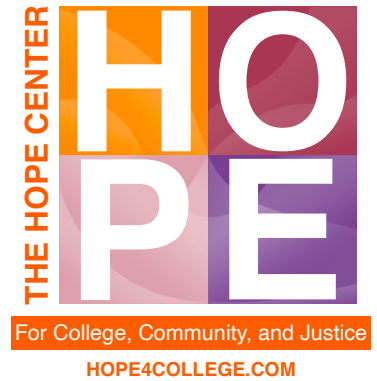


## Best Kept Secrets:

### *The Federal Government Expanded SNAP Eligibility for College Students, But Many Never Heard About It*



**By Tom Hilliard and Denisha Hobbs**

## Executive Summary

About one-third of college students report being food-insecure. Yet college students, unlike other adults, can only enroll in the Supplemental Nutrition Assistance Program (SNAP)—the primary public benefit subsidizing food purchases—if they meet at least one of a laundry list of narrowly-drawn criteria (also known as exemptions). But in December 2020, Congress passed a law including provisions that made SNAP enrollment much simpler and more expansive. The law opened SNAP up to students assigned to federal or state work-study and students with a \$0 Expected Family Contribution (EFC)—meaning that their household is at the lowest income level tracked for purposes of Federal financial aid. It was an important breakthrough, even though the new avenues will terminate when the COVID-19 public health emergency (PHE) ends (currently scheduled for October 2022). But it was an important breakthrough that too few students benefited from, let alone knew about.

Eligibility expansions are not self-executing. State agencies that administer SNAP must inform college students and college staff about the availability of this new benefit—and they must do so promptly as the benefit is scheduled to end soon. The Hope Center for College, Community, and Justice sought to find out if there were any attempts by states to fulfill their vital education and outreach role around expanded SNAP eligibility for students.

The Hope Center conducted a review of the websites of state agencies and SNAP outreach partners in all 50 states to determine what states were communicating about expanded SNAP eligibility for students. Our scan sets a minimum benchmark for state implementation: making available eligibility information on the website of a relevant state entity.

We then sorted the states into three categories:

- Low outreach: those who provided no information on their websites;
- Some outreach: those who provided at least basic information on their websites;
- High outreach: those who included information on their websites and voluntarily took additional steps to inform students and college officials.

Our findings show that eighteen states did not post information on expanded SNAP eligibility for students on relevant websites. Twenty-five states provided relevant information about expanded SNAP eligibility for students on state websites. Eight states provided relevant information about expanded SNAP eligibility for students on state websites *and* took additional steps to communicate or encourage the program's use.

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The Hope Center also sought to understand the stakes of effective outreach by quantifying how many potentially eligible students reside in each state. The Century Foundation analyzed the number of undergraduate students attending public colleges in each state who potentially qualify for SNAP due to having \$0 EFC.

- Nationally, there are approximately six million undergraduate students at \$0 EFC in 2019-2020 at public colleges and universities, which is about 35% of all undergraduate students at public colleges and universities.
- Approximately 3.5 million undergraduate students at \$0 EFC at public institutions were made eligible by the PHE expansion. The remaining 2.5 million undergraduate students at \$0 EFC were estimated to be ineligible due to lack of U.S. citizenship or having a household income above the SNAP eligibility threshold or were already eligible under permanent SNAP exemptions.
- Approximately 766,000 newly SNAP-eligible undergraduate students at \$0 EFC attended public colleges in the 18 states with low outreach, which makes up about 22% of all such students nationwide.
- Approximately 1.6 million newly SNAP-eligible undergraduate students at \$0 EFC attended public colleges in the 24 some-outreach states, which makes up about 45% of all such students nationwide.
- Approximately 1.2 million newly SNAP-eligible undergraduate students at \$0 EFC attended public colleges in the 8 high-outreach states, which makes up about 33% of all such students nationwide.

Effective outreach can boost student participation in SNAP, which increases students' financial stability and improves their likelihood of completing degrees or certificates. Congress intended to help food-insecure students by expanding student eligibility, but states must step up. Students being failed as a result of weak outreach deserve more.

