

DHS Bulletin #26-21-08: DHS Announces Six-Month Eligibility Renewals for Certain Adults Enrolled in MA or EMA

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- Announced policy and implementation of a new federal requirement that eligibility renewals for Medical Assistance (MA) and Emergency Medical Assistance (EMA) occur every six months instead of every 12 months for people enrolled in these programs under the adults without children basis of eligibility.
- Section 71107 of Public Law 119-21, also know as H.R.1 and the One Big Beautiful Bill Act (OBBBA), enacted on July 4, 2025.

Six-Month Eligibility Renewals Policy

- Policy goes into effect on January 1, 2027
- American Indians and Native Alaskans eligible for MA or EMA with an adults without children basis of eligibility are exempt and their eligibility will continue to be renewed every 12 months.
- People eligible for MA or EMA under all other bases of eligibility are not subject to six-month eligibility renewals and their eligibility will continue to be renewed every 12 months.
- People whose eligibility is renewed every six months are exempt from periodic data matching.

Adults Without Children Basis of Eligibility

- Centers for Medicare and Medicaid Services (CMS) directive: Adults without children basis of eligibility must include people who are ages 19 and 20.
- People who are ages 19 and 20 who do not qualify for MA under the adults without children basis of eligibility because they do not meet the new work requirements must be evaluated for MA under the children ages 19 & 20 basis of eligibility.
- Criteria for adults without children basis of eligibility:
  - Is ages 19 through 64
  - Is not entitled to or enrolled in Medicare Part A or enrolled in Medicare Part B
  - Is not a Supplemental Security Income (SSI) recipient
  - Is not a former SSI recipient who stopped receiving SSI when they began receiving Retirement, Survivors, and Disability Insurance (RSDI) benefits from the Social Security Administration (SSA) under a deceased spouse or deceased or retired parent's earning record,
  - Is not eligible for MA under Section 1619(a) or (b) of the Social Security Act, and
  - Is not enrolled in MA under the parent, caretaker relative, pregnant person, former foster care youth or disability bases of eligibility

Six-Month Eligibility Renewals Process

- The six-month eligibility renewals will follow the same process as 12-month eligibility renewals.
  - For most adults without children enrolled in MA, DHS will continue to conduct ex-parte renewals to try to renew eligibility using information in the case file and trusted electronic data. If eligibility cannot be automatically renewed, DHS will send enrollees a prepopulated renewal form to complete and return.
  - For adults without children enrolled in EMA, DHS will send enrollees a renewal form to complete and return 45 days before the renewal month.
- Six-month eligibility renewals also have a four-month reconsideration period if a person's eligibility ends for failure to renew.

Implementation of Six-Month Eligibility Renewals

- When this new requirement impacts applicants and existing enrollees will vary based on different factors.
- For applicants, the impact will vary depending whether there are members of their household on an active health care case.
- For existing enrollees, the impact will vary depending on their renewal cohort and the system in which their eligibility is administered.

Applicants with No Household Members on an Active Health Care Case

- Adults without children who apply on or after January 1, 2027, who do not have any household members on an active health care case, are not American Indians or Alaska Natives, and qualify for MA or EMA are subject to six-month eligibility renewals.
- Six-month eligibility period begins the month they applied and ends five months later.
- Will have an eligibility renewal every six months.

Renewal Schedule for Applicants with No Household Members on an Active Health Care Case

Month of application	Initial period of eligibility	First renewal month	Next eligibility period, if renewed	Next renewal month
January 2027	1/1/2027 – 6/30/2027	July 2027	7/1/2027 – 12/31/2027	January 2028
February 2027	2/1/2027 – 7/31/2027	August 2027	8/1/2027 – 1/31/2028	February 2028
March 2027	3/1/2027 – 8/31/2027	September 2027	9/1/2027 –2/29/2028	March 2028
April 2027	4/1/2027 – 9/30/2027	October 2027	10/1/2027 – 3/31/2028	April 2028
May 2027	5/1/2027 – 10/31/2027	November 2027	11/1/2027 – 4/30/2028	May 2028
June 2027	6/1/2027 – 11/30/2027	December 2027	12/1/2027 – 5/31/2028	June 2028
July 2027	7/1/2027 – 12/31/2027	January 2028	1/1/2028 – 6/30/2028	July 2028
August 2027	8/1/2027 – 1/1/2028	February 2028	2/1/2028 – 7/31/2028	August 2028
September 2027	9/1/2027 – 2/29/2028	March 2028	3/1/2028 – 8/31/2028	September 2028
October 2027	10/1/2027 – 3/31/2028	April 2028	4/1/2028 – 9/30/2028	October 2028
November 2027	11/1/2027 – 4/30/2028	May 2028	5/1/2028 – 10/31/2028	November 2028
December 2027	12/1/2027 – 5/31/2028	June 2028	6/1/2028 – 11/30/2028	December 2028

