

WAIVER REQUEST

Student Eligibility

1. **Type of Request:** Initial
2. **Primary Citation:** Section 6(e) of the Food and Nutrition Act of 2008, as amended
3. **Secondary Regulation Citation:** 7 CFR 273.5 (b)(5)
4. **State:** Rhode Island
5. **FNS Region:** NERO
6. **Act and Regulatory Requirements:** Section 6(e) of the Food and Nutrition Act of 2008 and Federal regulation defines household members at least half-half time in an institution of higher education are not eligible for Supplemental Nutrition Assistance Program (SNAP) unless they meet certain student exemptions.

7 CFR 273.5(b)(5) identifies the students enrolled in an institution of higher education may be eligible for SNAP if they meet the exemption of being employed a minimum of 20 hours per week.
7. **Proposed Alternative Procedures:** Rhode Island is requesting a waiver to allow students of higher education who are impacted due to COVID-19 to qualify for SNAP regardless of employment status. The SA will re-evaluate for student eligibility at the next periodic report or eligibility review, after the pandemic has ceased.
8. **Justification for Request:** Due to the COVID-19 pandemic, an emergency proclamation mandates closure of restaurants, bars, and entertainment and recreational facilities across the state of Rhode Island. Additionally, CDC recommendations to limit gatherings to ten people. Due to the evolving situation, the SA recognizes the need to do more to provide assistance to those impacted by COVID-19 related closures.

Students who are eligible for SNAP are impacted by the closing of businesses and are unable to work the required 20 hours a week of employment mandated in the regulation. The SA is requesting to waive the requirement that students work and average of 20 hours a week to obtain or maintain SNAP eligibility.
9. **Anticipated Impact on Households:** Maintaining SNAP benefits for eligible students during this crisis is crucial. The SA will ensure students remain eligible or are able to access benefits during this time when they report a change in employment due to widespread business closures or become eligible when families report a change in household composition due to students returning home due to the closure of their college campuses. The SA does not anticipate a large increase in the number of eligible households, but rather maintaining eligibility for current recipients.
10. **Affected Caseload:** The caseload of existing eligible students working an average of 20 hours a week, who are temporarily out of work because of COVID-19, will remain the same.

The number of eligible students could increase, because of waiving the work requirement, however these students are not currently eligible, and therefore this amount is unknown.

11. Anticipated Implementation Date: The SA anticipates implementation of the waiver immediately upon approval.

12. Proposed Quality Control Procedures: The proposal does not affect quality control sampling or procedures.

13. Signature and Title of Requesting Official:



Bethany Caputo
SNAP Administrator, RI Department of Human Services

14. Date of Request: March 30, 2020