Wisconsin Department of Children and Families

Governor Tony Evers
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TO: **BRP-Funded Agencies**

FROM: Bojana Zorić Martinez, Director
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Division of Family and Economic Security
Department of Children and Families

BRP OPERATIONS MEMO

No: 26-22
DATE: 08/13/2026
Amended 10/30/2026

RCA ☒ **RMA** ☒ **RMS** ☐ **RHP- any** ☐

RSS-E&E ☐ **RSS-OS** ☐ **SOR- any** ☐

ARSS (AIRLS) ☐ **URSS (UIRLS)** ☐

RSS-ESL, Wis Lit ☐

WFTCP ☐ **RSI- any** ☐ **RYM- any** ☐

SUBJECT: Eligibility Period Extension for RCA and RMA

CROSS REFERENCE: 90 FR 13370
91 FR 43107
BRP Policy Manual
45 CFR Part 400

EFFECTIVE DATE: JANUARY 1, 2026*

*Note that the internal BRP policy regarding Six-month Eligibility Reviews, which is incidental to the eligibility extension described in this memo, is not in effect until October 1, 2026. Six-month Eligibility Review requirements are described in the Overview of Policy Implementation section below. Changes added with the amendment published on October 30, 2026 are indicated with green highlights.

PURPOSE

The purpose of this memo is to announce a change of eligibility period for Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA), which was extended from four months to eight months on July 14, 2026, and then from eight to twelve months on October 1, 2026. The ~~eight~~ twelve-month eligibility period shall apply to any eligible RCA and/or RMA recipient with a date of eligibility on or after January 1, 2026.

BACKGROUND

The eligibility period for RCA and RMA, authorized by the Director of ORR in accordance with 45 CFR 400.211(b), was eight months from FY 1992 until FY 2022, when it was increased to 12 months during a surge in refugee admissions. On March 21, 2025, 90 FR 13370 announced the

shortening of the eligibility period from 12 months to four. That four-month eligibility period was in effect until the publication of 91 FR 43107 on July 14, 2026, which extended the eligibility period from four to eight months.

POLICY

The changes announced in this memo are retroactively effective, beginning on January 1, 2026. Therefore, this memo contains guidance for retroactive vs prospective implementation, which shall be applied to two different groups of RCA and RMA participants. These groups are defined by their date of eligibility, and specific guidance for each group and program is detailed below. This memo also contains an overview of the new policy's implementation into the BRP Policy Manual.

The guidance below that was issued in the first iteration of this memo on August 13, 2026 was implemented in the weeks following its publication. Additional guidance accounting for the new dates has been included and must be adhered to as applicable beginning on October 30, 2026.

It should also be noted that certain chapter numbers have changed throughout the BRP Policy Manual since the first publication of this memo. Those new chapter numbers are also indicated in green highlights.

Guidance for Retroactive vs Prospective Implementation

RCA Recipients with Date of Eligibility on or Between January 1 and April 13, 2026

This group lost eligibility before the publication of this memo due to the previously enacted four-month eligibility period in place at that time. The eligibility extension announced in this memo allows this group to receive retroactive RCA payments in an amount totaling up to four additional months of eligibility, given all other eligibility criteria were met during that time.

In order for RCA recipients in this group to receive retroactive payments, RCA administrators at W-2 agencies (referred to as Financial Employment Planners, or FEPs) must establish eligibility for each of the months following their four-month eligibility end date in order to determine whether retroactive payments shall be issued, and in what amount.

Establishing eligibility may be done over the phone or in-person, with reference to the eligibility criteria found on form DCF-F-5765 (RCA Rules, Rights and Responsibilities Agreement, DCF Forms Search). As with any payments issued in accordance with section 5.6.9 of the BRP Policy Manual, retroactive payments also must be mailed within five working days of establishing retroactive eligibility.

For any time remaining in the eight-month total eligibility period, RCA recipients are automatically considered to be re-enrolled in RCA with an end date eight months after their date of eligibility. For anyone who received a partial August check due to having a four-month eligibility end date on or between August 1st and August 12th, the process in this section does apply and must be followed before issuing another partial August check and informing the RCA recipient of their program re-enrollment and new eligibility end date.

A detailed case comment, in addition to satisfying usual RCA reporting requirements, is a sufficient means of documenting the specific process described herein. The following example illustrates this process:

Ali arrived in Wisconsin with refugee status on February 15, 2026 and received RCA payments covering the time period from February 15 through June 14, 2026. Upon publication of this memo, the FEP who managed his case at that time identified him as an RCA recipient who may be eligible for retroactive payments due to his date of eligibility. The FEP called Ali with an interpreter to inform him of the eligibility extension. Referencing the RCA program rules and responsibilities on form DCF-F-5765, the FEP asked Ali whether there were any changes that would have impacted his eligibility during the months of June, July, or August. Ali replied no, indicating that he is still seeking employment, has not enrolled full-time in higher education, has not turned down any offers of employment, and is not receiving any other cash assistance (e.g SSI, W-2). The FEP informed Ali that he will receive retroactive payments totaling a partial payment for June, a full payment for July, and a full payment for August, which will be mailed within five working days of their conversation. The FEP informed Ali that his eligibility end date for participation in the RCA program is now October 14, 2026, during which time he may continue to receive monthly payments based on the same rules and responsibilities outlined during the initial intake appointment.

