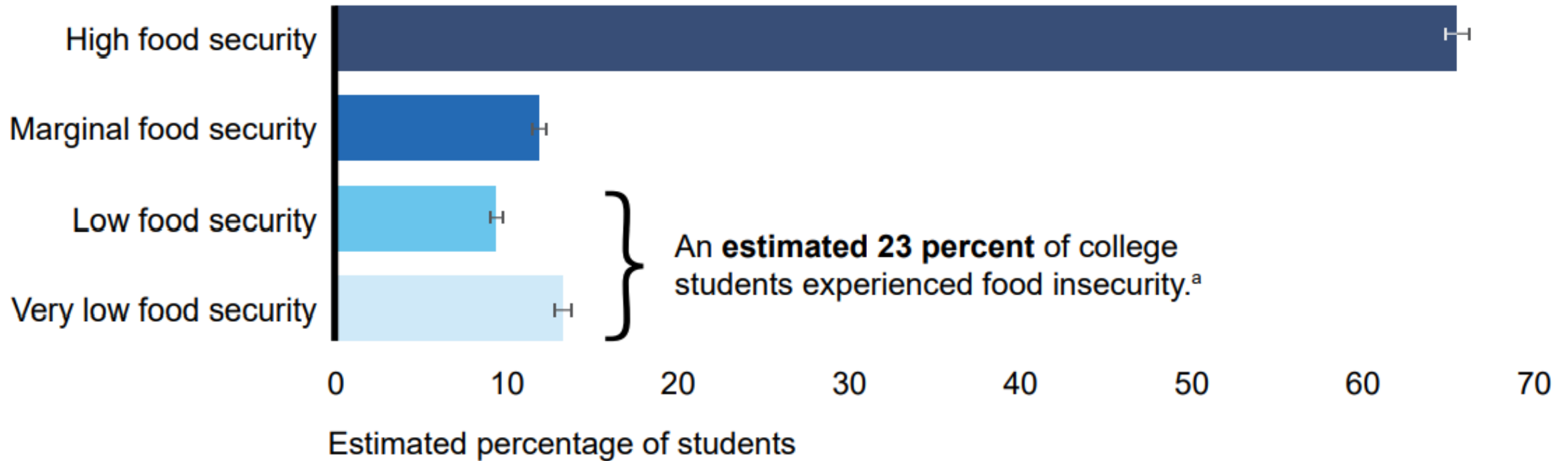


Demystifying SNAP Student Eligibility

2024 SNAP E&T National Forum | Wednesday, October 30, 2024



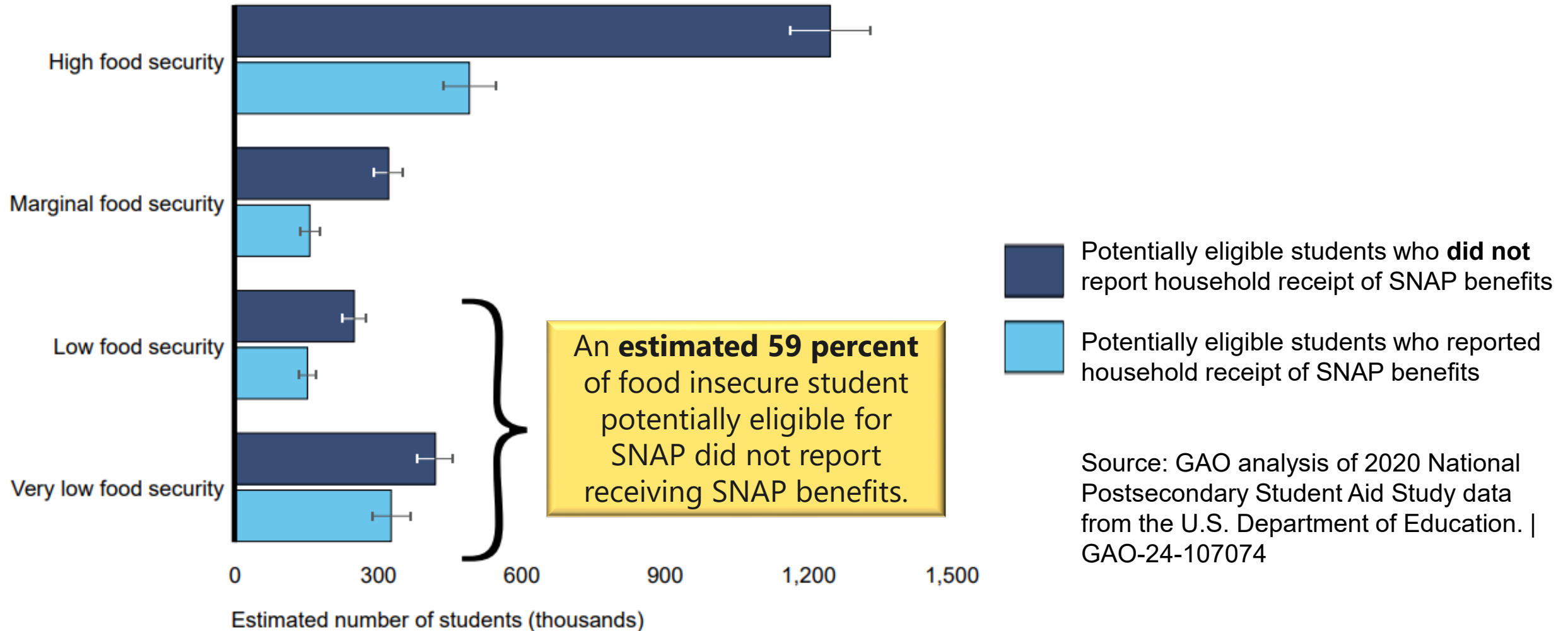
Estimated Food Security Status among College Students, 2020



