**College Students and SNAP**

Food insecurity is a prominent and consistent issue on college campuses, one that has remained acute during the COVID-19 pandemic. According to The Hope Center for College, Community, and Justice’s [#RealCollege 2021 report](https://hope4college.com/wp-content/uploads/2021/03/RCReport2021.pdf), 39% of students at two-year institutions and 29% at four-year institutions experience food insecurity, with higher rates among Black, Indigenous, LGBTQ, parenting students, and other marginalized groups.[[1]](#footnote-0)

The Supplemental Nutrition Assistance Program (SNAP) is the nation’s largest anti-hunger program. Research shows SNAP helps families afford adequate food and improve health outcomes,[[2]](#footnote-1) as well as reduce poverty.[[3]](#footnote-2) For eligible students, increased access to public benefits like SNAP has led to an increase in retention and college completion.[[4]](#footnote-3) Yet, many college students often find themselves excluded from the program due to restrictive eligibility requirements and confusing student eligibility rules.

College students have a small SNAP take-up rate even if they are income eligible and food insecure. According to the Government Accountability Office (GAO), 57% of students who were potentially eligible for SNAP and at risk of food insecurity were not enrolled in SNAP.[[5]](#footnote-4) In comparison, 82% of all eligible participants across the total population of adults received SNAP nationwide in 2019.[[6]](#footnote-5) According to the most recent Hope Center data, only 24% of students at two year institutions who experienced basic needs insecurity and 10% of students at four year institutions who experienced basic needs insecurity received SNAP benefits.[[7]](#footnote-6) In other words, SNAP’s eligibility restrictions uniquely fail to support students and hinders their ability to advance economically through postsecondary education.

The inability of students to access SNAP benefits is problematic in particular because an increasing number of students are older than the “traditional” college student, care for a dependent, and/or combine work full-time with college attendance.[[8]](#footnote-7) #RealCollege students often must wear multiple hats to make a college education a reality.

Higher education is rife with systemic barriers that make it harder for students to complete college. Students who are students of color, first-generation and/or low-income face even greater obstacles. Students with one or more of these identities can find themselves navigating an outdated system[[9]](#footnote-8) that perpetuates the idea that students are coming from white, middle-to-high income homes and are supported by their parents through their college journey. During the fall of 2020, The Hope Center found that 75% of Indigenous, 70% of Black, and 70% of American Indian or Alaska Native students experienced some form of basic needs insecurity compared to 54% of White students.[[10]](#footnote-9) These stark differences are not new; however, they highlight just how students of color are disproportionately affected when it comes to student basic needs insecurity, especially during an unprecedented time like the COVID-19 pandemic.

Students enrolled in a higher education institution at least half-time must meet one of several exemptions to qualify for SNAP. These exemptions include working 20 hours per week, participating in a work-study program, a single parent and caring for a dependent child under 12, participating in an employment and training program, or among other exemptions found in Appendix A.

In response to the COVID-19 pandemic, the Consolidated Appropriations Act (CAA) of 2021 eased some of the student restrictions in SNAP.[[11]](#footnote-10) The CAA temporarily increased eligibility for students enrolled at least half-time in an institution of higher education who had an expected family contribution (EFC) of zero[[12]](#footnote-11) for the academic year and students who are eligible for state or federal work-study, even if they aren’t participating. The rules during the COVID-19 public health emergency were estimated to expand SNAP access for up to 3 million students who did not previously qualify for SNAP.[[13]](#footnote-12) The SNAP expansions through the Consolidated Appropriations Act of 2021 is a great example of policy that expands student eligibility, simplifies eligibility criteria, and ultimately allows a larger number of food-insecure students to receive vital assistance.

