

## States Leading the Way in SNAP Eligibility and SNAP Outreach To Students

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Across the country, food insecurity is harming college students' ability to achieve their educational and professional goals. Numerous studies have shown its widespread prevalence, including a [national survey conducted by The Hope Center for College, Community, and Justice](#)—fielded in fall 2020—which found that one in three students experienced food insecurity. Difficulty obtaining or affording balanced meals makes it more challenging for students to learn.

One of the most effective ways to ensure stable food access is by signing students up for the Supplemental Nutrition Assistance Program (SNAP). Food insecurity reduces students' odds of earning a degree, and SNAP reduces food insecurity.<sup>1</sup> SNAP enrollment is associated with higher retention rates among college students.<sup>2</sup> 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>

Unfortunately, too few students with need actually enroll in SNAP. [The Hope Center's national survey](#) found that of all students who experienced basic needs insecurity, only 24% at two-year colleges and 11% at four-year colleges used SNAP. This confirms the findings of Virginia, the only state with the capacity to track student SNAP enrollment, which found that only 11% of likely income-eligible students were enrolled in SNAP. In contrast, more than 80% of eligible adults nationwide receive SNAP benefits.<sup>4</sup>

The biggest obstacle to enrolling students in SNAP is its complex array of restrictive eligibility rules. Students enrolled in college at least part-time can only qualify for SNAP by meeting one of the following criteria:<sup>5</sup>

- 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

*This brief is the first in a series focusing on innovative policies that states have implemented to assist students with their basic needs security. We're highlighting best practices across the country so that states can build a postsecondary landscape in which students have equitable access to the resources they need to meet their basic needs and succeed in college.*

*In this brief, we discuss the restrictive eligibility rules of the Supplemental Nutrition Assistance Program (SNAP) that discourage students from applying. We describe the eligibility criteria, and detail state-level innovations that are making SNAP more accessible for students facing basic needs insecurity.*

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- 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.
  - Work at least 20 hours per week in paid employment

Students struggle to navigate this maze of eligibility restrictions, which confuse government caseworkers and state agency officials as well. College staff often do not encourage students to apply for SNAP because they cannot say with certainty whether the students will qualify, or because they believe that the students are likely to be turned down. Students remain trapped in a system that is failing them.

## State Innovations in SNAP Eligibility

The federal government sets SNAP benefit levels and income eligibility rules, however, states have the power to determine whether individuals or households meet other program eligibility requirements. This authority creates an opportunity for states to adopt expansive policies around student eligibility.

Enrollment in programs for employment and training presents a key opportunity for maximizing SNAP eligibility. These programs must be operated by a state or local government, target low-income households, and increase the participant’s employability. States should designate specific educational programs to qualify as employment and training. States and colleges then refer students enrolled in the designated employment and training to the state SNAP agency to determine eligibility for SNAP benefits.

**Massachusetts** developed regulations in 2010 that enable students at community colleges who are enrolled in a “program as determined by the Department [of Transitional Assistance] likely to lead to employment” to qualify for SNAP.<sup>6</sup> Many programs of study can demonstrate a likelihood of employment, making this a promising way for maximizing student SNAP eligibility.

**California** enacted AB 396 in October 2021, creating a system not only for determining student eligibility based on what the California Department of Social Services (CDSS) calls Local Programs that Increase Employability (LPIEs) but for identifying which programs qualify as LPIEs.<sup>7</sup> All campuses in the California State University and California Community Colleges systems must submit qualifying programs by September 1, 2022. Programs must meet two standards to qualify as LPIEs: they must be government-run and have a direct link to employment. Notably, California programs eligible for SNAP under AB 396 include not only degree-seeking programs of study but also campus-based student success programs.<sup>8</sup>

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**New York** expanded student access to SNAP eligibility in October 2020 to include students at community colleges and similar institutions enrolled in a career and technical education program.<sup>9</sup> Career and technical education programs are defined by the Carl D. Perkins Career and Technical Education Act.<sup>10</sup> The definition is an expansive one, extending to students seeking a certificate or associate degree and potentially inclusive of a large population of low-income, food-insecure students.

