



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

FIA ACTION TRANSMITTAL

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

FROM: LA SHERRA AYALA, EXECUTIVE DIRECTOR

RE: EXPANSION OF RCA & RMA ELIGIBILITY PERIODS

**PROGRAMS IMPACTED: REFUGEE CASH ASSISTANCE (RCA)
 REFUGEE MEDICAL ASSISTANCE (RMA)**

ORIGINATING OFFICE: OFFICE OF OPERATIONS

SUMMARY:

The United States Department of Human Services (DHHS), Office of Refugee Resettlement (ORR) has announced the expansion of the eligibility period for Refugee Cash Assistance (RCA), and Refugee Medical Assistance (RMA) from 8 months to 12 months from the date of refugee populations receiving an eligible status for federal benefits. As described in ORR [Dear Colleague Letter 22-12](#), ORR-eligible customers must have a date of eligibility (also called date of entry or arrival) on or after October 1, 2021 to qualify. This change affects all active and future customers enrolled in the RCA, and RMA programs, and will be in effect immediately. Customers with the earliest eligibility dates for this change (October 2021) will be able to begin to receive their four additional months of financial and/or medical assistance in June 2022. All other RCA and RMA program policies remain in effect. Please see the descriptions below of the RCA and RMA programs as well as all technical and financial eligibility requirements.

RMA provides short-term medical assistance to newly arriving refugee populations to the U.S. who are ineligible to receive Medicaid (MA), with comparable benefit levels. As of this change, such benefits last up to 12 calendar months from the date a client obtains an ORR-eligible status. In addition to providing access to healthcare while customers begin to rebuild their lives, RMA enables refugees and other ORR-eligible populations to complete required medical screenings upon arrival in the U.S. with federal funding through the DHS Maryland Office for Refugees and

Asylees (MORA) Refugee Medical Screening (RMS) program, in partnership with the Maryland Department of Health (MDH), and local Federally Qualified Health Centers (FQHCs).

RCA benefits help ORR-eligible refugee families meet their most basic needs while they achieve economic self-sufficiency. Funded through ORR's Cash and Medical Assistance (CMA) grant, most RCA benefits are administered in Maryland by DHS/MORA through a Public-Private Partnership (PPP) with local Resettlement Agency (RA) affiliates under the Refugee Transitional Cash Assistance (RTCA) program. Customers within the established PPP jurisdictions in Maryland (the Suburban Washington Area, Baltimore City and surrounding counties, and Frederick County) may access benefits through RA partners in these locations, while customers outside these jurisdictions may apply directly at Local Departments of Social Services (LDSS). RCA customers are encouraged to access RAs for benefits as well as other support services, such as employment assistance, vocational training, and case management. RCA payment levels are aligned with Temporary Cash Assistance (TCA), Maryland's Temporary Assistance for Needy Families (TANF) program. Customers must be ineligible for TANF and other forms of federal financial assistance prior to enrollment in RCA.¹

Criteria for Dates of Eligibility:

The non-exhaustive list below includes eligible populations for RCA and RMA benefits, including primary applicants, and family members, with corresponding dates of eligibility. Dates of eligibility are based on the date a client receives an ORR-eligible status and may vary for different customers depending on their immigration status, as described below:

- Refugees - Date of arrival or entry into the U.S. as indicated on the I-94 arrival record.
- Asylees - Date of asylum grant by federal authority, such as federal Immigration Court or Department of Homeland Security.
- Cuban/Haitian Entrants/Parolees - Date of grant of parole, or date of entry to the U.S.
- Victims of Trafficking (VOT) - Date of VOT certification by DHHS.
- Family member of a VOT - Date of USCIS notice granting derivative T status (for those already in the U.S.), or date of admission stamped on that individual's passport or I-94 arrival record (for those who entered the U.S. with a T visa).
- Afghan or Iraqi Special Immigrant Visa (SIV) holders, parolees, or Conditional Permanent Residents (CPR) - Date of entry into the U.S. or date of SIV issuance.
- Afghan SIV or SI/SQ Parolees evacuated to a Safe Haven (military base) - Date of departure from the Safe Haven or date of entry into the community.
- Afghan Humanitarian Parolees (AHPs, or non-SI parolees) - Later of October 1, 2021 or date of departure from the Safe Haven/entry into the community.

The certification time period for RCA and RMA benefits is calculated based on the first 12 calendar months from the date of eligibility, as verified on the customer's immigration documents. A full list of allowable populations and documents is available in the ORR

¹ Per 45 CFR § 400.53, customers must be ineligible for the following federal financial assistance programs prior to enrollment in RCA: TANF; Social Security Income (SSI); Old Age Assistance (OAA); Aid to the Blind (AB); Aid to the Permanently and Totally Disabled (APTD); Aid to the Aged, Blind, and Disabled (AABD); and Matching Grant (MG - administered by ORR through RA affiliates).

[Documentation Guide](#) as well as [ORR Policy Letter 22-02](#) regarding new Afghan populations.

REQUIRED ACTION:

- Case managers must confirm customers are ineligible for Medicaid before enrollment in RMA. This is usually due to customer income exceeding the MA threshold (130% of the Federal Poverty Limit, FPL), but within the higher RMA limits (200% of the FPL).
- Case managers must confirm that customers are ineligible for TCA before enrollment in RCA, as households cannot receive both forms of assistance in the same period. The following factors should also be considered in eligibility determinations:
 - Household composition: Most customers eligible for RCA are single or married adults without children, and not pregnant, as most newly-arrived refugee families are usually eligible for TANF unless they exceed income limits. Families with children must be determined ineligible for TCA prior to being enrolled into RCA.
 - Education status: Full-time students enrolled in institutions of higher education are ineligible for RCA benefits.
 - Income: While TCA limits income to 130% of the FPL, RCA has a 200% threshold.
 - If a TCA applicant or active customer meets technical eligibility, but not financial eligibility for TCA, the case worker should refer them to a local RA affiliate for enrollment into the RTCA program. If the LDSS office is outside of the PPP jurisdiction, the customer may be enrolled into RCA.
- Case managers must ensure that if a customer's household composition or income changes within the 12 month certification period and they are no longer within the eligibility guidelines described above, the case is closed in a timely manner.
- While the E&E system is being updated to automatically ensure the recertification period and end date for both RCA and RMA benefits is 12 calendar months from a customer's date of eligibility, case managers must manually ensure the end date is accurate until such changes are updated in the system.
 - The E&E system release with RCA and RMA enhancements is expected 6/1/2022.

Staff should let MORA know of any RMA enrollments to ensure accurate reporting to federal funders by contacting MORA Director Myat Lin at Myat.Lin@maryland.gov, and Program Manager Yana Cascioffe at Yana.Cascioffe@maryland.gov.

NOTE: This policy change affects all current and future customers enrolled in the RCA and RMA programs and must be shared and discussed with all appropriate staff.

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. Contact the [Maryland Office for Refugees and Asylees](#) for additional information about refugee policies.

For systems questions, please email fia.bsdm@maryland.gov.

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