



SNAP for College Students

An Overview

What is SNAP?

- **Supplemental Nutrition Assistance Program**
- Formerly known as Food Stamps
- Paid through Electronic Benefit Transfer (EBT) cards that can be used to buy food



How much is SNAP worth?

- The maximum monthly amounts:
 - For a household of 1 is \$192/month
 - For a household of 3 is \$504/month
- Most recipients receive less, because they have some earnings or other income.
 - The benefit calculation takes into account earnings and sometimes particular assets (many states no longer count assets at all), as well as expenses such as housing and child care costs.

Where can SNAP be used?

- SNAP can be used to buy groceries at over 246,000 authorized retailers – grocery stores, but also other places that sell food, including discount stores, bodegas and farmers markets.
- SNAP generally cannot be used to buy prepared foods, such as fast food or takeout pizza.*
- SNAP cannot be used to pay for college cafeteria meal plans.
 - Students who live in dorms and receive more than half their meals from a meal plan are not eligible for benefits.

*If a state has a Restaurant Meal Program (RMP), then students who are elderly, disabled or homeless can purchase prepared food at approved locations.

Are College Students Eligible for SNAP?

- **It depends...**
- SNAP eligibility is based on monthly income, so Congress was concerned that college students from middle class families could qualify even though they don't need help.
- Therefore, most college students (attending at least half time) are excluded from receiving SNAP, but there are a set of exceptions that apply to many non-traditional and low-income students. These are explained on the following slides.
- Students who qualify for the exceptions are subject to the regular income and asset limits for SNAP eligibility.

Reasons a student might be eligible

- Age or disability status;
- Parent or caregiver;
- Employed at least 20 hours per week or receiving any work-study funds;
- Receiving TANF benefits; or
- Enrolled in certain programs aimed at employment.

Exception: Student status

- Student restrictions do not apply to individuals attending college less than half-time, as defined by the school.
- Restrictions do not apply to individuals who are in programs that do not require a HS diploma and is not a “regular” program of a college or university, even if most other students have one.
 - Example: Yolanda has a GED, but is enrolled in a campus based vocational certificate program that does not require a HS degree. If she meets the income and asset requirements, she is eligible for SNAP benefits and is not considered a “college student.”

Non-Students May Be Subject to Other Requirements



- Some childless individuals who are not “college students” and are not working 20 hours a week may be subject to a 3-month time limit in some areas.
 - Less than half-time students
 - Students in adult education programs (that are not counted as SNAP E&T components)
- Many states have waivers for the time limit due to high unemployment

Exemption: Age or disability status

- Individuals who are 50 years or older or are under 18 years old are exempt from the student exclusion (and are not subject to the 3-month time limit).
- Individuals who are unable to work because of disability are exempt from the student exclusion (and the 3-month time limit).
 - Does not require total and permanent disability at the level of SSI or SSDI eligibility, but may require a medical note.

Exemption: Parent or caregiver

- The following parents/caregivers are exempt from the student exclusion:
 - Parent caring for and living with child under 6.
 - Not limited to single parents
 - Single parent enrolled full-time (as defined by the school) with a child under 12 years old.
 - Parent responsible for child between 6 and 11 years old and cannot obtain adequate child care.
 - Parent exemptions are not limited to birth parents – grandparents and other caregivers may qualify as well.



Exemption: “adequate child care”

- If a student lacks access to adequate child care to attend classes AND work 20 hours per week, the student is exempt from the student exclusion.
 - Even if the student isn't currently employed.
- Applies if child care is not available during the hours needed for classes.
- Even applies if only child care available is substandard, or not appropriate for the child.

Exemption: Employed

- Students are exempt from the student exclusion if employed for pay at least 20 hours per week.
 - Many states have received a waiver allowing them to average hours of employment over month.
 - Schools may need to provide documentation of hours of work to students employed as course assistants even if they are not paid on hourly basis.
- Students are exempt if participating in federal or state work-study program – even if they work fewer than 20 hours per week.

