FAMILY INVESTMENT ADMINISTRATION

Policy Number:	25-17
Policy Title:	Reduction of RCA and RMA Eligibility Period
Release Date:	June 13, 2025
Effective Date:	May 5, 2025
Approved By:	Augustin Ntabaganyimana, Executive Director Family Investment Administration
Revision Date(s):	Not applicable
Supersedes:	FIA Action Transmittal (AT) #22-23 Expansion of RCA and RMA Eligibility Period (released May 20, 2022)
Originating Office:	Office of Programs fia.policy@maryland.gov
Required Actions:	Reduces the eligibility period for the Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA) programs from 12 to 4 months for customers with a federally verified date of eligibility (date of entry into the U.S. or USCIS status date) on or after May 5, 2025.
Key Words:	Refugee Cash Assistance, Refugee Medical Assistance
Related Federal Law:	Not Applicable
Related State Laws:	Not Applicable
COMAR	<u>07.03.03.10</u>
State Plan Implications?	No



Department of Human Services 25 S Charles Street Baltimore MD 21201

FAMILY INVESTMENT ADMINISTRATION (FIA) ACTION TRANSMITTAL

Effective Date: May 5, 2025

Issuance Date: June 13, 2025

Control Number: #25-17

TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS)

DIRECTORS, LDSS DEPUTY/ASSISTANT DIRECTORS FOR

FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS AND

ELIGIBILITY STAFF

FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR

RE: REDUCTION OF RCA AND RMA ELIGIBILITY PERIOD

PROGRAM AFFECTED: REFUGEE CASH ASSISTANCE (RCA)
REFUGEE MEDICAL ASSISTANCE (RMA)

Summary

The United States Department of Human Services (HHS), Office of Refugee Resettlement (ORR) announced (<u>Dear Colleague Letter (DCL) 25-13</u>) a reduced eligibility period for federal Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA) programs. Starting **May 5, 2025**, newly eligible enrollees in RCA and RMA are eligible for a maximum of 4 months. The RCA and RMA eligibility period begins on the date the individual receives a qualifying status, such as their date of entry into the U.S. or the date of their asylum grant. Individuals who became eligible before May 5, 2025, are not affected by this change and remain eligible for up to 12 calendar months.

The Maryland Office for Refugees and Asylees (MORA) administers RCA and RMA benefits in collaboration with Local Departments of Social Services (LDSS) as well as through its Public/Private Partnership (PPP) with local Resettlement Agency (RA) affiliates. RCA and RMA help refugees and certain immigrants who are ineligible for other federal forms of financial and medical assistance meet their most basic needs while they endeavor to become self-sufficient.

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RMA provides short-term medical assistance to refugee populations new to the U.S. who are ineligible to receive Medicaid (MA) because their income exceeds MA income standards. For customers whose date of eligibility for ORR benefits is on or after May 5, 2025, such benefits will last up to 4 calendar months from the date they obtain an ORR-eligible status. RMA eligibility is determined by staff at LDSS offices in the statewide MDThink Eligibility and Enrollment (E&E) system after customers are deemed ineligible for MA in the Maryland Health Connection (MHC) system.

RCA provides short-term financial assistance to newly arrived refugees who are ineligible for Temporary Cash Assistance (TCA) or any other forms of federal financial assistance program. Customers may have their eligibility for RCA determined and be enrolled in the program based on where they reside:

- Customers who reside within established PPP jurisdictions in Maryland where local RA affiliate offices are located (Baltimore City, Baltimore County, Frederick County, Montgomery County, and Prince George's County) should enroll through local RA affiliates. Through this program, customers will receive integrated, culturally-sensitive, and linguistically appropriate Refugee Support Services (RSS), including employability assistance for non-exempt customers to become self-sufficient, as well as other forms of comprehensive assistance.
- Customers who reside outside of the PPP jurisdictions described above may have their eligibility determined by staff at LDSS offices.

All other RCA and RMA program policies, technical and financial eligibility requirements remain unchanged.

This change has no effect on eligibility for any other programs, such as TCA, Medicaid, or the Supplemental Nutrition Assistance Program (SNAP).

Required Action

Effective on May 5, 2025, customers who enter the U.S. or obtain a qualified immigration status on or after this date are subject to the reduced RCA and RMA eligibility. Their certification period will be 4 calendar months or less. The eligibility period is calculated from the date customers become eligible for these benefits, based on the list of eligible immigration statuses below:

A. **Refugees** - Date of entry into the U.S. as indicated on their I-94 arrival record issued by U.S. Department of Homeland Security (DHS), or their arrival letter issued by the U.S. Department of State (DOS).

