



“Qualified” vs. “Satisfactory” Immigration Status Chart

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Introduction: Qualified vs. Satisfactory Immigration Status

The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) limits the availability of “public benefits” to only “qualified” immigrants. The definition of “qualified” immigrant appears at 8 U.S.C. § 1641.

PRWORA imposes additional eligibility restrictions for certain federal means-tested public benefits, including Medicaid. 8 U.S.C. § 1613. As a result, not all qualified immigrants are eligible for full-scope Medicaid. For example, some qualified immigrants must wait five years before becoming eligible for full-scope Medicaid.¹

Individuals who are not eligible for Medicaid based on their immigration status are considered to have an “unsatisfactory immigration status” or “UIS” and are generally eligible for emergency Medicaid only. Individuals who have a qualified immigration status but have not met the five-year waiting period have an unsatisfactory immigration status for Medicaid.

Thus, whether someone has UIS is not a proxy for not-qualified status (nor is it a proxy for lack of lawful status). As detailed below, many qualified immigrants, including lawful permanent residents (LPRs), nonetheless have UIS for full-scope Medicaid and are eligible for emergency Medicaid only.

On the other hand, having a satisfactory immigration status is not necessarily a proxy for having a qualified status. Some lawfully present immigrants are eligible for full-scope Medicaid

¹ For a description of immigrant eligibility for Medicaid before the passage of OBBBA, including additional detail regarding the five-year bar, its application and exemptions *see generally* Sarah Grusin & Catherine McKee, National Health Law Program, Medicaid Coverage for Immigrants: Eligibility and Verification (2021), <https://healthlaw.org/resource/medicaid-coverage-for-immigrants/>.

without a qualified immigration status. Specifically, states have the option to provide full-scope Medicaid coverage to “lawfully residing” children and pregnant “women.”² 42 U.S.C. § 1396b(v)(4). And the definition of lawfully residing is broader than the qualified immigrant category.³ Thus, in states that have elected this option, full-scope Medicaid is available to children or pregnant individuals who are lawfully residing but lack a qualified status (and, thus, who would otherwise be eligible for emergency Medicaid only).

On July 10, 2025, the U.S. Department of Health and Human Services published a [Notice](#) redefining the term “public benefits” to include many programs that have never before been considered public benefits, such as Community Health Centers, Title X clinics, and Head Start programs. The Notice did not alter the definition of a “qualified” immigrant.

Starting October 1, 2026, when OBBBA’s new Medicaid immigrant restrictions go into effect, federal Medicaid funding will be available only to a narrow group of immigrants—LPRs, COFA migrants, and certain Cuban and Haitian entrants. Other groups currently eligible for full-scope Medicaid, such as refugees and asylees, will lose eligibility, thus expanding the category of “unsatisfactory immigration status.” OBBBA did not alter the definition of “qualified” immigrants and many of the groups losing Medicaid eligibility will remain “qualified” for purposes of PRWORA.

In short, whether someone is “qualified” under PRWORA is distinct from whether someone has a satisfactory immigration status for purposes of Medicaid eligibility. And it cannot be inferred that someone with an unsatisfactory immigration status for Medicaid is not qualified or that they lack lawful status.

The chart below provides additional details about specific immigration statuses and identifies whether each status is qualified or a satisfactory immigration status.

² For a list of states who have elected to cover children, pregnant people, or both, see KFF, Medicaid/CHIP Coverage of Lawfully-Residing Immigrant Children and Pregnant Women (Jan. 2025), <https://www.kff.org/affordable-care-act/state-indicator/medicaid-chip-coverage-of-lawfully-residing-immigrant-children-and-pregnant-women/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>. The following states cover lawfully residing children: AK, CA, CO, CT, DE, DC, FL, GA, HI, IL, IA, KY, LA, ME, MD, MA, MI, MN, MT, NE, NV, NH, NJ, NM, NY, NC, OH, OR, PA, RI, SC, TX, UT, VT, VA, WA, WV, WI. The following states cover lawfully residing pregnant individuals: AK, CA, CO, CT, DE, DC, GA, HI, KY, ME, MD, MA, MI, MN, NE, NV, NH, NJ, NM, NY, NC, ND, OH, PA, RI, SC, VT, VA, WA, WV, WI, WY.

