

NUMBER

#26-21-01

DATE

January 20, 2026

OF INTEREST TO

County Directors

Social Services Supervisors and
Staff

Financial Assistance Supervisors
and Workers

Tribal Chairpersons and Tribal
Health Directors

Navigators, Certified
Application Counselors, and
Brokers

ACTION/DUE DATE

Policies in this bulletin are
effective August 11, 2025.

EXPIRATION DATE

January 20, 2028

DHS Provides Policy Changes and Clarifications for Continuous Medical Assistance Eligibility for Children

TOPIC

Continuous Medical Assistance (MA) eligibility for children.

PURPOSE

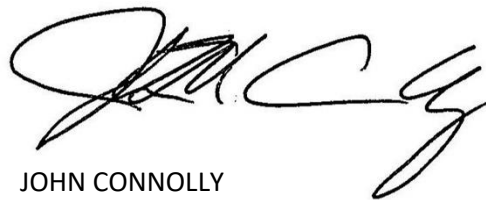
This bulletin provides policy changes and clarifications for continuous MA eligibility for children that are effective August 11, 2025.

CONTACT

Counties and Tribal agencies can submit policy questions via HealthQuest. All others can direct questions to:

Health Care Eligibility and Access Division
PO Box 64989
540 Cedar Street
St. Paul, MN 55164-0989

SIGNED



JOHN CONNOLLY
Deputy Commissioner
Department of Human Services

TERMINOLOGY NOTICE

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.

I. Background

On December 20, 2023, the Minnesota Department of Human Services (DHS) issued Bulletin #23-21-27 establishing 12 months of continuous Medical Assistance (MA) eligibility to children under age 19, effective January 1, 2024. On November 22, 2024, DHS issued [Bulletin #24-21-11](#) expanding continuous MA eligibility to children through age 6 and extending 12 months of continuous eligibility to children ages 19 and 20, effective January 1, 2025.

The policy changes and clarifications in this bulletin were developed in response to questions from county and Tribal eligibility workers, as well as guidance issued by the Center for Medicaid & Medicare Services (CMS).

II. Continuous Eligibility Policy Changes

The following continuous MA eligibility for children policy changes are effective August 11, 2025, due to guidance issued by CMS.

A. Immigration Status Changes

Previously, when a child under age 21 was on MA and experienced an immigration status change that caused the child to no longer meet the definition of lawfully present (see Eligibility Policy Manual [EPM] [Appendix H](#)), the child remained continuously MA eligible until their next annual eligibility renewal.

Beginning August 11, 2025, when a child under age 21 is on MA and experiences an immigration status change that causes the child to no longer meet the definition of lawfully present, the child must be moved to Emergency Medical Assistance (EMA) for the remainder of their continuous eligibility period with advance 10-day notice. In addition to EMA, determine in the Minnesota Eligibility Technology System (METS) if the child qualifies for state-funded MinnesotaCare if they are under age 18. Refer to Bulletins [#24-21-10](#) and [#25-21-05](#) for more information about MinnesotaCare.

B. Home and Community-Based Services (HCBS) Waiver Eligibility

Previously, a child enrolled in MA and on a Home and Community-Based Services (HCBS) waiver remained eligible for MA under the disability basis throughout their continuous eligibility period. This was the case even if the child was no longer certified disabled by the Social Security Administration or the State Medical Review Team, or no longer met level of care requirements.

Beginning August 11, 2025, a child enrolled in MA and on an HCBS waiver must be moved to their age-related MA basis of eligibility if they:

- no longer qualify for the waiver due to loss of their disability status, or
- no longer meeting level of care requirements.

III. Continuous Eligibility Policy Clarifications

The following continuous MA eligibility for children policy clarifications are effective August 11, 2025.

A. Pregnancy

A child under age 21 who becomes pregnant while enrolled in MA must be moved to the pregnancy basis of eligibility. This must occur the first day of the month of conception, but no earlier than three months prior to the month of application or initial MA eligibility determination. The child remains continuously eligible under the pregnancy basis through the end of the postpartum period.

Prior to the end of the postpartum period an MA eligibility redetermination must be completed. If the child is determined eligible for MA for the month after the postpartum period, the child is continuously MA eligible until their next annual eligibility renewal, unless an exception to continuous eligibility occurs. (Refer to the bulletins linked in the [Background](#) section for more information on continuous eligibility exceptions.)

B. When Disability Certification Ends

A child enrolled in MA under a disability basis of eligibility who is no longer certified disabled by the Social Security Administration or the State Medical Review Team must be moved to their appropriate age-related MA basis of eligibility for the remainder of their continuous eligibility period with 10-day advance notice. If the child was excluded from enrollment in a managed care plan due to a disability certification, that exclusion no longer applies. The child must enroll in a prepaid medical assistance program (PMAP) unless they meet another managed care exclusion reason.

C. Long-Term Care and Medical Spenddowns

If a child is newly applying for MA and payment of long-term care, or is enrolled in MA and enters a long-term care facility in the same month as their annual renewal, the agency must first determine whether the child is or continues to be eligible for MA with or without a medical spenddown.

- If the child qualifies for MA without a medical spenddown, the child has continuous MA eligibility and:
 - A long-term care spenddown can be imposed during the facility stay.
 - A medical spenddown cannot be imposed after discharge from the facility.
 - The child remains continuously eligible for the remainder of the MA certification period after discharge, unless a continuous eligibility exception occurs.
- If the child qualifies for MA with a medical spenddown, the child does not have continuous MA eligibility and:
 - A long-term care spenddown can be imposed during the facility stay.

- A medical spenddown can be imposed after discharge from the facility.
- The child does not remain continuously eligible for the remainder of the certification period after discharge, and eligibility workers must redetermine eligibility under all MA bases. If ineligible for MA, the child may qualify for other Insurance Affordability Programs including MinnesotaCare.

IV. Action Required

County and Tribal eligibility workers must follow the policies outlined in this bulletin and instructions issued in advance of, and following, the publication of this bulletin.

V. Legal Authority

CMS State Health Official Letter #25-001 RE: Section 5112 Requirement for all States to Provide Continuous Eligibility to Children in Medicaid and CHIP under the Consolidated Appropriations Act, 2023

Minnesota Statutes, section 256B.056, subdivision 7

Americans with Disabilities Act (ADA) Advisory

This information is available in accessible formats for people with disabilities by calling 651-297-3862 or toll free at 800-657-3672 or by using your preferred relay service. For other information on disability rights and protections, contact the agency's ADA coordinator.