## Introduction and Background

Food insecurity can damage and even destroy the aspirations of students on America's college campuses. Study after study has recorded its widespread prevalence, including a recent national survey by The Hope Center. The survey found that one in three students experienced food insecurity in the thirty days before the survey and that difficulty obtaining or affording balanced meals made learning more difficult for students. Studies and personal narratives have also demonstrated the impact of food insecurity on student physical and mental wellbeing, academic performance, and ability to complete college and earn a credential.

One of the most effective ways to ensure stable food access is by signing students up for SNAP, the main federal program that helps students cover the cost of their daily food needs. SNAP provides monthly payments for food assistance to low-income families ranging from \$200 for an individual to several hundred dollars for families. Research shows that SNAP reduces food insecurity and lifts millions of people out of poverty each year.<sup>1</sup> SNAP enrollment is associated with higher retention rates among students.<sup>2</sup>

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Findings from a demonstration project that connected low-income students to public benefits showed that SNAP can increase students' financial stability and improve their likelihood of completing degrees or certificates.<sup>3</sup> As the cornerstone of the nation's nutrition assistance safety net, SNAP helps ensure low-income people have access to healthy, affordable food.<sup>4</sup>

Unfortunately, too few students in need enroll in SNAP. A [national Hope Center survey](#) found that of all students who experienced basic needs insecurity, only 24% at two-year colleges and 11% at four-year colleges reported participating in SNAP. In contrast, the national participation rate among income-eligible adults in the most recent year was 82%.

The primary obstacle to enrolling income-eligible students in SNAP is the program's restrictive and complex rules governing student eligibility. To qualify for SNAP, college students attending more than half time must qualify under at least one of the following student-specific criteria or "exemptions":

- responsible for a dependent child under the age of 6
- responsible for a dependent child between ages 6-12 for whom they have trouble securing child care
- receiving Temporary Assistance for Needy Families (TANF) cash assistance or TANF funded services, such as childcare or other TANF services
- single parent enrolled full-time and responsible for a dependent child age 12 or under
- participating in a state or federally funded work-study program, regardless of the number of weekly hours
- participating in an on-the-job training program
- in school through a local, state, or federally administered employment and training program
- considered "physically or mentally unfit" to both attend school and work part-time
- assigned to, placed in, or self-placed in a college or other institution of higher education through:
  - A SNAP Employment and Training ([SNAP E&T](#)) program;
  - Certain other E&T programs for low-income households, which are operated by a state or local government and have an equivalent component to SNAP E&T;
  - A program under the Workforce Innovation and Opportunity Act of 2014 (WIOA) ([PL 113-128](#));
  - A Trade Adjustment Assistance Program under Section 236 of the Trade Act of 1974.
- working at least 20 hours per week in paid employment

Recognizing the urgent need to make SNAP more accessible to students, the United States Department of Agriculture's Food and Nutrition Service (FNS) has identified college students as a priority population for state SNAP outreach plans.<sup>5</sup>

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However, the FNS can only do so much under the restrictions passed by Congress.

In December 2020, Congress at last took a modest step toward enabling food-insecure college students access to SNAP as part of comprehensive legislation responding to the pandemic. The Consolidated Appropriations Act of 2021 added two new types of exemptions that are straightforward, compared to the maze of pre-emergency student rule exemption categories:

- 1 Students who are eligible to participate in state or federally financed work-study during the regular school year.
- 2 Students who have an Expected Family Contribution (EFC) of \$0 in the current academic year. Students receive an EFC after applying for financial aid through the Free Application for Federal Student Aid or FAFSA. These are the lowest-income students.

The new exemption categories are time-limited. Once the federal COVID-19 PHE expires (currently scheduled for October 2022), students deemed eligible due to \$0 EFC and those eligible for federal or state work-study will lose coverage as their cases come up for recertification if they are not found eligible under another one of SNAP's student rule exemptions. Because the availability of expanded SNAP for students was understood from the outset to be temporary, it was essential for all responsible parties to market the program as promptly and as broadly as possible. Every student who fails to apply because they do not know about their potential eligibility is at unnecessary risk of food insecurity, academic disruption, and college dropout.