RCA Recipients with Date of Eligibility on or Between January 1 and March 1, 2026

This group's time eligibility according to the previous eight-month implementation (in effect from August 14 to October 31, 2026) has expired as of this amendment, published on October 30, 2026. For this group, retroactive payments must be issued that account for the duration of time in September and October 2026 since their eight-month eligibility expired.

For the time remaining in the twelve-month total eligibility period, RCA recipients in this group are automatically considered to be re-enrolled in RCA with an end date twelve months after their date of eligibility.

All other applicable guidance contained in this memo applies (e.g. establishing retroactive eligibility, informing RCA recipients of new eligibility dates, documentation requirements).

RMA Recipients with a Date of Eligibility on or Between January 1 and April 13, 2026

This group lost eligibility before the publication of this memo due to the previously enacted four-month eligibility period in place at that time. The eligibility extension announced in this memo allows this group to choose between one of the following two options:

1. Receive retroactive coverage for medical expenses during additional months for which they are now retroactively eligible, given all other eligibility criteria are met, beginning the first day following their previous eligibility end date; or,
2. Re-enroll in RMA for remaining additional months, given all other eligibility criteria are met, beginning the date of recertification with Forward Health.

If the individual initially became eligible for RMA due to earnings from employment that resulted in a loss of Medicaid, the automatic certification procedures outlined in section 6.6.2 of the BRP Policy Manual apply and eligibility need not be established.

If the individual was never eligible for Medicaid, RMA administrators at W-2 agencies (referred to as FEPs) must establish eligibility for the months following their four-month eligibility end date in order to determine whether they were eligible for RMA at that time. Establishing eligibility may be done over the phone or in person, with reference to the eligibility criteria described in sections 6.4 and 6.5 of the BRP Policy Manual.

In both cases (automatic certification or making a retroactive eligibility determination), RMA coverage must be re-established with Forward Health manually for the applicable time period using form *Medicaid/BadgerCare Plus Eligibility Certification (F-10110)*, and carefully following the steps outlined in section 6.6.2 of the BRP Policy Manual. The specific time period is defined by the date of eligibility and whether the eligible RMA recipient chose retroactive months of coverage or additional, prospective months of coverage. After manually re-establishing RMA coverage with Forward Health, RMA recipients with an updated Forward Health card will be able to work with their individual health care provider(s) to ensure that any eligible medical expenses are covered.

A detailed case comment, in addition to satisfying usual RMA reporting requirements, is a sufficient means of documenting the specific process described herein. The following example illustrates this process:

> *Jose arrived in Wisconsin with refugee status on February 15, 2026 and was initially eligible for Medicaid/BadgerCare+. He began working on March 20th and earned income that resulted in a loss of BadgerCare+. He enrolled in RMA and was covered for the remainder of his four-month eligibility period, until June 14, 2026. Upon publication of this memo, the FEP who managed his case at that time identified him as someone who may be eligible for additional months of RMA coverage. The FEP called Jose with an interpreter on August 18, 2026 and informed him of the eligibility extension. Given that Jose initially became eligible for RMA due to loss of BadgerCare+ coverage, the FEP informed Jose that he was automatically eligible for four additional months of RMA coverage and asked him whether he would like retroactive coverage beginning on June 15, 2026 or prospective coverage beginning on August 18, 2026. Jose chose retroactive coverage due to a medical expense that occurred during that time for which he was not covered. The FEP informed Jose that his extended coverage will include the time period on and between June 15 and October 14, 2026. The FEP informed him that once he receives his updated Forward Health card, he must work with his individual health care provider(s) to ensure that any eligible medical expenses are covered.*

RMA Recipients with Date of Eligibility on or Between January 1 and October 30, 2026

For everyone in this group, *Medicaid/BadgerCare Plus Eligibility Certification (F-10110)* must be re-submitted according to the steps included in section 6.6.2 of the BRP Policy Manual. That form must indicate a coverage end date that is twelve months from the date of eligibility.

For the time remaining in the twelve-month total eligibility period, RCA recipients in this group are automatically considered to be re-enrolled in RCA with an end date twelve months after their date of eligibility.

All other applicable guidance contained in this memo applies (e.g. establishing retroactive eligibility, informing RCA recipients of new eligibility dates, documentation requirements).

RCA Recipients with a Date of Eligibility on or after April 14, 2026 (Prospective)

This group did not lose eligibility yet due to the four-month eligibility period, as of this memo's date of publication, and are therefore not eligible for any retroactive payments. If RCA recipients in this group remain otherwise eligible, they will be eligible for up to twelve total months of RCA payments, during which time their case shall be considered active as long as there are no other changes impacting their eligibility.

