



MARYLAND DEPARTMENT OF  
HUMAN SERVICES  
Department of Human Services  
311 West Saratoga Street  
Baltimore MD 21201

## FIA INFORMATION MEMO

Control Number: # 24-29

Effective Date: UPON RECEIPT

Issuance Date: 1/11/2024

**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF**

**FROM: AUGUSTIN NTABAGANYIMANA, ACTING EXECUTIVE DIRECTOR**  
**DEBBIE RUPPERT, MDH EXECUTIVE DIRECTOR**

*Augustin*

*Debbie Ruppert*

**RE: CLARIFICATION ON ELIGIBILITY FOR NEW PAROLEES FROM AFGHANISTAN AND UKRAINE**

**PROGRAMS AFFECTED: REFUGEE CASH ASSISTANCE (RCA)**  
**REFUGEE MEDICAL ASSISTANCE (RMA)**  
**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)**  
**TEMPORARY CASH ASSISTANCE (TCA)**  
**MEDICAID (MA)**

**ORIGINATING OFFICE: OFFICE OF PROGRAMS**

### SUMMARY

The purpose of this Information Memo (IM) is to clarify eligibility regarding newly paroled individuals from Afghanistan, referred to as Afghan Humanitarian Parolees (AHPs), and from Ukraine, referred to as Ukrainian Humanitarian Parolees (UHPs). This IM does not relay any new policies related to eligibility for benefits and services for these populations, but rather serves to clarify eligibility parameters established in FIA Action Transmittals (AT) [22-24](#) and [24-11](#) regarding newly arrived UHPs and AHPs, respectively, based on federal guidance.

The Afghanistan Supplemental Appropriations Act 2022 and the Additional Afghanistan Supplemental Appropriations Act 2022 provided appropriations for certain citizens or nationals of Afghanistan to receive benefits and services available to refugees. This information is outlined in AT 24-11. The Additional Ukraine Supplemental Appropriations Act 2022 provided certain citizens or nationals of Ukraine and other non-Ukrainian individuals specific

appropriations to receive refugee and public assistance benefits (SNAP, TCA, MA) and services as outlined in AT 22-24.

Humanitarian Parole is defined as temporary permission to enter the United States for urgent humanitarian reasons or significant public benefit. Federal guidance dictates that **Afghan and Ukrainian Humanitarian Parolees must have entered the United States with parole by September 30, 2023, in order to be eligible for benefits and services**, including resettlement services funded by the Maryland Department of Human Services’ (MDHS), Maryland Office for Refugees & Asylees (MORA), and its network of Public/Private Partnership (PPP) providers, such as Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA). However, certain relatives of AHPs and UHPs, as described below, continue to be eligible for benefits and services whether they enter the United States with parole before or after September 30, 2023. This guidance has no effect on Afghan or Ukrainian nationals currently or previously enrolled in programs or paroled before September 30, 2023.

Until there is additional federal guidance to extend eligibility for newly arrived AHP and UHP primary applicants and their families, Local Departments of Social Services (LDSS) must follow the eligibility criteria described below related to these populations.

### **Afghan Parolee Eligibility**

As described in AT 24-11 and ORR PL 22-01, certain Afghan nationals are eligible for benefits and services if they were paroled into the U.S. between July 31, 2021, and September 30, 2023. AHPs who enter the U.S. outside of that timeframe may not be eligible for benefits and services, unless they are the relatives of previously paroled ORR-eligible AHPs, as described below:

- Spouses **or** children of ORR-eligible Afghan parolees who entered the U.S. between July 31, 2021, and September 30, 2023, as defined in section 101(b) of the Immigration and Nationality Act (INA) ([8 U.S.C. § 1101\(b\)](#)).
- Parent(s) **or** legal guardian(s) of ORR-eligible unaccompanied children paroled into the U.S. between July 31, 2021, and September 30, 2023, as defined in [6 U.S.C. § 279\(g\)\(2\)](#).

Please see the chart below which describes these eligibility requirements:

ORR-eligible Afghan Parolees		Eligibility Requirements
Primary Applicant		<ul style="list-style-type: none"> <li>• Afghan citizen or national</li> <li>• Entered U.S. with parole between July 31, 2021 – September 30, 2023.</li> </ul>
Relative	Spouse <b>or</b> child	<ul style="list-style-type: none"> <li>• Meets the definition of “spouse or child” of an ORR-eligible Afghan parolee per INA § 101(b) (<a href="#">8 U.S.C. § 1101(b)</a>).</li> <li>• Entered/enters U.S. with parole before or after</li> </ul>

		September 30, 2023.
Relative	Parent <b>or</b> legal guardian of unaccompanied child	<ul style="list-style-type: none"> <li>• Parent or legal guardian of an unaccompanied child parolee from Afghanistan who meets the definition in <a href="#">6 U.S.C. § 279(g)(2)</a>.</li> <li>• Entered/enters U.S. with parole before or after September 30, 2023.</li> </ul>

Other ORR-immigration categories that are eligible for benefits and services and are exempt from the 5-year bar include refugees, Special Immigrant Visa (SIV or SI) holders, and/or asylees (including those who adjust from AHP to asylee status, though not those who applied but have not yet been granted asylum). If an Afghan national meets any of these criteria, they are not required to enter within a particular time frame, nor is the duration of their eligibility affected by their immigration status or category.

