



MEPD and TW Bulletin 25-13

Date: July 22, 2025

To: Eligibility Services Supervisors and Staff
Program Managers
Regional Directors
Policy Attorneys
Hearings Officers

From: Access and Eligibility Services Program Policy
State Office 2106

Subject: Compacts of Free Association (COFA) Eligibility

The information in this bulletin will be included in a future handbook revision. Until the handbook is updated, staff must use the information in this bulletin. If you have any questions regarding the policy information in this bulletin, follow regional procedures.

Active bulletins are posted on the following websites:

- [Medicaid for the Elderly and People with Disabilities Handbook \(MEPDH\)](https://hhs.texas.gov/laws-regulations/handbooks/mepd/policy-bulletins) at <https://hhs.texas.gov/laws-regulations/handbooks/mepd/policy-bulletins>;
- [Texas Works Handbook \(TWH\)](https://hhs.texas.gov/laws-regulations/handbooks/texas-works-handbook/texas-works-bulletins) at <https://hhs.texas.gov/laws-regulations/handbooks/texas-works-handbook/texas-works-bulletins>.

Compacts of Free Association (COFA) Eligibility

Background

The COFA are agreements between the United States and three independent states, the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau. Citizens from independent states under the COFA agreements may enter, reside, and work in the United States without restriction.

On March 9, 2024, President Biden signed the Consolidated Appropriations Act (CAA) of 2024, Public Law 118-42. The law includes a provision which updates eligibility for certain federal benefits, including SNAP and TANF, for citizens of the three independent states who are lawfully residing in the United States in accordance with the COFA.

Current Policy

[SNAP and TANF](#)

A person residing in the U.S. under the provisions of the COFA is not eligible for benefits unless they obtain a qualifying immigration status. A person is ineligible for benefits if they are not a U.S citizen or have a qualifying alien status found in [TWH A-341, SNAP Alien Status Eligibility Charts](#), or [TWH A-342, TANF and Medical Programs Alien Status Eligibility Charts](#).

New Policy

[SNAP and TANF](#)

A person who lawfully resides in the U.S. under the provisions of a COFA agreement is considered a qualified non-citizen and eligible for benefits if they meet all other eligibility requirements.

Acceptable verification of immigration status for COFA citizens includes:

- I-94 or I-766 with the following Class of Admission (COA) Codes:
- CFA/RMI – Citizen of Republic of the Marshall Islands (RMI) due to the Compact of Free Association
 - CFA/FSM – Citizen of the Federated States of Micronesia (FSM)
 - CFA/PAL – Citizen of the Republic of Palau
- I-766 Employment Authorization Document (EAD) with the following Category Code:
 - A-08 Citizen of the Marshall Islands, Micronesia or Palau admitted as a nonimmigrant.
- An unexpired passport with annotations "CFA/RMI," "CFA/FSM" or "CFA/PAL."

COFA citizens denied SNAP may reapply to have their eligibility determined under the provisions of the CAA from the new application file date. In addition, households denied SNAP may request a fair hearing within 90 days of the date of denial. If HHSC determines the household was eligible for SNAP at the time of application on or after Aug. 1, 2025, the household will receive retroactive benefits from the date of application.

Staff must use **CPM 960286 - Qualified Non-citizens under Compacts of Free Association States (Revised)** to certify a qualified COFA citizen for SNAP, TANF, or Medicaid (MEPD or TW).

Automation

Automation changes are not required.

Correspondence

Correspondence changes are not required.

Handbook

Updates to the MEPDH are not required.

The TWH is currently scheduled to be updated in the January 2026 revision.

Training

Training is not required.

Effective Date

This policy is effective for applications, redeterminations, and changes received on or after Aug. 1, 2025.