Yet, the temporary changes do not address the permanent eligibility restrictions students face because SNAP and other public benefit programs ultimately promote a “work first” philosophy. These outdated rules discourage postsecondary attendance in an economy in which the vast majority of jobs being created require some form of postsecondary credential.[[14]](#footnote-13) Public benefit programs should promote college attendance as one of the highest priorities if we are going to foster the workforce our economy requires. In the wake of an unprecedented pandemic and the necessity of postsecondary education for quality employment, students need support improving their most basic need for food, beginning with fixing current SNAP student eligibility rules.

**Background on SNAP and Students**

SNAP, once known as the Food Stamp Program, was permanently implemented in 1964 through the Food Stamp Act and has become an essential program for low-income families across the U.S. The US Department of Agriculture (USDA) administers SNAP as an entitlement program, meaning it expands as population need for the program increases to reflect the needs of the economy, which can best be illustrated through the COVID-19 pandemic. For fiscal year 2021, USDA reported that over 21 million households across the country were receiving food assistance benefits.[[15]](#footnote-14) The need for SNAP increased with the uncertainties brought on by the pandemic. SNAP benefits are completely funded by the federal government, who share the costs of administration with states, allowing states flexibility to administer their SNAP program based on state needs. This flexibility allows states to implement certain program requirements with discretion that can impact how all people, especially students, access the program.

To receive SNAP benefits, a person must meet federal guidelines involving income and assets, household qualifications, and immigration status requirements. To meet the income and asset eligibility requirements, a household’s gross monthly income must fall at or below 130% of the federal poverty line (FPL); a household’s net income must be at or below the poverty line; and its assets must fall below certain limits set by the state.[[16]](#footnote-15) Or, the household may be categorically eligible for SNAP. Applicants eligible for or receiving benefits from the Temporary Assistance for Needy Families (TANF) program, Supplemental Security Income, or state financed General Assistance automatically (or categorically) qualify for SNAP.[[17]](#footnote-16)

Over the years, a variety of states have adopted what is called “broad-based” categorical eligibility (BBCE), which allows states to raise the gross income limit up to 200% of the FPL and allow qualifications through TANF benefits and services.[[18]](#footnote-17) The regular federal gross income limit can create an economic “cliff effect” by abruptly cutting participants off benefits as soon as they hit the 130% of the FPL. For a family of three in 2022, 130% of the FPL translates to $23,030 annually or $1,919 monthly,[[19]](#footnote-18) which isn’t enough for a family to live off of and leaves families in a similar position they started in.

A person’s household and immigration status will also be examined. Undocumented and Deferred Action for Childhood Arrivals (DACA) individuals are not eligible for SNAP, as well as lawfully present immigrants unless they meet one of the [eligibility requirements](https://www.fns.usda.gov/snap/eligibility/citizen/non-citizen-policy). However, states have the ability to provide assistance to ineligible qualified immigrants with their own state funded program. Currently, six states, including California, Connecticut, Illinois, Maine, Minnesota, and Washington, provide SNAP benefits to certain noncitizens who were deemed ineligible by the Personal Responsibility and Work Opportunity Act of 1996, although program eligibility varies by state.[[20]](#footnote-19)

Once participants meet the above criteria, SNAP recipients are required to register for work, participate in SNAP Employment and Training or workfare if assigned, take a suitable job if offered, and not voluntarily quit a job or reduce work hours below 30 a week without good reason,[[21]](#footnote-20) unless exempt.[[22]](#footnote-21) States have the option to limit unemployed adults without children in the home who do not have disabilities to three months of SNAP benefits every three years, unless they are working or in a work or training program, and nine states have done so.[[23]](#footnote-22) These requirements are meant to encourage work and move recipients off of benefits as soon as possible. However, they stem from the U.S.’s racist history behind assumptions of people on welfare programs.[[24]](#footnote-23) At its core, work requirements perpetuate the idea of deservingness, and promotes the idea that people need to be coerced to work.[[25]](#footnote-24)