For the time remaining in the twelve-month total eligibility period, these RCA recipients are automatically considered to be re-enrolled with an end date twelve months after their date of eligibility. FEPs must contact RCA recipients in this group to inform them of the eligibility extension and verify current eligibility. Anyone who received a partial August check due to having a four-month eligibility end date on or between August 13th and August 31st will receive another partial August check in addition to any checks issued in the future while time remains in their eligibility period.

FEPs must contact RCA recipients in this group to inform them of the eligibility extension and to confirm their new eligibility end date. A detailed case comment, in addition to satisfying usual RCA reporting requirements, is a sufficient means of documenting the specific process described herein. Any new RCA enrollments on or after August 13, 2026 shall follow only RCA case processing guidance in the BRP Policy Manual.

RMA Recipients with a Date of Eligibility on or after April 14, 2026 (Prospective)

This group did not lose eligibility yet due to the four-month eligibility period, as of this memo's date of publication, and are therefore not eligible for any retroactive coverage. RMA recipients in this group will have four months of eligibility added to their eligibility timeline, for a total of no more than twelve months of eligibility. RMA recipients who are already enrolled are automatically considered to be re-enrolled with an end date eight months after their date of eligibility.

The eligible RMA coverage period must be updated with Forward Health manually for the applicable time period using form *Medicaid/BadgerCare Plus Eligibility Certification (F-10110)*, and carefully following the steps outlined in section 6.6.5 of the BRP Policy Manual. The specific time period is defined by the date of eligibility and the eight-month time limit. After manually extending RMA coverage with Forward Health by resubmitting the certification form, eligible medical expenses will be subsequently covered.

FEPs must contact RMA recipients in this group to inform them of the eligibility extension and to confirm their new eligibility end date. A detailed case comment, in addition to satisfying usual RMA reporting requirements, is a sufficient means of documenting the specific process described herein. Any new RMA enrollments on or after August 13, 2026 shall follow only RMA case processing guidance in the BRP Policy Manual.

Overview of Policy Implementation into the BRP Policy Manual

RCA

Eligibility

The eligibility time period for RCA shall be revised from ~~four months to~~ eight months to 12 months under Eligibility Overview (section 5.4.1) and Date of Eligibility (section 5.4.3), as well as in all incidental references to the 12-month eligibility period throughout the manual.

Eligibility Reviews

The Eligibility Review policy (section 5.6.7) shall be revised. The requirement to conduct a six-month eligibility review, which was eliminated upon enactment of the four-month eligibility period, shall be reinstated. Six-month Eligibility Reviews shall be required for anyone for whom six months from their date of eligibility falls on October 1, 2026 or later. As per current policy (section 5.4.7.4), information about an active case may still be gathered at any time outside of these prescribed review periods if there is a reason to review the case.

Sanctions

Due to the extended eligibility time period, a three-month sanction due to full non-compliance no longer necessarily represents a case closure. Section 5.6.12 has been revised to reflect this change.

REPORTING

As with usual RCA payments, retroactive payments must be recorded separately for each benefit month, even if those benefit months are paid on the same check and with the same check number.

As with usual RCA payments, monthly expenditures are due in SPARC by the 23rd of the following month (e.g., January 2026 expenses are due February 23, 2026). DCF allows SPARC updates for 60 days. Given that retroactive payments will likely require reporting SPARC expenditures that exceed this time limit, follow the related instructions below:

For changes beyond 60 days, follow these steps:

Download and fill out the SPARC Expenditure Adjustment spreadsheet.

Save the file using this format: Year.Month.Agency-SPARC Expenditure Adjustment (e.g., 2026.8.BRP-SPARC Expenditure Adjustment).

Email the completed file to the BRP Contract Specialist and copy the designated BRP Program Coordinator.

DOCUMENTATION

Revised versions of the following RCA forms shall be published to the DCF Forms website following publication of this memo. All policies and processes described in this memo are considered fully implemented as described as of August 13, 2026.

DCF-F-5764 RCA Eligibility Reviews
DCF-F-5765 RCA Rules, Rights and Responsibilities Agreement

TRAINING

BRP will provide an optional technical assistance session on August 18, 2026. Meeting invites will be sent via BRP's general email communications list following the publication of this memo.

AGENCY ACTION

Workers at W-2 agencies serving RCA or RMA recipients with eligibility dates on or after January 1, 2026 must contact those individuals as described herein within five working days of publication of this memo.

Any retroactive RCA payments issued must be issued within five working days of establishing retroactive eligibility as described herein.

The updated Six-month Eligibility Review policy must be followed for anyone whose six-month anniversary from their date of eligibility falls on October 1, 2026 or later.

ATTACHMENTS

N/A

CONTACTS

For BRP Policy Questions: DCFRefugee@wisconsin.gov

For WRPD Questions: DCFWRPDSupport@wisconsin.gov

DCF/DFES/BRP/RD