## Purpose and Methodology

When Congress expands eligibility for a benefit, it is natural to assume that the expansion will simply go into effect. In reality, however, a chain of handoffs must take place. This study explores how the implementation of expanded SNAP eligibility for students took place in its primary domain: state government agencies.

FNS sets baseline eligibility rules and benefit levels, based on federal law, and serves as their ultimate arbiter. But states administer SNAP. Each state designs its application process and interprets federal eligibility and benefit standards, resulting in notable differences from state to state. States are also responsible for conducting outreach to potentially SNAP-eligible residents and must file SNAP outreach plans with FNS.

The Hope Center sought to find out how—and if—states were fulfilling their vital role in notifying college students and college staff who advise students about the availability of expanded student SNAP eligibility. Anecdotally, it seemed clear that some states were taking their responsibility seriously. They proactively messaged college administrators and staff about the program, provided fliers and other collateral to be distributed to students, and convened coalitions with anti-hunger organizations to spread the word. Yet other states appeared to do little in the way of outreach, or worse, provided misinformation. In one state, for example, reports emerged of caseworkers erroneously telling students that the public health emergency had already lapsed and they no longer qualified for SNAP.

The Hope Center conducted a review of the websites of state social services agencies, higher education agencies, state higher education systems, and SNAP outreach partners in all 50 states to determine what states were communicating about expanded SNAP eligibility for students.

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Where available, we supplemented this scan with information on other outreach modalities, such as emails, fliers, and webinars. The scan sets a minimum benchmark for state implementation: making available eligibility information on the website of a relevant state entity.

We then sorted the states into three categories: those who provided no information on their websites (low outreach); those who provided at least basic information on their websites (some outreach); and those who included information on their websites and voluntarily took additional steps to inform students and college officials (high outreach).

Finally, we sought to understand the stakes of effective outreach by quantifying how many potentially eligible students reside in each state. The Century Foundation carried out a detailed analysis of undergraduate students attending public colleges in each state who potentially qualify for SNAP due to having \$0 EFC.<sup>6</sup> In 2022, the National Postsecondary Student Aid Study (NPSAS) provided state-level data for key financial aid fields for the first time, enabling the Century Foundation to probe more deeply than ever before into the population of low-income students in each state.<sup>7</sup> The Century Foundation carried the analysis a step further by netting out students who were either ineligible for SNAP due to immigration status or qualified under other exemptions. The qualifying exemptions estimated were age (under 18 or over 49), participation in work-study, or dependent who qualifies for an exemption.<sup>8</sup>