| Participants can also participate in SNAP’s Employment and Training (E&T) program to meet work requirements, which aims to address barriers individuals may face while finding work by providing training, education, and supportive services. Each state is required to operate a SNAP E&T program that provides assistance through different allowable components, including occupational training and education. Funding for SNAP E&T programs allows states to build their own program, so a program can vary in components offered, state funding for the program, participation requirements, and expenditures per participant.[[26]](#footnote-25) Over the years, the program’s 50/50% reimbursement funds have been used to expand the education component, as most states seek out “third-parties” to offer more services to participants through partnerships with community-based organizations, non-profits, and community colleges. Partnerships with community colleges allow students to receive some reimbursement for tuition, fees, or other student assistance like transportation, childcare, textbook costs, which further supports their attainment of postsecondary education. |
| --- |

For students, SNAP determines eligibility based on enrollment status. A student enrolled less than half-time must follow the same eligibility criteria as people not enrolled in college and are subject to SNAP’s work requirement. A student enrolled at least half-time in an institution of higher education, and who meets income, household and citizenship requirements must meet separate eligibility criteria. Federal law has placed some limits on SNAP eligibility for students, contributing to the misunderstanding that all students attending college are ineligible. However, students enrolled in at least 6 credits per semester can qualify by meeting one of the following criteria:

* Working 20 hours a week
* Caring for a dependent child under the age of 6
* Caring for a child age 6 to 11 and lack the necessary child care enabling you to attend school and work 20 hours a week or participate in work study
* Receiving Temporary Assistance for Needy Families (TANF) cash assistance or services
* Age 17 or younger or age 50 or older
* Single parent enrolled full-time and caring for a dependent child age 12 or under
* Participating in a state or federally funded work-study program
* Participating in an on-the-job training program
* Physically or mentally unfit
* Are 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](https://snaptoskills.fns.usda.gov/about-snap-skills/what-is-snap-et)) 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 Workforce Innovation and Opportunity Act of 2014;
  + A Trade Adjustment Assistance Program under Section 236 of the Trade Act of 1974.
* Enrolled in a TANF Job Opportunities and Basic Skills program

A list of all requirements can also be found in Appendix A, including the temporarily increased eligibility of students with an expected family contribution (EFC) of zero for the academic year and students eligible for state or federal work-study. The several exemptions are a result of outdated perspectives about who students are and the emphasis on low-wage work over education. A student who is studying and attending class is working, yet student eligibility does not consider it as such, which can hinder a student’s full time academic progress. However, states have discretion in how they administer certain eligibility rules like categorical eligibility, work requirements, work-study, and their employment and training program.

**State-by-State Student Rules in SNAP**

Through an administrative research scan of state-by-state policy manuals, the table below showcases information found on state rules for students pursuing higher education more than half-time.[[27]](#footnote-26) By looking across states, we can examine which states are expanding access and eligibility to their fullest potential, which states could go further, and how best to inform outreach strategies to students who may be eligible for SNAP but are not currently receiving benefits. The state manuals gave insight into how work hours are averaged to meet eligibility; how a state is interpreting work-study requirements (not shown in table); and whether states are implementing the Carl D. Perkins Career and Technical Education Act of 2006 provision as a qualifiable SNAP E&T program. In all of these areas, states have jurisdiction to make a difference in a students’ ability to access and receive SNAP benefits long-term.