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- B. **Asylees** Date of asylum grant by a federal authority, such as federal Immigration Court or USCIS, or for follow-to-join asylee family members their date of entry into the U.S. as indicated on their I-94 arrival record.
- C. **Afghan Special Immigrant Visa (SIV) Holders** Date of entry into the U.S. as indicated on the arrival record or stamp in their foreign passport with a Special Immigrant (SI or SQ) category visa.
- D. **Cuban or Haitian Entrants** Date of grant of parole or entry into the U.S. (including those who entered with parole which has since expired, or those who entered without parole but are the subject of removal, deportation, exclusion proceedings with no final order of removal) as indicated on their I-94 arrival record or USCIS paperwork indicating release; or date of asylum application (for those who entered without parole or and have no other status but their asylum is pending).
- E. **Victims of Trafficking (VOT)** Date of VOT certification by DHHS, or the date a family member of a VOT was granted derivative status, date of USCIS notice granting T-visa (for those already in the U.S.), or date of admission on their passport or arrival record (for those who entered the U.S. with a T-visa).

Case managers must confirm that a customer is ineligible for MA in MHC and E&E due to overscale income before enrollment in RMA.

Case managers must confirm that customers are ineligible for TCA before enrollment in RCA. They must also confirm during the interview that the applicant is not already enrolled in RCA through a local RA. The following factors must be considered in determining eligibility:

- Household composition: Most customers eligible for RCA are single adults or married couples who do not have minor children and are pregnant. Most newly arrived refugee families are eligible for TCA unless their income exceeds the income limit. Families with children must be determined ineligible for TCA due to overscale income prior to being enrolled in RCA.
- 2. Education status: Full-time students enrolled in institutions of higher education are ineligible for RCA benefits.
- 3. Income: RCA income standard is 200% FPL, which is higher than TCA income standards.
- 4. Jurisdiction: If an applicant resides in one of the following jurisdictions, the case manager must determine if they are connected to one of the local RA affiliates below and refer them for RCA enrollment accordingly:
 - a. Baltimore City: International Rescue Committee (IRC) in Baltimore

- b. Baltimore County: Lutheran Social Services of the National Capital Area (LSSNCA) in Arbutus
- c. Frederick County: LSSNCA Frederick
- d. Montgomery County: IRC Silver Spring or the Ethiopian Development Council (ECDC) in Silver Spring
- e. Prince George's County LSSNCA in Greenbelt
- f. Customers in Anne Arundel, Carroll, Harford, and Howard Counties may also be referred to either IRC Baltimore or LSSNCA.
- g. If the LDSS office is outside of one of the PPP jurisdictions above, the customer may be enrolled into RCA via E&E.

Case managers must ensure that if a customer's household composition or income changes within the certification period or they are no longer within the eligibility guidelines described above, the case will be closed in a timely manner. The RCA section of the TCA policy manual and E&E system are being updated to reflect this change.

References

Federal Register Notice by the Children and Families Administration (3/21/25) 45 CFR 400.53 General Eligibility Requirements

ORR DCL 25-13 Reduction of the RCA and RMA Eligibility Period (3/28/25)

ORR DCL 22-01 Increase in PPP RCA Monthly Payment Ceilings (10/01/21)

ORR PL 16-01 Documentation Requirements for the Refugee Resettlement

<u>Program</u> with <u>Documentation Guide</u>

AT 25-12 TCA TDAP RCA Benefit Increase (2/27/25)

AT 25-09 Revised Ukrainian Humanitarian Parolee Eligibility (2/23/25)

AT 24-10 Clarification of Cuban/Haitian Entrant Eligibility for Benefits (8/16/23)

TCA Manual Section 1308 Refugee Assistance (Updated May 2025)

Inquiries

Please direct policy questions to FIA Policy by completing the <u>FIA Policy Information Request Form</u>. Montgomery County staff may submit their policy questions via email at <u>fia.policy@maryland.gov</u>. Contact or visit the website for <u>MORA</u> for questions related to refugee policies.

cc: DHS Executive Staff
Constituent Services

DHS Help Desk

FIA Management Staff

Office of Administrative Hearings

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