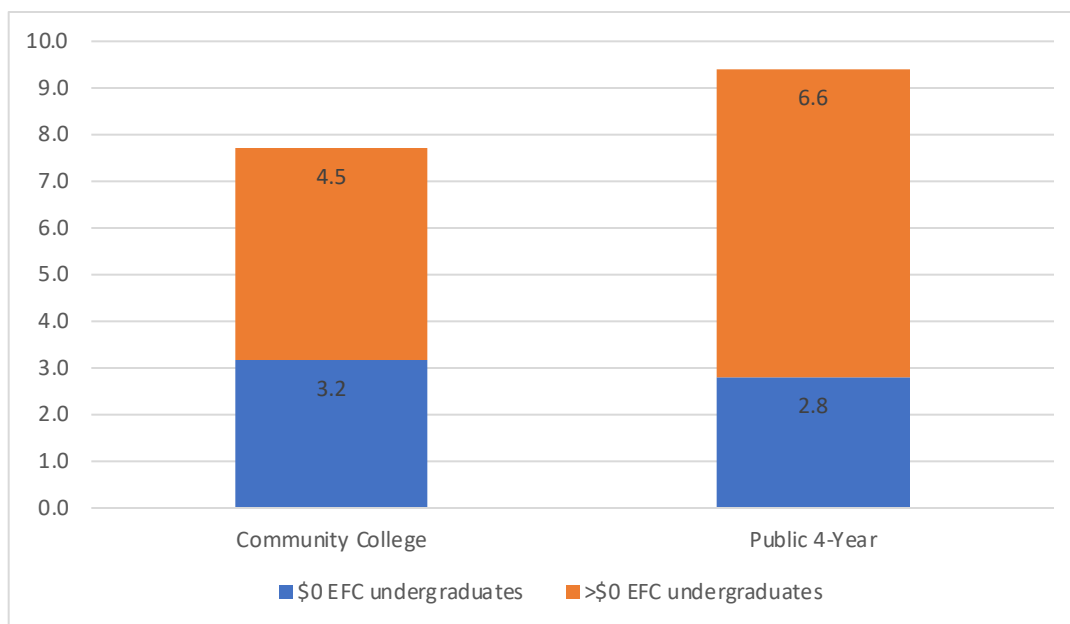
The resulting dataset provides the first state-level estimate of \$0 EFC undergraduate students. The estimate is incomplete due to a lack of comparable data on graduate students and students at private institutions. But it is nonetheless the first measurement to show the depth of the pool of potential beneficiaries of Congress's expansion: 3.5 million undergraduate students, about one in every five students at public colleges and universities.

## Findings

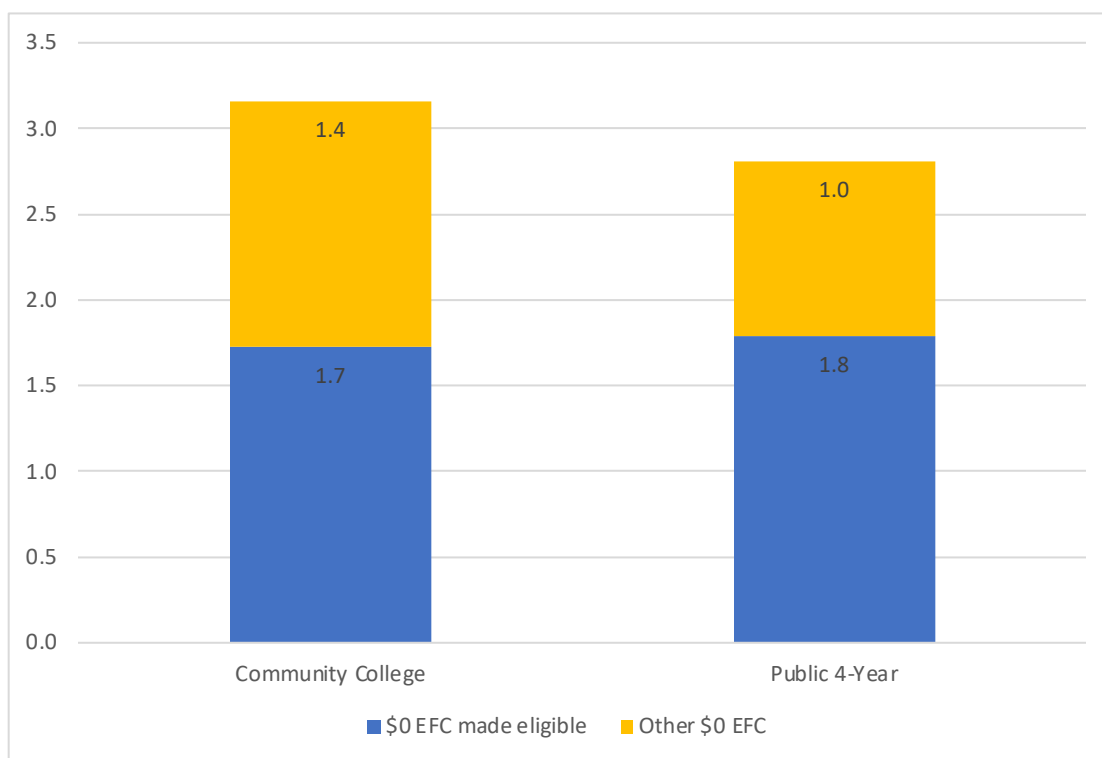
### *Population of Students Eligible for \$0 EFC Standard*