**Table 1: State Student Eligibility Rules[[28]](#footnote-27)**

| State | Categorical Eligibility | Hours of Work Averaged Across | Utilizes Carl D. Perkins Career and Technical Education Act of 2006 |
| --- | --- | --- | --- |
| Alabama | 130%, no asset limit | month | no |
| Alaska | No BBCE | week | no |
| Arizona | 185%, no asset limit | month | no |
| Arkansas | No BBCE | month | no |
| California | 200%, no asset limit | month | no[[29]](#footnote-28) |
| Colorado | 200%, no asset limit | month | no |
| Connecticut | 185%, no asset limit | week | no |
| Delaware | 200%, no asset limit | week | no |
| D.C. | 200%, no asset limit | week | no |
| Florida | 200%, no asset limit | month | no |
| Georgia | 130%, no asset limit | week | no |
| Hawaii | 200%, no asset limit | week | no |
| Idaho | 130%, 5K asset limit | month | no |
| Illinois | 165% no asset limit | week | yes |
| Indiana | 130%, 5K asset limit | month | no |
| Iowa | 160%, no asset limit | week | no |
| Kansas | No BBCE | month | no |
| Kentucky | 200%, no asset limit | month | no |
| Louisiana | 130%, no asset limit | week | yes |
| Maine | 185%, no asset limit | month | no[[30]](#footnote-29) |
| Maryland | 200%, no asset limit | week | no |
| Massachusetts | 200%, no asset limit | month | yes |
| Michigan | 200%, 15K asset limit | week | yes |
| Minnesota | 165%, no asset limit | week | yes |
| Mississippi | No BBCE | month | no |
| Missouri | No BBCE | week | no |
| Montana | 200%, no asset limit | week | no |
| Nebraska | 130%, 25K liquid asset limit | month | yes |
| Nevada | 200%, no asset limit | week | no |
| New Hampshire | 185%, no asset limit | month | no |
| New Jersey | 185%, no asset limit | week | no[[31]](#footnote-30) |
| New Mexico | 165%, no asset limit | month | no |
| New York | 200% & 150%, no asset limit | week | yes |
| North Carolina | 200%, no asset limit | month | no |
| North Dakota | 200%, no asset limit | month | no (no standard either) |
| Ohio | 130%, no asset limit | week | no |
| Oklahoma | 130%, no asset limit | month | yes |
| Oregon | 185% no asset limit | month | yes |
| Pennsylvania | 160%, no asset limit | week | yes |
| Rhode Island | 185%, no asset limit | week | yes |
| South Carolina | 130%, no asset limit | week | no |
| South Dakota | No BBCE | month | no |
| Tennessee | No BBCE | month | no |
| Texas | 165%, asset limit of $5,000 (excludes 1 vehicle up to $15,000 & includes excess vehicle value) | week | no |
| Utah | No BBCE | month | no |
| Vermont | 185%, no asset limit | week | no |
| Virginia | 200%, no asset limit | month | yes |
| Washington | 200%, no asset limit | month | no |
| West Virginia | 200%, no asset limit | month | no |
| Wisconsin | 200%, no asset limit | semester | no[[32]](#footnote-31) |
| Wyoming | No BBCE | month | no |

As shown above, a states’ gross income limit and asset limit in regard to BBCE rules are also included in the research and are the only information retrieved outside state manuals. Information included in Appendix B comes from [USDA’s BBCE States Chart](https://www.fns.usda.gov/snap/broad-based-categorical-eligibility). As of February 2022, there are 44 states who utilize BBCE. BBCE allows states to implement gross income limits up to 200% of the poverty line and to remove an asset limit, which is usually two of the most restrictive tests in general federal eligibility. Of the 44 states, 19 states expanded the gross income limit to 200%, while nine states kept their gross income limit at 130% of the FPL. Under BBCE, states are also allowed to eliminate asset limits and 37 states have already done so. By having a no asset limit, families can accumulate assets to better support themselves in the long run without worrying about being disqualified for SNAP. The following nine states do not allow BBCE: Alaska, Arkansas, Kansas, Mississippi, Missouri, South Dakota, Tennessee, Utah, and Wyoming.

When looking at work hour requirements, a student must work 20 hours a week on top of their studies to maintain eligibility. However, each state can determine whether students’ hours can be averaged across a week, month, or semester/quarter. As illustrated in Appendix A, federal rule says “the [State](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=3d9b864f1668a3f5f45e349267ab7011&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) agency may choose to determine compliance with this requirement by calculating whether the student worked an average of 20 hours per week over the period of a month, quarter, trimester or semester.”[[33]](#footnote-32) After examining each state’s administration manual, it was found that 23 states average hours across the week. States who average per week fail to recognize that students’ work schedules can fluctuate frequently, as well as course loads and unforeseeable emergencies that may arise. Whereas, 27 states currently average work hours across the month. By averaging by month, students are allowed some flexibility in how many hours they can work each week, as long as they meet the 80-hour requirement by the end of the month. The state of Wisconsin is the only state who averages work hours across a semester.

