



# Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

Date: July 12, 2024

Subject: Supplemental Nutrition Assistance Program – Provisions in the Consolidated Appropriations Act, 2024

To: All SNAP State Agencies  
All Regions

On March 9, 2024, President Joseph R. Biden signed into law the Consolidated Appropriations Act, 2024 (CAA) ([P.L. 118-42](#)). This memorandum addresses questions Food and Nutrition Service (FNS) has received about the provisions of the CAA that affect the Supplemental Nutrition Assistance Program (SNAP).

Division G, Title II, Section 209(f) of the CAA amends Section 402 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) ([P.L. 104-193](#)) and provides that Compacts of Free Association (COFA) citizens of the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau who lawfully reside in the United States are eligible for certain Federal public benefit programs, including SNAP.

COFA citizens are not subject to a waiting period and are immediately eligible for benefits as long as they meet all other SNAP financial and non-financial eligibility requirements.

State agencies must verify the immigration status of COFA citizens through the Systematic Alien Verification for Entitlements (SAVE) program. For SAVE resources related to COFA migrants, please reference the U.S. Citizenship and Immigration Services (USCIS) webpage titled "[Federated States of Micronesia, Republic of the Marshall Islands, and Palau](#)" and the USCIS "[Guide to Understanding SAVE Verification Responses](#)."

COFA citizens who applied on or after March 9, 2024, and were denied for SNAP prior to issuance of this FNS guidance may reapply for SNAP to be determined eligible under the provisions of the CAA from the date of reapplication. In addition, those individuals who applied and were denied may request a fair hearing within 90 days of the date of denial according to [7 CFR 273.15](#). If the official determines the household was eligible for SNAP at the time of application, the State agency should issue retroactive benefits from the date of application.

As a best practice, FNS encourages State agencies to track COFA citizens denied under regular SNAP rules between March 9, 2024, and the date of this guidance memorandum and conduct outreach encouraging individuals to request a fair hearing or reapply.

COFA citizens residing in American Samoa, Puerto Rico, or the Commonwealth of the Northern Mariana Islands (CNMI) are not eligible for SNAP. Questions about COFA citizen eligibility for the Nutrition Assistance Programs (NAPs) operating in these territories in lieu of SNAP will be addressed under separate FNS guidance to be issued at a later date.

State agencies with questions regarding this guidance should contact their respective regional office representatives.

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