³ CMS, Dear State Health Official Letter, 10-006 (July 1, 2010), <https://downloads.cms.gov/cmsgov/archived-downloads/smdl/downloads/sho10006.pdf>

Immigration Category or Population	Satisfactory Immigration Status for federally-funded Medicaid (8 U.S.C. § 1613, 42 U.S.C. §§ 1396b(v)(4), (v)(5))	Qualified (8 U.S.C. § 1641)
LPRs Lawful Permanent Residents ("green card" holders) who have met or are exempt from the 5-year waiting period	YES	YES
LPRs Lawful Permanent Residents ("green card" holders) who have NOT met the 5-year waiting period	NO, unless pregnant or child in state that has elected coverage.	YES
Cuban and Haitian entrants	YES	YES
COFA nationals	YES	YES
Refugees	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES
Individuals granted asylum	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES
Individuals paroled into the U.S. for a period of at least one year	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES
Individuals paroled into the U.S. for less than one year	NO, unless pregnant or child in state that has elected coverage.	NO
Individuals granted withholding of deportation	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES

Immigration Category or Population	Satisfactory Immigration Status for federally-funded Medicaid (8 U.S.C. § 1613, 42 U.S.C. §§ 1396b(v)(4), (v)(5))	Qualified (8 U.S.C. § 1641)
Individuals granted conditional entry	Before 10/2026: YES After 10/2026: NO, unless pregnant; or child.	YES
T visa holder or applicant with a “prima facie” case	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES
VAWA recipients who have met or are exempt from the five-year waiting period	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES
VAWA recipients who have NOT met the five-year waiting period	NO, unless pregnant or child in state that has elected coverage.	YES
Iraqi and Afghan special immigrants	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES ¹
Certain Afghan parolees	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES ¹
Certain Ukrainian parolees	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES ¹
Amerasian immigrants	Before 10/2026: YES After 10/2026: NO, unless pregnant or child in state that has elected coverage.	YES ¹
U visa holder	NO, unless pregnant or child in state that has elected coverage.	NO
Asylum Applicants	NO, unless pregnant or child in state that has elected coverage.	NO

Immigration Category or Population	Satisfactory Immigration Status for federally-funded Medicaid (8 U.S.C. § 1613, 42 U.S.C. §§ 1396b(v)(4), (v)(5))	Qualified (8 U.S.C. § 1641)
Special Immigrant Juvenile Status (SIJS)	NO, unless pregnant or child in state that has elected coverage.	NO
Temporary Protected Status	NO, unless pregnant or child in state that has elected coverage.	NO
Lawful Temporary Resident Status	NO, unless pregnant or child in state that has elected coverage.	NO
Family Unity beneficiaries	NO, unless pregnant or child in state that has elected coverage.	NO
Deferred Enforced Departure	NO, unless pregnant or child in state that has elected coverage.	NO
Granted Withholding of Removal under the Convention Against Torture (or applicant for CAT with employment authorization)	NO, unless pregnant or child in state that has elected coverage.	NO
Individuals lawfully present in the Commonwealth of the Northern Mariana Islands or American Samoa	NO, unless pregnant or child in state that has elected coverage.	NO
Certain non-immigrant visa holders: <ul style="list-style-type: none"> ● Workers (e.g. H-1B, L-1, TN) ● Students (e.g. F-1, M-1, J-1) ● Visitors (e.g. B-1, B-2) 	NO, unless pregnant or child in state that has elected coverage.	NO
Deferred Action (not DACA)	NO, unless pregnant or child in state that has elected coverage.	NO

Immigration Category or Population	Satisfactory Immigration Status for federally-funded Medicaid (8 U.S.C. § 1613, 42 U.S.C. §§ 1396b(v)(4), (v)(5))	Qualified (8 U.S.C. § 1641)
Other “lawfully present” immigrants under CHIPRA	NO, unless pregnant or child in state that has elected coverage.	NO
DACA recipients	NO	NO
Undocumented	NO	NO

ENDNOTES

¹ While not listed as qualified in 8 U.S.C. § 1641, these groups are treated as refugees for purposes of eligibility for benefits under separate federal statutes and thus would be eligible for “public benefits” under PRWORA to the same extent as refugees. For Afghan and Iraqi special immigrants see Pub. L. 110-181, § 1244(g) (2008) (codified at 8 U.S.C. 1101 note); Pub. L. 111-9, § 602(b)(8) (2009), Pub. L. 111-118, § 8120(b) (2010), and Pub. L. 113-291, § 1227 (2014) (codified at 8 U.S.C. § 1101 note). For Amerasian immigrants, see Pub. L. 100-202, § 101(e) (codified at 8 U.S.C. § 1101 note). For Afghan parolees, see Pub. L. 117-43, § 2502(b)(1) (codified at 8 U.S.C. § 1101 note). For Ukrainian parolees, see Pub. L. 117-128, § 401(b)(1) (codified at 8 U.S.C. § 1101 note). *See also, generally* 42 C.F.R. § 435.4 (defining “qualified noncitizen”).