Pennsylvania
Department of Human Services

DATE: **March 3, 2026**

OPERATIONS MEMORANDUM #26-03-01

SUBJECT: Change in Policy for Immigration Status Verification Using Systematic Alien Verification for Entitlements (SAVE) and Verified Lawful Presence (VLP) at Renewal Due to H.R. 1

TO: Executive Directors

FROM: Robert Hixson
Director
Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) of the updated policy to systematically verify immigration status at renewal. This change is made for the purposes of supporting and preparing to meet new noncitizen rules included in the reconciliation law (Pub. L. 119-21), signed on July 4, 2025, also known as H.R. 1, an act to provide for reconciliation pursuant to title II of H. Con. Res 14.

SUMMARY AND CHANGE

Old Policy: SHB 740.1	**New Policy**
The CAO will verify a noncitizen's immigration status only once unless an adjustment in immigration status is reported or expected to change.	The CAO will verify a noncitizen's immigration status at application, when an adjustment in immigration status is reported or expected, and at renewal. See exceptions to this new policy in the Discussion.

BACKGROUND

On July 4, 2025, President Trump signed H.R. 1 into law. H.R. 1 only allows the following individuals to participate in the Supplemental Nutrition Assistance Program (SNAP):

- Citizens or nationals of the United States (U.S.).

- Noncitizens lawfully admitted for permanent residence as an immigrant as defined by sections 101(a)(15) and 101(a)(20) of the Immigration and Nationality Act.
- Noncitizens who have been granted the status of Cuban/Haitian Entrant, as defined in section 501(e) of the Refugee Education Assistance Act of 1980 (Public Law 96–422).
- Noncitizens who lawfully reside in the U.S. in accordance with a Compact of Free Association referred to in section 402(b)(2)(G) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.

This law limits noncitizen eligibility for Medicaid effective October 1, 2026, and not before. Additional policy will be issued prior to the effective date of this change.

DISCUSSION

As directed in Operations Memorandum (Ops Memo) 25-10-05, effective November 1, 2025, a new SAVE must be initiated at renewal to verify noncitizen immigration status for SNAP. Effective with the posting of this Ops Memo, the CAO will verify a noncitizen's immigration status at application, when an adjustment in immigration status is reported or expected, and at renewals scheduled after the posting date of this Ops Memo for Cash, SNAP, Medical Assistance (MA), and the Children's Health Insurance Program (CHIP), unless an exemption is met.

Exemptions:

- The noncitizen is a Lawful Permanent Resident (LPR) with a SAVE in Imaging that confirms their LPR status; or
- the noncitizen is applying for or receiving MA or CHIP only and had their noncitizen status verified through VLP; or
- the noncitizen is applying for or receiving Emergency Medical Assistance only.

The CAO will continue to follow noncitizen immigration verification policy and immigration status verification procedures per the existing guidance in ***CAH 122***, ***MAEH 322***, ***SNAP HB 522***, and ***CHIP HB 1105***.

This Ops Memo replaces previous policy which only required noncitizen immigration status verification at renewal if a noncitizen's status had changed.

PROCEDURES

When reviewing continued eligibility and whether program policy requires verification of immigration status, the CAO will use SAVE and/or VLP as determined by the corresponding benefit program:

Program	Immigration Status Verification
Cash	Must use SAVE at application, when there is an adjustment in status, and at renewal unless exempted. If the SAVE response indicates a change in immigration status, the CAO must request current immigration documents and provide the individual with a reasonable opportunity period of 90 days to provide the documents for Cash. If requested verification is not received, the CAO will send Advance Notice to close.
SNAP	Must use SAVE at application, when there is an adjustment in status, and at renewal unless exempted. For SNAP, if the recipient reports or the SAVE response indicates a change in immigration status, the CAO must request current immigration documents and provide the individual with at least 10 days to submit the documentation. If requested verification is not received, the CAO will send Advance Notice to close.
MA/CHIP	Must use VLP at application, when there is an adjustment in status, and at renewal unless exempted. Use SAVE if VLP fails. If the noncitizen is applying for or receiving MA or CHIP only and VLP or SAVE confirms a change in immigration status that the noncitizen has reported, there is no need for the CAO to request current immigration documents.

	If the noncitizen is applying for or receiving MA or CHIP only and the VLP or SAVE conflicts with the immigration status that the noncitizen reported or is on the record, the CAO must request current immigration documents and provide the individual with a reasonable opportunity period of 90 days. If requested verification is not received, the CAO will send Advance Notice to close.

NEXT STEPS

1. Share and review this Ops Memo with appropriate staff.
2. Direct questions on this Ops Memo to your Area Manager.