— Error bars display 95 percent confidence interval for estimates

Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Estimated Supplemental Nutrition Assistance Program (SNAP) Receipt among Potentially Eligible College Students, 2020



Purpose

- Implement accurate screening and policy for student SNAP eligibility in your State.

Objectives

- Understand who is considered a student enrolled in an “institution of higher education,” for SNAP purposes
- Be familiar with the resources (memo and flow chart) available on this policy area
- Understand screening best practices

Myths vs. Facts

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- **Myth:** Federal definitions of IHEs align.

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- **Fact:** Only those enrolled half-time or more in specific schools are "students."
- **Myth:** Federal definitions of IHEs align.
- **Fact:** Institution of higher education means different things in SNAP vs. financial aid.

Who is a student?

Whether an individual is considered to be enrolled in an institution of higher education for SNAP eligibility purposes is defined in regulation by three criteria:

Enrollment
status

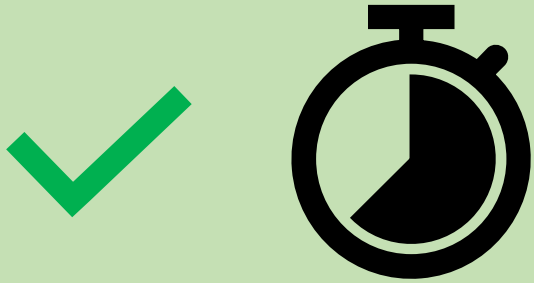
Type of
school

Type of
curriculum

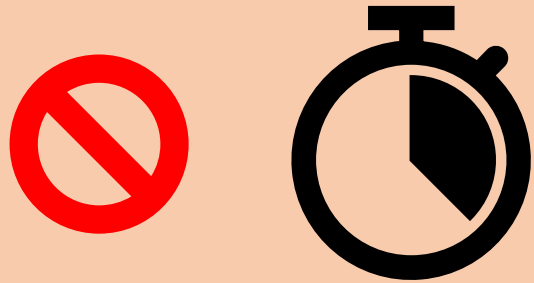
Enrollment status

- Individuals enrolled in an institution of higher education **at least half-time**
- The institution of higher education determines what is considered half-time enrollment.

Who is a student?



Student: Individuals enrolled in an institution of higher education **at least half-time**



Not a student: Individuals enrolled **less than half-time**

The institution of higher education determines what is considered half-time enrollment.

What is an “institution of higher education (IHE)”?



A **business, technical, trade, or vocational school**, in a curriculum that normally requires a high school diploma or equivalent (GED) for enrollment in the curriculum



A regular curriculum at a **college or university that offers degrees**, regardless of whether a high school diploma is required

Business, technical, trade, or vocational school

Example 1:

Angela is enrolled half time in a beauty school that requires either a high school diploma or equivalency exam for enrollment.

Business, technical, trade, or vocational school

Example 1:

Angela is enrolled half time in a beauty school that requires either a high school diploma or equivalency exam for enrollment.

Angela **is** an individual enrolled at an institution of higher education, and therefore a student for the purposes of SNAP.

Business, technical, trade, or vocational school

Example 2:

Brian is enrolled half time in a technical school. The school requires a high school diploma or GED for their degree programs.

Brian is enrolled in a one-year certificate program that does not require a HS diploma or GED.

Business, technical, trade, or vocational school

Example 2:

Brian is enrolled half time in a technical school. The school requires a high school diploma or GED for their degree programs.

Brian is enrolled in a one-year certificate program that does not require a HS diploma or GED.

