Waiver Request- Connecticut

1. Type of request: Initial

2. Primary regulation citation: 7 CFR 273.5(a), 7 CFR 273.5(b)

3. State: Connecticut

4. **Region:** Northeast

- 5. **Regulatory requirements:** 7 CFR 273.5(a) states that students enrolled at least half-time at an institution of higher education are ineligible for SNAP unless they meet an exemption. 7 CFR 273.5(b) lists the exemptions that allows eligibility for a student enrolled at least half-time at an institution of higher education.
- 6. **Description of alternative procedures:** CT is requesting to temporarily waive the rule that students are ineligible unless they meet an exemption listed in 7 CFR 273.5(b). All students of higher education who are enrolled at least half-time will be temporarily eligible for SNAP benefits through August 2020. They will not have to meet an exemption to become an eligible student. Ineligible student status will be waived when determining eligibility for SNAP benefits.
- 7. Justification for request: As a result of the COVID-19 outbreak, many institutions of higher education are requesting students stay home and engage with their college education/equivalent remotely. For example, as of 3/11/2020, the University of Connecticut has requested that all students who are able to move back home and engage in learning remotely do so. This will result in many students moving back in with their families who may be eligible for or currently receiving SNAP benefits, or into households that are not accustomed to financially supporting the student's food consumption. As a result, these students or their families may be in need of SNAP benefits or an increase in the amount of SNAP benefits they currently receive. At the same time, many jobs are opting to work from home or laving off employees, including in the service industry where many students are employed. As a result, additional eligible students may lose their eligible exemption status because of COVID-19 state or federal mandates. Waiving the ineligibility of student status will ensure that students are eligible for SNAP benefits during a time when they are losing an alternative food source, such as dining services at their educational institution, or losing their exemption status due to temporary lay-offs in the workforce. Many students are already food-insecure¹ and lacking access to dining services or a disruption in their normal school schedules may affect their ability to access food. As COVID-19 has been cited to possibly last until July or August, CT would like to ensure that students have food access for the remainder of the semester and through the summer.

¹ http://www.ejournalofpublicaffairs.org/college-student-food-insecurity/

- 8. Anticipated impact on households and State Agency operations: Additional households may become eligible for higher benefit amounts that currently contain ineligible students in the household. New households are also expected to apply for SNAP benefits while they transition home to engage in higher education remotely. CT has already prioritized new applications during the COVID-19 outbreak. CT expects, and is preparing for, an increase in applications during this time.
 - 9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver: It is difficult to capture the number of newly eligible students because CT does not have comprehensive data on who would be eligible if the regulation were to be waived. However, nearly 114,390 CT residents were enrolled in a CT higher education institution in School Year 2018-2019².
- 10. Time Period for which Waiver is needed: Implementation through August 31, 2020.
- 11. Proposed Quality Control Review Procedures: QC will be held harmless when reviewing households that include an otherwise ineligible student member during the waiver period.
- 12. Signature and Title of Requesting Official:

Deidre Gifford, MD, MPH

Commissioner, Connecticut Department of Social Services

13. Date of Request: March 18, 2020

² http://www.ctohe.org/News/pdfs/2019/2018SystemTrends.pdf