States have discretion to determine how students carrying out required work activities report those work activities. States that mandate participants to work 20 hours per week each week of eligibility impose an unnecessary burden on students, whose academic calendar includes weeks where the time available for work is scarce. A better approach is to allow students to average work hours over a longer period. For example, **Wisconsin** permits students to average work hours across a semester, enabling them to reduce hours during midterms and final exams and then increase hours during academic breaks.<sup>11</sup>

## State Innovations in SNAP Outreach

Expanding SNAP eligibility only helps students if they learn about their potential eligibility and act on what they have learned. Therefore, it is crucial for states to supplement activities around eligibility with support for outreach. The United States Department of Agriculture Food and Nutrition Service, which oversees SNAP administration, has identified college students as a priority population for state SNAP outreach plans.<sup>12</sup>

In April 2022, **Virginia** enacted HB 582, which requires public colleges to ensure that all students have access to information about SNAP.<sup>13</sup> The bill also mandates that they advertise the application process on the institution's website, in orientation materials for new students, and in at least one campus-wide email per year.

In **California**, AB 2810 would require California State University and California Community College campuses to notify students who may be financially eligible for CalFresh (SNAP) benefits.<sup>14</sup> Like Virginia's law, AB 2810 would require an email notification to students. However, AB 2810 takes an additional step of requiring institutions to use data from the Free Application for Federal Student Aid (FAFSA) to identify students who meet income requirements of the CalFresh program. Thus, emails would go only to students likely to be income-eligible for CalFresh.

## Summary

Improving SNAP eligibility and outreach for college students should be irresistible for states: it improves the odds that students will academically thrive, graduate on time, and join the skilled workforce to meet employers' needs. Best of all, the federal government picks up the entire cost of the benefit and half the cost of administration. Yet many states presently underuse this vital resource.

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State policymakers, relevant state agencies, and state legislative committees should review administrative procedures for SNAP eligibility and take following actions:

- Expand eligibility to students in programs that expand employability or which can be identified as career and technical education programs;
- Consider other opportunities to clarify or expand eligibility, such as reviewing the definition of “mentally or physically unfit” or “participating in state or federal work-study”;
- Ensure that students with work requirements have the flexibility to average their work activities over a month or a semester;
- Conduct extensive training and technical assistance to demystify the application process for institutions and county or state caseworkers.

In addition, states should leverage colleges’ unique capacity to reach students by setting forth consistent minimum expectations for SNAP outreach and supporting institutional staff and faculty in meeting those expectations.

The combination of clear and expansive eligibility standards with proactive, consistent communication promises to significantly increase student participation in SNAP. Students deserve more than a failed status quo. Policymakers in all states should seek opportunities to take bold actions to meet students’ basic needs.

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## Notes and References

- <sup>1</sup> Canning, P., & Stacy, B. (2019, July). [\*The Supplemental Nutrition Assistance Program \(SNAP\) and the economy: New estimates of the SNAP multiplier\*](#). U.S. Department of Agriculture, Economic Research Service.; Wolfson et al. (2021). [\*The effect of food insecurity during college on graduation and type of degree attained: Evidence from a nationally representative longitudinal survey\*](#). Public Health Nutrition.
- <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> Center for Law and Social Policy (2017). [\*Benefits access for college completion\*](#).
- <sup>4</sup> U.S. Department of Agriculture, Food and Nutrition Services (2022, March). [\*Trends in USDA SNAP participation rates: FY 2016-2019\*](#).
- <sup>5</sup> In addition, Congress established two temporary exemptions that will expire when the federal Covid-19 public health emergency is allowed to lapse: Students who are eligible to participate in state or federally financed work study during the regular school year; and students who have an Expected Family Contribution (EFC) of \$0 in the current academic year.
- <sup>6</sup> Massachusetts Department of Transitional Assistance. 106 CMR 362.410 (F)(3). This is the social services agency for the Commonwealth of Massachusetts.
- <sup>7</sup> [California AB 396](#)
- <sup>8</sup> These programs include the Educational Opportunity Program, the Foster Youth Success Initiative, and the Mathematics, Engineering, Science Achievement (MESA) Program.
- <sup>9</sup> New York State Office of Temporary and Disability Assistance (2020, October). [\*Administrative directive memorandum 20-ADM-13 to social services district commissioners\*](#).
- <sup>10</sup> [Carl D. Perkins Career and Technical Education Act of 2006](#), as amended by Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act of 2019, Sec. 3 (5). 20 U.S.C. 2302
- <sup>11</sup> [FoodShare Wisconsin Technical Handbook](#), Section 3.15.1
- <sup>12</sup> U.S. Department of Agriculture, Food and Nutrition Service, (2021, June). [\*Supplemental Nutrition Assistance Program \(SNAP\) – Introduction of priority areas for state outreach plans\*](#).
- <sup>13</sup> [Code of Virginia Chapter 483, 23.1-409.1. HB 582](#)
- <sup>14</sup> [California Assembly Bill 2810](#)



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