Brian is not a student at an institution of higher education for SNAP.

College or university offering degree programs

- Junior colleges, community colleges, colleges or universities
- Regular curriculum
 - Varies from school to school
 - Generally includes degree programs (associate's, bachelor's, graduate degrees)



Programs outside the “regular curriculum”

- Remedial education
- Continuing or community education
- Professional development
- English for speakers of other languages
- Workforce development/training programs
- Occupational training
- Short-term certificate programs



Examples of Programs outside the “regular curriculum”

- Reimagine Arkansas Workforce Project at the University of Arkansas offers professional and workforce development
- Northern Virginia Community College offers continuing education and workforce development programs
- Bunker Hill Community College in Massachusetts offers a wide array of community and workforce development opportunities

College or university offering degree programs

Example 3:

Catrina enrolled half-time in an ESL certificate program at Northern Virginia Community College. Certificate program does not require high school diploma or equivalent.

College or university offering degree programs

Example 3:

Catrina enrolled half-time in an ESL certificate program at Northern Virginia Community College. Certificate program does not require high school diploma or equivalent.

Because she's not enrolled in the college's regular curriculum, **Catrina is not** a student at an institution of higher education for the purposes of SNAP.

The lack of a high school diploma requirement is irrelevant.

College or university offering degree programs

Example 4:

Derek enrolled full-time in a bachelor's program at Harvard University.

College or university offering degree programs

Example 4:

Derek enrolled full-time in a bachelor's program at Harvard University.

Derek **is** a student enrolled in an institution of higher education for the purposes of SNAP, because he is enrolled in Harvard's regular curriculum.

The takeaway

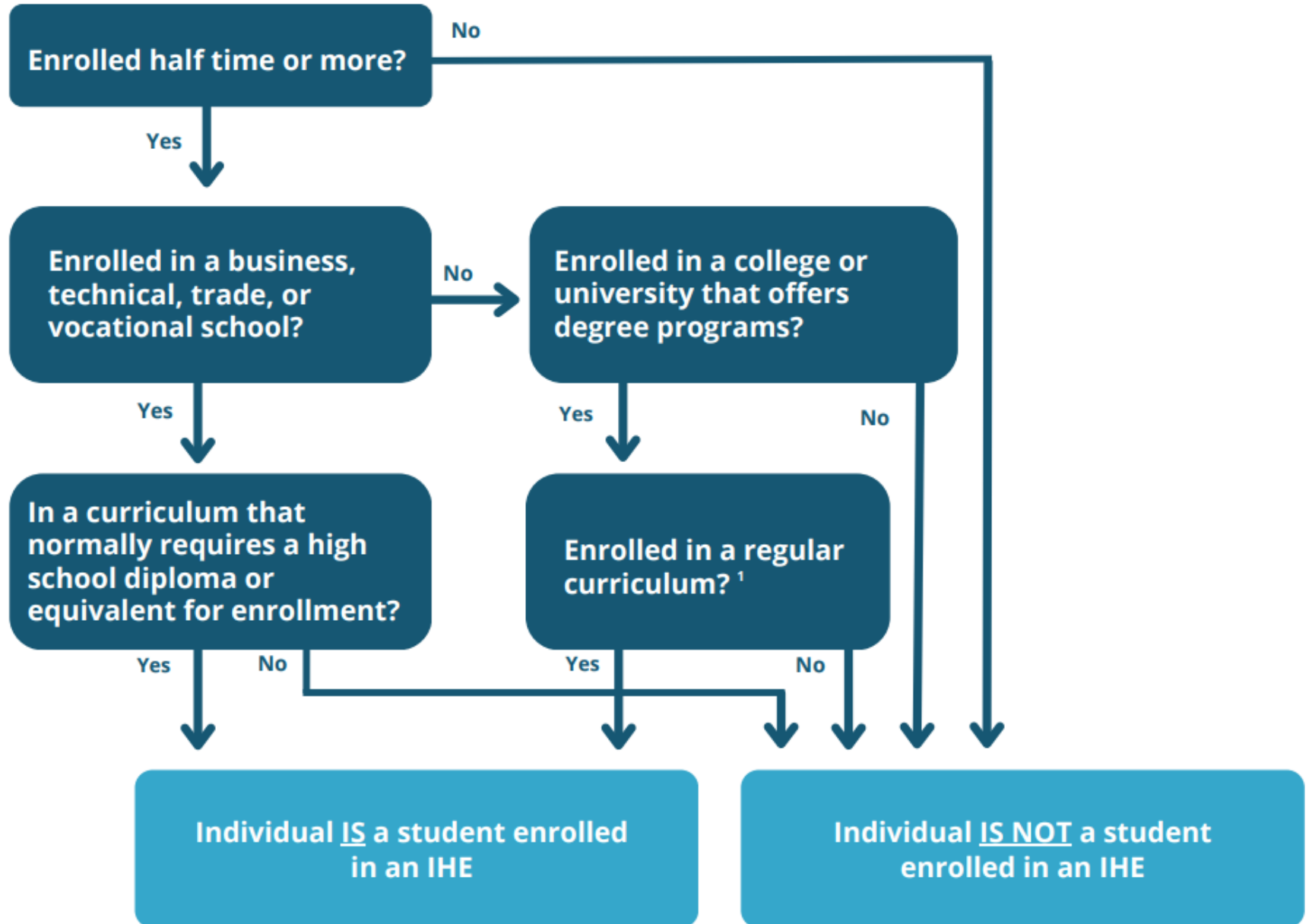
Not all students at the **same school** will be considered “enrolled in an institution of higher education” for SNAP.



