



Food and  
Nutrition  
Service

1320 Braddock Place  
Alexandria, VA  
22314

DATE: February 15, 2023

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Preparing for Changes in Student Eligibility Following the End of the COVID-19 Public Health Emergency (PHE)

TO: All SNAP State Agencies  
All Regions

The Food and Nutrition Service (FNS) appreciates State agencies' efforts in connecting eligible students to the Supplemental Nutrition Assistance Program (SNAP) during the COVID-19 pandemic. The rules concerning student eligibility for SNAP are changing due to the lifting of the COVID-19 Federal public health emergency (PHE) on May 11, 2023. To help State agencies prepare for these changes, FNS has consolidated and is sharing existing resources related to student eligibility. We hope that having this information in one place will be helpful to State agencies as they implement policies and processes to ensure eligible students retain access to SNAP.

### **End of Temporary Student Exemptions**

The temporary student exemptions authorized under the Consolidated Appropriations Act, 2021 (CAA, 2021) will begin phasing out once the PHE is lifted. Therefore, FNS is re-releasing the [memorandum](#) titled "End of Temporary Student Exemptions in the Consolidated Appropriations Act, 2021" initially issued on October 12, 2022.

As a reminder, the CAA, 2021 temporarily expanded SNAP eligibility to students who either:

1. Were eligible to participate in a State or Federally financed work study program during the regular school year, as determined by the institution of higher education; or,
2. Had an expected family contribution (EFC) of 0 in the current academic year.

State agencies should refer to the memorandum entitled [SNAP – Expiration of Program Flexibilities for the COVID-19 Public Health Emergency](#) for details on the timeline for ending the temporary student exemptions for initial applications and recertifications. Additionally, FNS has provided an optional [example notice template](#) for State agencies to use in notifying households of these changes ahead of the end of the PHE.

### **Screening for Eligibility**

State agencies should ensure that they have policies and processes in place to correctly identify which individuals are subject to SNAP student eligibility restrictions, and which individuals meet an exemption outlined in 7 CFR 273.5. Students who were previously certified under the temporary exemptions may continue to be eligible under a different exemption.

To support State agencies in determining which individuals are subject to the standard student eligibility requirements, FNS released a memorandum, “[Supplemental Nutrition Assistance Program - Institutions of Higher Education and Student Eligibility Rules](#)” on February 7, 2023. This memo clarifies two elements of longstanding policy: which individuals are considered enrolled in an IHE and, therefore, subject to the student eligibility rules at 7 CFR 273.5(a), and which students are exempt from the SNAP work requirements at 7 CFR 273.7(b)(1)(viii).

Additionally, the June 2, 2022, memorandum, “[Clarification on Treatment of Meal Plans at Institutions of Higher Education](#),” provides information for State agencies about determining eligibility for students receiving meal plans at IHEs.

### **Outreach to Eligible Students**

FNS encourages State agencies to conduct outreach about the upcoming changes to student exemptions with stakeholders, including IHE’s, State departments of higher education, advocates, and students.

FNS has identified students as a [priority area](#) for fiscal year 2024 State outreach plans. FNS encourages State agencies to partner with IHEs to support student enrollment in SNAP on an ongoing basis and to use data from the Federal Application for Student Aid (FAFSA®) to communicate (e.g., text, email) with potentially eligible students. For additional information on the appropriate use of FAFSA data, States can refer to the U.S. Department of Education’s [Dear Colleague Letter](#) released on January 20, 2022.

Thoughtful communication, proper screening, and outreach will be necessary to ensure eligible students have access to SNAP as the temporary student exemptions come to an end. FNS stands ready to support State agencies and provide technical assistance as necessary.

All SNAP State Agencies/Region  
Page 3

State agencies with questions should contact their respective Regional Office representatives.

Moira Johnston  
Acting Director  
Program Development Division