When analyzing work-study, federal regulations state that “the student must be approved for work study at the time of [application](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=8ed8e5a89b0e4715cd0abedd7837d660&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) for SNAP benefits, the work study must be approved for the school term, and the student must anticipate actually working during that time”.[[34]](#footnote-33) Prior to the CAA, California was the leading state to examine the definition of “anticipating participation” to acknowledge that as long as a student plans to participate in the work-study program and will be participating once made available, a student should not be penalized or excluded from SNAP benefits. Their manual explains, “… a student shall be deemed to be ‘anticipating participation’ in work study until he or she receives notices from the institution of higher education that he or she has been denied participation in work study’... ‘a work study job assignment which has not yet begun or is not yet available does not prevent the student from meeting the criteria for this exemption”.[[35]](#footnote-34) Since California is the main state leading the conversation, work-study was not included in Appendix B.

It is also important to highlight that some states allow student benefits to carry through vacations, semester/quarter breaks or general breaks, but can vary in time frames. For instance, Arizona allows work-study to continue through vacations or breaks between semesters or quarters, as long the student will resume work-study once classes resume, whereas Michigan specifies that the break must be less than a month for benefits to continue. All states must require work-study as an acceptable eligibility requirement, but states can either take a flexible or strict approach.

This research also looked to see whether a state manual includes the Carl D. Perkins Career and Technical Education Act of 2006 as an acceptable employment and training program. The federal student rules lists this as one of four acceptable programs. Based on the manuals found, only 12 states have updated their manuals to include eligibility through the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins V). By including Perkins V in eligibility rules, states are expanding employment and training programs to include college students enrolled in Career and Technical Education programs. The other 39 states do not utilize the Perkins V definition and focus on employment and training programs operated by state and local governments for low-income households.

**Recommendations for State Policymakers**

As college campuses continue to navigate college food insecurity, it is time the federal and state governments permanently address expanding eligibility for college students across the country. An increasing number of college campuses are coming up with innovative solutions to address campus hunger (i.e. Hunger-Free Campus Laws[[36]](#footnote-35)), yet restrictive SNAP eligibility is doing a disservice to students by limiting access due to an outdated idea of who a typical college student is.

After analyzing state manuals from across the nation, it is apparent that information regarding student rules is not easily available to students. Searching through multiple sites to obtain state manuals complicated the process and led to some missing or outdated information. We recommend that the USDA-Food and Nutrition Service (FNS)’s “State Nutrition Options Report” track current student rules within all states, as this would result in more accessible information for students, colleges, universities, and state advocates. Currently, the USDA-FNS has a “Student” page, which includes federal student eligibility rules and a state directory of resources that redirects students to their state SNAP page. However, a limited amount of those redirected SNAP pages actually include college student information. Without having college student information easily available, states are continuing to illustrate why there is a disconnect in student access to SNAP benefits. Making student resources and eligibility information accessible can work to reduce the lack of awareness and knowledge regarding SNAP.