Not enrolled in an IHE



Enrolled in an IHE



Eligible vs. ineligible students

If a student is enrolled in an institution of higher education at least half-time, they are **only** eligible for SNAP if they meet an exemption.

Exemptions include:

Working 20+
hours a
week

Being under
age 18 or
over age 49

Care for
dependent
child under
age of 6

Many more!

Student eligibility & work requirements

Students enrolled **at least** half-time in any recognized school, training program, **or IHE**



Exempt from work requirements, including ABAWD time limit & mandatory E&T



Must meet SNAP student exemption*

*Only for students enrolled in an IHE

Students enrolled **less than** half-time in any recognized school, training program, **or IHE**



Must comply with work requirements, ABAWD time limit, and mandatory E&T, unless they meet another exemption



Do not have to meet SNAP student exemption

Example 5:

Eduardo is 18 years old, taking one general education credit per semester at a community college that offers associate's degrees. The college considers half-time to be two classes/semester.

- Is Eduardo enrolled in an institution of higher education?
- Does he have to meet a student exemption?
- Does he have to comply with work requirements?

Example 5:

Eduardo is 18 years old, taking one general education credit per semester at a community college that offers associate's degrees. The college considers half-time to be two classes/semester.

- Is Eduardo enrolled in an institution of higher education?

N/A: enrolled less than half time

- Does he have to meet a student exemption?

No: enrolled less than half time

- Does he have to comply with work requirements?

Yes, unless he meets another work requirement exemption. The student exemption to the work requirements only applies to students enrolled half-time or more.

Example 6:

Frank is 58 years old, enrolled half-time in a re-skilling workforce development program at a community college that offers associates degrees.

- Is Frank enrolled in an institution of higher education?
- Does he have to meet a student exemption?
- Does he have to comply with work requirements?

Example 6:

Frank is 58 years old, enrolled half-time in a re-skilling workforce development program at a community college that offers associates degrees.

- Is Frank enrolled in an institution of higher education?

No: enrolled outside the regular curriculum

- Does he have to meet a student exemption?

No: not enrolled in an IHE

- Does he have to comply with work requirements?

Maybe: he is enrolled at least half-time, but not in an IHE.

Screening

States must screen individuals for:

Student
classification
& exemptions

Work
requirement
exemptions

Referral for
E&T (both
voluntary &
mandatory)

General work
requirement,
incl. mandatory
E&T

ABAWD time
limit

Screening in Practice

Make use of the information that you are already collecting for other eligibility purposes to screen.

The **application, periodic report, and recertification** are good sources for:

- Household composition (incl. children in the household)
- Age
- Disability
- Employment status and income
- Enrollment in school

Ask effective questions and follow up

Screen using clear, probing questions and follow up as needed:

Don't just ask: Are you a student?

Do ask:

- If you are a student, are you enrolled:
 - Full time
 - At least half-time
 - Less than half-time
 - Not sure

Screening in the interview

The interview is a critical opportunity to ask about:

Enrollment
status



Program
type



Exemptions



Screening Tips

- Conduct regular training
- Provide a script to discuss student eligibility during the interview
- Develop a checklist of exemptions and screening tips
- Partner with higher education organization to develop lists of IHEs and tools workers can reference quickly

Resources

Memo

Feb. 7, 2023, Supplemental Nutrition Assistance Program - Institutions of Higher Education and Student Eligibility Rules

www.fns.usda.gov/snap/ihe-student-eligibility-rules

Flowchart

How to determine whether an individual is enrolled in an institution of higher education (IHE) for SNAP eligibility purposes

www.fns.usda.gov/snap/ihe-student-eligibility-rules

SNAP Students webpage

www.fns.usda.gov/snap/students

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QR: <https://www.surveymonkey.com/r/F6HFLHH>