### Ukrainian Parolee Eligibility

As described in AT 22-24 and ORR PL 22-13, certain Ukrainian nationals and non-Ukrainian individuals who last habitually resided in Ukraine are eligible for benefits and services if they were paroled into the U.S. between February 24, 2022, and September 30, 2023. UHPs who arrive outside of the above timeframe are not necessarily eligible for benefits and services, even if they are travel-authorized through the federal Uniting for Ukraine (U4U) parole program, unless they are the relatives of previously paroled ORR-eligible UHPs, as described below:

- Spouses **or** children of ORR-eligible Ukrainian parolees who entered the United States with parole between February 24, 2022, and September 30, 2023, as defined in section 101(b) of the INA ([8 U.S.C. § 1101\(b\)](#)).
- Parent(s) **or** legal guardian(s) **or** primary caregiver(s) of ORR-eligible unaccompanied children from Ukraine who entered the U.S. with parole between February 24, 2022, and September 30, 2023, as defined within [6 U.S.C. § 279\(g\)\(2\)](#).

Please see the chart below, which describes these eligibility requirements:

ORR-eligible Ukrainian Humanitarian Parolees	Eligibility Requirements
Primary Applicant	<ul style="list-style-type: none"> <li>• Ukrainian citizen or national <b>or</b> non-Ukrainian who last habitually resided in Ukraine paroled through the Uniting for Ukraine program.</li> <li>• Entered U.S. with parole between February 24, 2022 - September 30, 2023.</li> </ul>

Relative	Spouse or child	<ul style="list-style-type: none"> <li>Meets the definition of “spouse or child” of an ORR-eligible Afghan parolee per INA § 101(b) (<a href="#">8 U.S.C. § 1101(b)</a>).</li> <li>Entered/enters U.S. with parole before or after September 30, 2023.</li> </ul>
Relative	Parent or legal guardian or primary caregiver of unaccompanied child	<ul style="list-style-type: none"> <li>Parent or legal guardian of an unaccompanied child parolee from Afghanistan who meets the definition in <a href="#">6 U.S.C. § 279(g)(2)</a>.</li> <li>Entered/enters U.S. with parole before or after September 30, 2023.</li> </ul>

Ukrainian nationals who have another ORR-eligible immigration status or category, such as refugees or asylees (including those who adjust from UHP to asylee status, but not those who applied but have not yet been granted asylum), are eligible for benefits and services in the standard manner as refugee populations and are not required to enter within a particular timeframe, nor is the duration of their eligibility affected by their immigration status or category.

Afghan and Ukrainian Humanitarian Parolees who do not meet the eligibility criteria above and enter after September 30, 2023, will be subject to the same eligibility requirements for mainstream non-refugee programs (such as SNAP, TCA, and MA) as qualified immigrants paroled into the U.S., if they have been paroled into the U.S. for at least one year. Parolees are otherwise not eligible for refugee benefits and services (including RCA and RMA) unless determined as such by ORR. This means that new Afghan and Ukrainian HPs will be subject to the same requirements as HPs coming in from other countries who do not have refugee exemptions to the 5-year bar (Venezuela, Nicaragua, Russia, others).

LDSS eligibility caseworkers must take the following steps prior to enrollment in programming:

- Screen all Afghan and Ukrainian customers for an accurate immigration status, including both a SAVE verification and review of immigration documents.
- Customers verified as AHPs or UHPs must be screened to determine if they meet the eligibility guidelines above, such as family ties to existing AHPs/UHPs.

For additional information on refugee and immigrant eligibility criteria for resettlement services, see ORR [PL 16-01](#) and the accompanying [Status and Documentation Guide](#) and [FAQ](#).

**INQUIRIES:**

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#) found on Knowledge Base or via email at [fia.policy@maryland.gov](mailto:fia.policy@maryland.gov) for Montgomery County only. Contact [MORA](#) for additional information about refugee policies.

cc: DHS Executive Staff

MDH Executive Staff  
FIA Management Staff  
Constituent Services  
DHS Help Desk  
Office of Administrative Hearings