

MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

NOTICE OF PROPOSED POLICY

Public Act 280 of 1939, as amended, and consultation guidelines for Medicaid policy provide an opportunity to review proposed changes in Medicaid policies and procedures.

Please review the policy summary and the attached materials that describe the specific changes being proposed. Let us know why you support the change or oppose the change.

Submit your comments to the analyst by the due date specified. Your comments must be received by the due date to be considered for the final policy bulletin.

Thank you for participating in the consultation process.



Director, Bureau of Policy and Strategic Engagement
Health Services Administration

Project Number: 2615-Eligibility	Comments Due: June 22, 2026	Proposed Effective Date: October 1, 2026
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Policy Subject: H.R.1 Legislation – Section 71109 Alien Medicaid Eligibility Changes

Affected Programs: Medicaid, Children's Health Insurance Program (CHIP)

Distribution: All Providers, Bridges Eligibility Manual (BEM) Holders

Policy Summary: Due to the changes imposed by Section 71109 of the H.R.1 legislation, the alien statuses that are eligible to receive full Medicaid coverage will now be restricted to legal permanent residents, Cuban and Haitian entrants, and Compacts of Free Association (COFA) migrants.

Purpose: These changes are required to be in compliance with the federal H.R.1 legislation.

Proposed Policy Draft

Michigan Department of Health and Human Services
Health Services

Distribution: All Providers, Bridges Eligibility Manual (BEM) Holders

Issued: September 1, 2026 (proposed)

Subject: H.R.1 Legislation - Section 71109 Alien Medicaid Eligibility Changes

Effective: October 1, 2026 (proposed)

Programs Affected: Medicaid, Children's Health Insurance Program (CHIP)

NOTE: Implementation of this policy is contingent upon approval of a State Plan Amendment (SPA) by the Centers for Medicare & Medicaid Services (CMS)

Section 71109 of H.R.1 of 2025 makes changes to the alien statuses eligible to receive full Medicaid coverage. As of October 1, 2026, the only immigration statuses that will be able to receive full coverage, either immediately upon entry into the United States or by meeting the five-year bar, are:

- Legal permanent residents,
- Cuban and Haitian entrants, and
- Compacts of Free Association (COFA) migrants.

Individuals with any other immigration status will be restricted to emergency services only (ESO) coverage no matter how long they legally reside in the United States.

Note: Michigan previously elected to provide coverage under Section 214 of the Children's Health Insurance Program Reauthorization Act of 2009 (CHIPRA) to pregnant individuals and children under age 21 who are legally residing in the United States. This coverage is not affected by the changes made by H.R.1. This means that pregnant individuals and children under the age of 21 will still be able to receive full coverage as outlined in bulletin [MMP 24-20](#).