Example: Applicants with No Household Members on an Active Health Care Case

- Sam, age 30, and Kai, age 32, are a married couple without children. Neither are on an active health care case. They submit an online application on April 23, 2027, are both approved for MA for adults without children.
- Their six-month eligibility period begins April 1, 2027, and ends September 30, 2027.
- Their first renewal is scheduled for October 2027.

The Person or Other Members Have an Active Health Care Case

- Adults without children approved for MA or EMA on an active health care case on and after January 1, 2027:
  - If MA or EMA is approved before the ex parte renewal process initiates for the next six-month eligibility period, the person will have a renewal within the first six months of eligibility.
  - If the MA or EMA approval occurs after the renewal was initiated, the individual's first renewal will be at the end of the second six-month eligibility period.

Example: The Person or Other Members Have an Active Health Care Case

- Tracy, age 25, is on a health care case with her spouse, Taylor, age 23. Tracy does not have MA coverage because she has health insurance through her employer. Taylor is enrolled in MA for adults without children and has an MA renewal scheduled for December 2027.
- Tracy and Taylor contact their servicing agency in January 2027 and request health care coverage for Tracy. The agency gathers the information needed to determine eligibility for Tracy and approve Tracy for MA for adults without children effective January 1, 2027.
- Since December was the original application month for this case, six-month renewals will occur for June and December.
- Tracy's eligibility was approved before the ex parte process for June renewals had been initiated. Therefore, Tracy's first MA renewal will be for June 2027. Tracy's eligibility begins January 1, 2027, and ends May 31, 2027. If Tracy's MA for adults without children is renewed for June 2027, her next MA renewal will be for December 2027. Taylor's next renewal remains for December 2027.

Adults Without Children Enrolled in MA and EMA Before January 1, 2027

- Adults without children who were enrolled in MA or EMA before January 1, 2027, and who are not American Indians or Alaska Natives, will be subject to six-month eligibility renewals after their next regularly scheduled annual renewal initiated in January 2027 or later.
- When an MA or EMA enrollee goes from 12-month eligibility renewals to six-month eligibility renewals, 10-day advance notice of this reduction in the eligibility period must be given to the enrollee.
- Impact on existing enrollees will be different based on their renewal cohort and the system in which their eligibility is administered.

Transition to Six-Month Eligibility Renewals for Existing Enrollees

- It will take 13 months in total to transition existing enrollees to six-month eligibility renewals.
- Transition schedules will be different because the renewal processes are different for enrollees with eligibility in METS as compared to MAXIS.
  - Enrollees with eligibility in METS: Transition to six-month eligibility renewals will start with the April 2027 renewal cohort and end with the March 2028 renewal cohort.
  - Enrollees with eligibility in MAXIS: Transition to six-month eligibility renewals will start with the March 2027 renewal cohort and end with the February 2028 renewal cohort.

Transition Schedules for Existing Enrollees

Eligibility in METS

Renewal cohort	Next period of eligibility if renewed	Next renewal month
April 2027	4/1/2027 – 9/30/2027	October 2027
May 2027	5/1/2027 – 10/31/2027	November 2027
June 2027	6/1/2027 – 11/30/2027	December 2027
July 2027	7/1/2027 – 12/31/2027	January 2028
August 2027	8/1/2027 – 1/31/2028	February 2028
September 2027	9/1/2027 – 2/29/2028	March 2028
October 2027	10/1/2027 – 3/31/2028	April 2028
November 2027	11/1/2027 – 4/30/2028	May 2028
December 2027	12/1/2027 – 5/31/2028	June 2028
January 2028	1/1/2028 – 6/30/2028	July 2028
February 2028	2/1/2028 – 7/31/2028	August 2028
March 2028	3/1/2028 – 8/31/2028	September 2028

