

SUPREME COURT OF NEW JERSEY

Manuel Guaman, Maria Guaman, Nadia Chery, Deyinira Valenzuela,
Rosa Rodriguez, and Keithion Blake v. Jennifer Velez, Commissioner
of the New Jersey Department of Human Services, and John Guhl,
Director of Medical Assistance and Health Services

432 N.J. Super. 230 (App. Div. 2013) (N.J. 2015) · No. A-87, September Term 2013; 073371 · Decided March 30, 2015

SUMMARY

The Supreme Court of New Jersey affirmed the Appellate Division’s judgment upholding the termination of state-funded Medicaid benefits for certain lawful permanent resident aliens who had not satisfied the federal five-year residency requirement under PRWORA. The Court concluded that New Jersey’s policy was authorized by the federal statutory framework and did not violate the Federal or New Jersey Constitutions. Chief Justice Rabner and Justice Albin dissented, and Judge Cuff did not participate.

CASE DETAILS

COURT	Supreme Court of New Jersey
WRITING FOR THE COURT	Per Curiam; Chief Justice Rabner; Justice LaVecchia; Justice Albin; Justice Patterson; Justice Fernandez-Vina; Justice Solomon; Judge Cuff (temporarily assigned; did not participate)
JURISDICTION	New Jersey
DECIDED	March 30, 2015
DOCKET	A-87, September Term 2013; 073371
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiffs appealed as of right from the Appellate Division's published judgment affirming the adoption and amendment of regulations terminating state-funded Medicaid benefits for certain adult lawful permanent resident aliens.
STANDARD OF REVIEW	The court adopted the Appellate Division's constitutional analysis, under which rational-basis review applied because the challenged state policy was authorized by a uniform federal immigration policy.
PRECEDENTIAL VALUE	precedential

PARTIES

Manuel Guaman, Maria Guaman, Nadia Chery, Deyinira Valenzuela, Rosa Rodriguez, Keithion Blake v. Jennifer Velez, Commissioner of the New Jersey Department of Human Services, John Guhl, Director of Medical Assistance and Health Services

TOPICS

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rational basis review

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether New Jersey could deny state-funded Medicaid or Medicaid-like benefits to adult lawful permanent resident aliens who did not satisfy PRWORA's federal five-year residency requirement.
2. Whether the challenged state regulations violated the equal protection guarantees of the United States Constitution or the New Jersey Constitution.
3. Whether PRWORA's federal immigration and public-benefits policy uniformly authorized states to adopt the five-year residency restriction.

HOLDINGS

1. New Jersey may deny state-funded Medicaid or Medicaid-like benefits to lawful permanent resident aliens who do not meet PRWORA's five-year residency requirement when the State acts consistently with the federal policy reflected in PRWORA.
2. The challenged regulations did not violate the equal protection guarantees of either the United States Constitution or the New Jersey Constitution.

FACTUAL BACKGROUND

New Jersey terminated NJ FamilyCare enrollment for adult lawful permanent resident aliens who had lived in the United States for less than five years and therefore did not qualify for federally funded Medicaid under the Personal Responsibility and Work Opportunity Reconciliation Act. The State had previously removed the five-year requirement but reinstated it in 2010 because of a budget crisis, while retaining coverage for pregnant women, children, and certain existing enrollees receiving life-sustaining or treatment for life-threatening conditions. The State's action was found to be based on financial concerns rather than an invidious discriminatory purpose.

PROCEDURAL HISTORY

Plaintiffs sought emergent relief and a preliminary injunction against termination of their NJ FamilyCare enrollment. The Appellate Division denied preliminary relief in *Guaman v. Velez*, 421 N.J. Super. 239 (App. Div. 2011), and later affirmed the challenged regulations in *Guaman v. Velez*, 432 N.J. Super. 230 (App. Div. 2013).

The Supreme Court of New Jersey affirmed substantially for the reasons stated in the Appellate Division majority opinion.

DISPOSITION

affirmed

CASES CITED

- Guaman v. Velez, 421 N.J. Super. 239 (App. Div. 2011)
- Guaman v. Velez, 432 N.J. Super. 230 (App. Div. 2013)
- Mathews v. Diaz, 426 U.S. 67 (1976)
- Plyler v. Doe, 457 U.S. 202 (1982)

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