- Nationally, there were approximately 6 million undergraduate students at \$0 EFC undergraduate students in 2019-2020 at public colleges and universities, which is about 35% of all undergraduate students at public colleges and universities across the country.
- Approximately 3.5 million undergraduate students at \$0 EFC at public colleges and universities were made eligible by the PHE expansion. The other 2.5 million were estimated to be ineligible due to lack of U.S. citizenship or having a household income above the SNAP eligibility threshold or were already eligible for SNAP under permanent exemptions (Figure 1).
- Of the 3.5 million undergraduate students at \$0 EFC made eligible by the PHE expansion, roughly half attended community colleges (1.7 million), and the other half attended public four-year colleges and universities (1.8 million: Figure 2).

**FIGURE 1 | \$0 EFC AND NON-\$0 EFC UNDERGRADUATE STUDENTS (IN MILLIONS)**



**FIGURE 2 | \$0 EFC UNDERGRADUATE STUDENTS MADE ELIGIBLE DURING PUBLIC HEALTH EMERGENCY AND OTHER \$0 EFC UNDERGRADUATE STUDENTS (IN MILLIONS)**

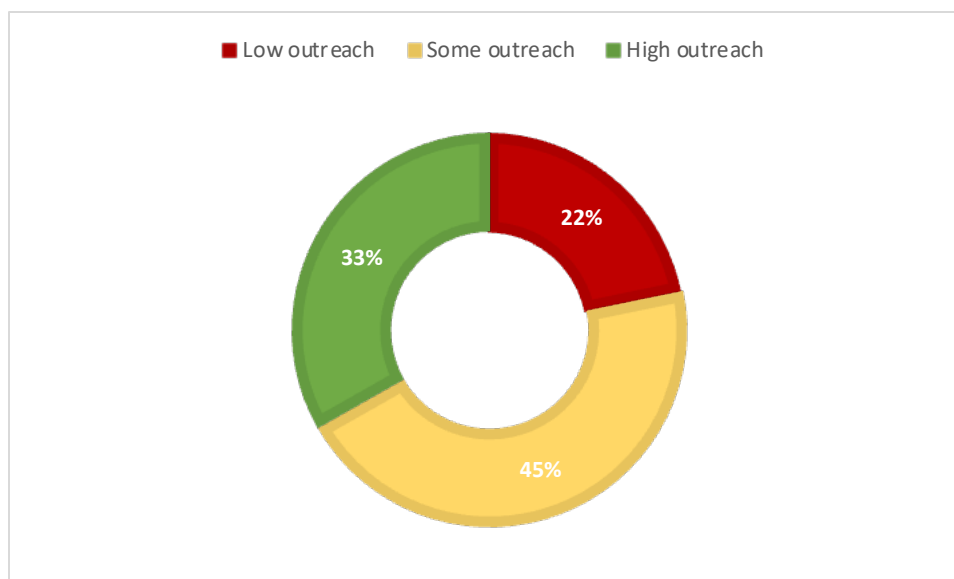


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### State Web-Based Promotion of Expanded SNAP

- 18 states did not post information on expanded SNAP eligibility for students on relevant websites. These states are likely to have conducted limited outreach and education activities around this important opportunity for college students experiencing food insecurity. Approximately 766,000 newly SNAP-eligible undergraduate \$0 EFC students attended public colleges in these states, which makes up about 22% of all such students nationwide (Figure 3).
- 25 states provided relevant information about expanded SNAP eligibility for students on state websites but did not use their websites to communicate or encourage the program's use in other ways. Approximately 1.6 million newly SNAP-eligible undergraduate \$0 EFC students attended public colleges in these states, which makes up about 45% of all such students nationwide (Figure 3).
- 8 states provided relevant information about expanded SNAP eligibility for students on state websites and took additional steps to communicate or encourage the program's use. Approximately 1.2 million newly SNAP-eligible undergraduate \$0 EFC students attended public colleges in these states, which makes up about 33% of all such students nationwide (Figure 3).