Eligibility in MAXIS

Renewal cohort	Next period of eligibility if renewed	Next renewal month
March 2027	3/1/2027 – 8/31/2027	September 2027
April 2027	4/1/2027 – 9/30/2027	October 2027
May 2027	5/1/2027 – 10/31/2027	November 2027
June 2027	6/1/2027 – 11/30/2027	December 2027
July 2027	7/1/2027 – 12/31/2027	January 2028
August 2027	8/1/2027 – 1/31/2028	February 2028
September 2027	9/1/2027 – 2/29/2028	March 2028
October 2027	10/1/2027 – 3/31/2028	April 2028
November 2027	11/1/2027 – 4/30/2028	May 2028
December 2027	12/1/2027 – 5/31/2028	June 2028
January 2028	1/1/2028 – 6/30/2028	July 2028
February 2028	2/1/2028 – 7/31/2028	August 2028

Example: Existing MA Enrollees with Eligibility in METS

- Luna, age 44, and Franny, age 38, are married and are enrolled in MA for adults without children. Their MA renewal is scheduled for May 2027.
- DHS initiates their renewal in February 2027 and cannot automatically renew their eligibility. They are mailed a renewal form, which they return with all necessary proofs on April 5, 2027. The servicing agency determines they remain eligible for MA for adults without children. Both Luna and Franny are now subject to six-month eligibility renewals.
- MA is approved for a six-month period of eligibility that begins May 1, 2027, and ends October 31, 2027. Luna and Franny are mailed a 10-day advance notice about the change from a 12-month period of eligibility to a six-month period of eligibility. Their next renewal month is November 2027.

Example: Existing MA and EMA Enrollees with Eligibility in MAXIS

- Hiro, age 27, is enrolled in MA for adults without children with eligibility in MAXIS. His MA renewal is scheduled for March 2027.
- DHS initiates his renewal in January 2027. He returns the renewal form with the necessary information and documentation to the servicing agency on February 3, 2027. The servicing agency determines Hiro remains eligible for MA for adults without children.
- Hiro is given a six-month period of eligibility, March 1, 2027, through August 31, 2027. Hiro is mailed a 10-day advance notice about the change from a 12-month period of eligibility to a six-month period of eligibility. His next renewal is scheduled for September 2028.

MA or EMA Enrollees with a Change in Basis of Eligibility to Adults Without Children On or After January 1, 2027

- MA or EMA enrollees who lose eligibility under their current basis of eligibility may qualify for MA or EMA for adults without children.
- If this occurs at renewal, the enrollee will be given a six-month period of eligibility and will be subject to six-month eligibility renewals.
- If this change occurs between renewals:
  - If eligibility is approved before the ex parte renewal process initiates for the next six-month eligibility period, the enrollee will have a renewal within the first six months.
  - If the approval occurs after the renewal was initiated, the enrollee's first renewal as an adult without children will be at the end of the second six-month eligibility period.

Example: MA or EMA Enrollees with a Change in Basis of Eligibility to Adults Without Children On or After January 1, 2027

- Anton, age 26, is enrolled in MA under a disabled basis of eligibility. His next MA renewal is scheduled for May 2027.
- Anton's renewal is initiated in February 2027. Anton's eligibility cannot be automatically renewed, so he is sent a renewal form. He submits his renewal form with all necessary information and documentation on April 4, 2027.
- The servicing agency processes the renewal and confirms the State Medical Review Team (SMRT) denied Anton's recent disability review. The servicing agency completes the Supplement to the Minnesota Health Care Programs Application for Certain Populations (DHS-6696B) over the phone with Anton to gather information needed to determine if Anton qualifies for MA under another basis of eligibility. On April 19, 2027, the servicing agency approves MA for adults without children in METS.
- Anton is subject to six-month eligibility renewals. Since May was his original application month, his renewals will occur for November and May. Anton's six-month period of eligibility begins May 1, 2027, and ends October 31, 2027. Anton is mailed a 10-day advance notice of the changes in basis of eligibility and eligibility period duration. His next renewal is scheduled for November 2027.

Legal References

- Public Law 119-21, section 71107
- Centers for Medicare and Medicaid Services State Medical Director Letter #26-001, pub. March 6, 2026

Thank You!

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