Additionally, although there is much research surrounding the gravity of food insecurity among college campuses, there are still many states who are not maximizing eligibility for students. States should work to expand eligibility requirements by:

* **Maximizing Broad-Based Categorical Eligibility to 200% of the poverty line with no asset limit.** The majority of states are already implementing BBCE, however, out of those 44 states, only 18 states set eligibility to 200% of the FPL with no asset limit. Currently, Indiana and Idahoare two states who use BBCE, yet they remain at 130% of the poverty line and include $5,000 asset limits. Instead of making it easier, they continue to include barriers that make it harder for students to qualify for benefits. Additionally, the nine states (Alaska, Arkansas, Kansas, Mississippi, Missouri, South Dakota, Tennessee, Utah, and Wyoming) that are not using BBCE are excluding families from benefits who might otherwise be eligible for SNAP. Utilizing BCCE to its full extent can help alleviate restrictive administrative rules like the asset limit test and can support more students to qualify for SNAP.
* **Averaging work hours across month or semester.** Based on Hope’s research of state manuals, Wisconsin is currently the only state who allows students to average their work hours across a semester. Wisconsin explains “compliance can be determined by calculating whether the student worked an average of 20 hours per week over the period of a month, a quarter (calendar), a trimester (Fall, Winter, Spring), or a semester (Fall semester (1st) and Spring semester (2nd ). This is in line with the different ways contractual and fluctuating employment is budgeted.”[[37]](#footnote-36) Wisconsin allows flexibility within work hours and sends a message that students should not have to live in fear of losing their benefits for circumstances that may be out of their control. The 25 states who average across a week should look at expanding work across the month.
* **Expanding work-study eligibility**: California’s interpretation of “anticipating participation” serves as an example of ways states can expand eligibility through work-study. Their state manual highlights that students can be considered eligible for SNAP, as long as the student anticipates participating, even if the job has not yet started or been assigned yet. Maryland is another example of how they are expanding eligibility. Maryland included a note within their work-study rule to state that for students given exemptions because of anticipated work-study, they will not be penalized if it does not materialize. On the other hand, states like Arizona move away from practices like California and Maryland and take a more strict approach by requiring a student “be working at a job and receiving earnings or tuition credit for the work performed.”[[38]](#footnote-37) More states should work to expand eligibility within work-study so students are able to maximize the time they can receive benefits.
* **Allowing Career and Technical Education** **students to qualify.** Although the manual may not represent all states who have transitioned to include Career and Technical Education students due to outdated content, it is still a great reminder that there are still many states who may not be utilizing Perkins V to support a broader range of students. Michigan is a recent state who expanded its SNAP E&T definition to include Perkins V as a result of the COVID-19 pandemic. Their inclusion of Perkins V has resulted in almost 16,000 low-income students qualifying for SNAP benefits.[[39]](#footnote-38) More states should follow in Michigan’s footsteps to support a growing number of CTE students who may not have qualified for benefits otherwise.

**Appendix A: Federal Student Eligibility Rules** *(adapted from* [*Cornell’s Regs*](https://www.law.cornell.edu/cfr/text/7/273.5)*)*

