haitian entrant from the five-year waiting period in accordance with 8 U.S.C. § 1613(b)(1)(D).

¹⁵ <https://www.cms.gov/newsroom/press-releases/cms-launches-nationwide-push-remove-ineligible-medicaid-enrollees-uphold-citizenship-requirements>.

¹⁶ See footnote 8.

¹⁷ See 42 C.F.R. § 435.952 (applying to Medicaid) and 42 C.F.R. § 457.380(f) (applying to CHIP).

¹⁸ Section 1137(d)(3) of the Act directs states “to verify with the Immigration and Naturalization Service the individual’s immigration status through an automated or other system (designated by the Service for use with States).”

States can use three pathways to access SAVE: (1) the Federal Data Services Hub (Hub) Verify Lawful Presence (VLP) Service; (2) a direct connection between the state's eligibility system and SAVE; or (3) SAVE's web-based Graphical User Interface (GUI). States can also use a combination of these three SAVE pathways. DHS's SAVE program provides responses based on the most up-to-date data available, including data to accurately reflect the current immigration status or category of the impacted population for new verification requests. SAVE does not update past SAVE verification responses when there is a change in immigration status or category; therefore, states must submit a new SAVE verification request to receive a response based on the most up-to-date data available.

For beneficiaries who the state determines no longer have satisfactory immigration status for full Medicaid or CHIP benefits, states must comply with the requirements at 42 C.F.R. §§ 435.916(f), 457.343,¹⁹ and 457.350 to consider all bases of eligibility (including, in Medicaid, limited Medicaid services necessary to treat an emergency medical condition, often referred to as "emergency Medicaid")^{20,21} and must provide advance notice of an adverse action, including the right to a Medicaid fair hearing or CHIP review,²² before terminating or reducing full Medicaid benefits or CHIP coverage.

We remind states that the loss of satisfactory immigration status impacts availability of benefits for individuals in a continuous eligibility (CE) period or continuous postpartum coverage.²³ This includes children in a CE period under the state plan or section 1115 demonstrations,²⁴ individuals covered during a period of continuous postpartum coverage under the state plan or section 1115 demonstrations,²⁵ and individuals in an expanded CE period under the terms of a section 1115 demonstration.²⁶ Federal matching funds are available for emergency Medicaid coverage for

DHS's U.S. Citizenship and Immigration Services (USCIS) now performs this function. For more information about USCIS and the SAVE program, visit <https://www.uscis.gov/save/about-save/save-governing-laws>. See 42 C.F.R. § 435.956(a) for Medicaid and 42 C.F.R. § 457.380(b)(1)(i) for CHIP.

¹⁹ See footnote 8.

²⁰ For example, a state must consider whether an individual is eligible under the CHIPRA 214 option, if elected in a state plan, or for limited Medicaid services necessary for treatment of an emergency medical condition defined at section 1903(v)(3) of the Act. See section 1903(v)(2) of the Act and 8 U.S.C. § 1611(b)(1)(A).

²¹ CMS reminds states that CMS published a State Medicaid Director (SMD) letter #25-003 on Sept. 30, 2025, available at <https://www.medicaid.gov/federal-policy-guidance/downloads/smd25003.pdf>. This guidance announced a change in the agency's interpretation of section 1903(v) of the Act and how it applies to Medicaid managed care payments to improve program and fiscal integrity in the Medicaid program. As outlined in SMD letter #25-003, for rating periods beginning on or after September 30, 2026, states may only claim FFP for emergency Medicaid either through the FFS delivery system or by contracting with prepaid inpatient health plans and prepaid ambulatory health plans on a non-risk basis to cover only care and services necessary for treatment of an emergency medical condition to aliens ineligible for full Medicaid benefits.

²² See 42 C.F.R. Part 431, Subpart E (applying to Medicaid); 42 C.F.R. §§ 457.340(e) and 457.1130(a) (applying to CHIP).

²³ For more information on the loss of satisfactory immigration status for individuals in a CE period under a state's election of the CHIPRA 214 option, see SHO letter #25-001, available at <https://www.medicaid.gov/federal-policy-guidance/downloads/sho25001.pdf>.

²⁴ Sections 1902(e)(12) and 2107(e)(1)(L) of the Act.

²⁵ Sections 1902(e)(16) and 2107(e)(1)(K) of the Act.

²⁶ CMS reminds states that we do not anticipate approving new state proposals or extending existing state section 1115 demonstration expenditure authority that allow for expanded CE beyond what is required or available under the Medicaid or CHIP statutes. See the July 17, 2025, CMS letter "Section 1115 Demonstration Authority for Continuous Eligibility Initiatives," available at <https://www.medicaid.gov/resources-for-states/downloads/contin-elig-ltr-to-states.pdf>.

Medicaid beneficiaries who have lost satisfactory immigration status for full Medicaid coverage, including those who are in a CE period. We note that in separate CHIPs, because neither 8 U.S.C. § 1611 nor title XXI of the Act authorize a limited benefit for coverage of emergency services for individuals without a satisfactory immigration status in CHIP, states must terminate CHIP eligibility for individuals in a CE period who lose satisfactory immigration status, following required notice and review rights.²⁷

If you have any questions or need additional information, please contact CMCS@cms.hhs.gov.

²⁷ See 42 C.F.R. §§ 457.340(e), 457.1130(a), and 457.1180 (2023). Please note regulation language at 42 C.F.R. § 457.1180 from 2023. To comply with the moratorium enacted by section 71102 of the WFTC legislation, which ends on September 30, 2034, CMS refers to the requirements for timely and adequate written notice of the proposed termination and an opportunity for review at 42 C.F.R. § 457.1180 in effect as of 2023. For more information on the moratorium, see the November 18, 2025, CMCS Informational Bulletin “Working Families Tax Cut” Legislation, Public Law 119-21: Summary of Medicaid and Children’s Health Insurance Program (CHIP) Related Provisions,” available at <https://www.medicaid.gov/federal-policy-guidance/downloads/cib11182025.pdf>.