**FIGURE 3 | STUDENT POPULATION IN EACH EXPANDED SNAP ONLINE OUTREACH TIER**





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## *Promotion of the SNAP expansion by best-practice states*

The states that promoted the usage of expanded SNAP eligibility for students did so in various ways. Their strategies provide useful models for future outreach, although no data is available yet on the effectiveness of any individual strategy.

- Using income data from FAFSA, the Massachusetts Secretary of Higher Education sent a series of letters to students potentially eligible for SNAP due to the COVID-19 public health emergency. Notably, the Secretary told his own story of receiving SNAP benefits in college to relieve potential stigma among students who might consider applying.
- The Ohio Department of Higher Education partnered with the Ohio Association of Food Banks, the Center for Community Solutions, and a wide spectrum of colleges and universities to get the message out about expanded access to SNAP due to the COVID-19 public health emergency. The coalition convened a webinar, briefed financial aid and student affairs staff, disseminated fliers and other collateral to institutions and students, and conducted a detailed survey on SNAP education and outreach at the institutional level.
- State SNAP outreach partners have the expertise and resources to provide informational resources that colleges can use or adapt for their education and outreach activities to students. In New York, Hunger Solutions New York created a flier for distribution to students. In California, Cal State Chico's Center for Healthy Communities created a campus media toolkit, as well as promotion and social media resources for college use.

## **Conclusion**

Hundreds of thousands of college students likely eligible for the federal government's expanded SNAP eligibility program reside in states that do not seem to be informing students or institutional support staff about this program. As a result, these students are likely to miss the window for applying and receiving benefits that would help them remain focused on their academic aspirations. Furthermore, the weak outreach efforts apparent in so many states bodes poorly for the post-public health emergency phase, when students will need assistance to identify other exemptions that would enable them to continue receiving SNAP benefits.

State and federal policymakers must do more:

- States have a responsibility to inform college students about SNAP eligibility, both during the public health emergency and afterwards.
- States should identify students who are qualified for SNAP under the public health emergency and make plans to provide casework support to identify other exemptions for which the students may qualify when the emergency lapses.
- States should reframe their SNAP messaging to emphasize conditional eligibility, rather than a negative framing around ineligibility.
- Congress must maintain SNAP flexibilities for students with \$0 EFC and work study eligibility until the farm bill can be reauthorized in 2023.





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## Notes and References

<sup>1</sup> Food and Nutrition Service, US Department of Agriculture. (2021). [SNAP - Introduction of priority areas for state outreach plans](#).

<sup>2</sup> Carr, B. & London, R. (2020) [Healthy, housed, and well-fed: Exploring basic needs support programming in the context of university student success](#).

<sup>3</sup> Duke Benfield, A. & Saunders, K. (2017). [Benefits access for college completion: Lessons learned from a community college initiative to help low-income students](#). Center for Law and Social Policy.

<sup>4</sup> Center on Budget and Policy Priorities. (2022, January). [A quick guide to SNAP eligibility and benefits](#).

<sup>5</sup> U.S. Department of Agriculture, Food and Nutrition Service, (2022, June). [Supplemental Nutrition Assistance Program \(SNAP\) – Introduction of priority areas for state outreach plans](#).

<sup>6</sup> No data was available to carry out a similar analysis of the work study exemption.

<sup>7</sup> [National Postsecondary Student Aid Study](#). Data was fully available on \$0 EFC students in 35 states. The Hope Center imputed estimates of the \$0 EFC students in the other 15 states using median values from states provided.

<sup>8</sup> The Century Foundation estimate could not include students already SNAP-eligible due to other exemptions for which national data was unavailable, such as physical or mental disability or participation in career and technical education programs of study.



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