| **§ 273.5 Students.**  **(b) *Student Exemptions:* To be eligible for the** [**program**](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5)**, a student must meet at least one of the following criteria.** |
| --- |
| (1) Be age 17 or younger or age 50 or older; |
| (2) Be physically or mentally unfit; |
| (3) Be receiving Temporary Assistance for Needy Families; |
| (4) Be enrolled as a result of participation in the Job Opportunities and Basic Skills [program](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5); |
| (5) Be employed for a minimum of 20 hours per week and be paid for such employment or, if self-employed, be employed for a minimum of 20 hours per week and receive weekly earnings at least equal to the Federal minimum wage multiplied by 20 hours. The State agency may choose to determine compliance with this requirement by calculating whether the student worked an average of 20 hours per week over the period of a month, quarter, trimester or semester**.** State agencies may choose to exclude hours accrued during academic breaks that do not exceed one month. A State agency that chooses to average student work hours must specify this choice and specify the time period over which the work hours will be averaged in its State plan of operation; |
| (6) Be participating in a [State](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=3d9b864f1668a3f5f45e349267ab7011&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) or federally financed work-study [program](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) during the regular school year.  (i) To qualify under this provision, the student must be approved for work-study at the time of application for SNAP benefits, the work-study must be approved for the school term, and the student must anticipate actually working during that time. The exemption shall begin with the month in which the school term begins or the month work-study is approved, whichever is later. Once begun, the exemption shall continue until the end of the month in which the school term ends, or it becomes known that the student has refused an assignment.  (ii) The exemption shall not continue between terms when there is a break of a full month or longer unless the student is participating in work-study during the break. |
| (7) Be participating in an on-the-job training program. |
| (8) Be responsible for the care of a dependent household member under the age of 6; |
| (9) Be responsible for the care of a dependent household member who has reached the age of 6 but is under age 12; |
| (10) Be a single parent enrolled in an [institution of higher education](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=24d93fba2a75a9ae1b062bea5af107e8&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) on a full-time basis (as determined by the institution) and be responsible for the care of a dependent child under age 12. |
| (11) Be assigned to or placed in an institution of higher education through or in compliance with the requirements of one of the [programs](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) identified below. The [programs](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) are:  (i) A [program](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) under the [Job Training Partnership Act](https://www.law.cornell.edu/topn/job_training_partnership_act) of 1974;  (ii) An employment and training [program](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) under § 273.7, subject to the condition that the course or [program](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) of study, as determined by the State agency:  (A) Is part of a [program](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) of career and technical education as defined in section 3 of the Carl D. Perkins Career and Technical Education Act of 2006 designed to be completed in not more than 4 years at an institution of higher education as defined in section 102 of the Higher Education Act of 1965;  (B) is limited to remedial courses, basic adult education, literacy, or English as a second language.  (iii) A [program](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) under section 236 of the Trade Act of 1974; or  (iv) An employment and training program for low-income households that is operated by a State or local government where one or more of the components of such a program is at least equivalent to an acceptable SNAP employment and training [program](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=813914c6e80124895f92ced61852457b&term_occur=999&term_src=Title:7:Subtitle:B:Chapter:II:Subchapter:C:Part:273:Subpart:C:273.5) component. |

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27. Note for year–the state manuals found all had very different dates mostly ranging from 2019-22 (with the occasional 2017, 2018 and even 2010). [↑](#footnote-ref-26)
28. All state student eligibility rules were gathered from a state’s respective policy and administration manual and [USDA’s BBCE States Chart](https://fns-prod.azureedge.net/sites/default/files/resource-files/BBCE%20States%20Chart%20%28July%202021%29.pdf). If you are interested in more information about a specific source, feel free to contact: Leslie Rios ([Leslie.rios@temple.edu](mailto:Leslie.rios@temple.edu)). [↑](#footnote-ref-27)
29. Instead, California uses 273.5(b)(11) to allow students attending a program that increases employability to qualify for benefits. These programs can range from federally-funded programs (i.e. McNair Scholars Program) to state-funded programs for current and former foster youth (i.e. Chafee Education and Training Voucher Program) to local programs located on the [CalFresh Resource Center Policy Page](https://www.cdss.ca.gov/inforesources/calfresh-resource-center/policy) under “Student Resources''. These programs include a good number of CTE programs. [↑](#footnote-ref-28)
30. Maine does not include this provision in their manual. Instead, they use 273.5(b)(11)(iv) to define an education program that directly enhances employability as equivalent to a SNAP E&T program component. However, on [Maine’s DHHS website](https://www.maine.gov/dhhs/ofi/programs-services/food-supplement), they further expand that not only do courses that increase employability are allowed, but also community colleges can verify students enrolled in an associate’s or certificate program that are considered a CTE program, as defined as the federal Carl D. Perkins Act. [↑](#footnote-ref-29)
31. New Jersey does not include this provision in their manual. However, NJ’s [DHS website](https://www.nj.gov/humanservices/njsnap/students/eligibility/) includes that students enrolled in an approved CTE program at a NJ community college are eligible. [↑](#footnote-ref-30)
32. Wisconsin does not include this provision in their manual. Instead, they include that educational programs made to be completed in two years or less and are expected to lead to employment are considered to meet eligibility. [↑](#footnote-ref-31)
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