Exemption: Receiving TANF

- Students receiving monthly cash assistance payments from TANF are exempt from the student exclusion rules.
- May also apply to students who receive other TANF-funded benefits, such as child care, diversion payments, etc.
- May also apply to students who attended school while receiving such benefits in the past.

Exemption: Enrolled in programs to increase employability

- Exemption also applies to students who are “assigned to or placed in an institution of higher education through or in compliance with the requirements of:”
 - SNAP Employment and Training if the program meets standards for promoting job-readiness;
 - Workforce Investment Act programs;
 - Trade Adjustment Assistance; or
 - “Another program for the purpose of employment and training operated by a State or local government.”
- Self-initiated placements can count if recognized by one of these types of programs.

Exemption: “Another program”

- **SNAP agency has power to decide what to count**
- Many programs in community colleges could reasonably count as a state or local program for the purpose of employment and training.
- Massachusetts uses the Carl A. Perkins Career and Technical Education Act funding as an indicator, so SNAP offices are not required to individually assess programs.
- Career pathways and programs approved as training under Unemployment Insurance could also count.

2014 Farm Bill provisions

- Added restrictions to what kinds of education can be claimed as SNAP E&T components;
- Education that is part of a program of career and technical education that may be completed in not more than 4 years at an institution of higher education; or
- Is limited to remedial courses, basic adult education, literacy, or English as a second language.

What are the SNAP income limits?

- Under standard rules, *gross monthly income* — that is, income before any of the program's deductions are applied — generally must be *at or below 130 percent of the poverty line*.
 - For a family of three, the poverty line in federal fiscal year 2017 is \$1,702 a month. Thus, 130 percent of the poverty line for a three-person family is \$2,213 a month.
 - However, states can raise the gross income limit above this level using “categorical eligibility”.
- *Net income*, or income after deductions are applied, must be *at or below the poverty line* unless the household has a member over age 60 or getting major disability benefits like Social Security or SSI.

See: http://www.fns.usda.gov/snap/applicant_recipients/eligibility.htm

Does financial aid count as income?

- Federal financial aid (Title IV of HEA or Bureau of Indian Affairs aid) never counts as income or assets for SNAP benefits. This includes Pell grants, Perkins loans and Stafford loans.
- Work-study earnings do not count as income.
- Non-federal financial aid used for anything other than living expenses is not counted.
- Other financial aid, including deferred payment loans and veterans' educational benefits, are not counted as long as it is used to pay for educational expenses, including tuition, books, and required fees.

What deductions are taken from income?

- A *standard deduction* based on family size to account for basic unavoidable costs;
- An *earnings deduction* equal to 20 percent of earnings;
- A *dependent care deduction* for out-of-pocket child care or other dependent care expenses that are necessary for a member to work or participate in education or training;
- A *child support deduction* for any legally obligated child support a member of the household pays;
- A *medical expense deduction* (only available to households with an elderly or disabled member with expenses above \$35 a month if not paid by insurance or someone else); and
- An *excess shelter deduction*, the amount by which the household's housing costs (including utilities) exceed half of its net income after all other deductions (capped at \$459 a month unless a member is elderly or disabled).

What about asset limits?

- Under federal rules, households *without* an elderly or disabled member must have assets of \$2,000 or less, and households *with* an elderly or disabled member must have assets of \$3,250 or less.
- However, *states have flexibility to raise or eliminate these limits* using “categorical eligibility” and many have done so.
- The value of vehicles over \$4,650 may be counted toward an asset limit however, many states have used the option to raise or eliminate this limit. Most states exclude the value of one vehicle per household or all household vehicles all together.

Whose income and assets are counted?

- A SNAP household is a group of people who live together and buy and prepare meals together.
- If roommates buy and prepare at least half their meals together, they count as a SNAP household and must apply together
- Special rules apply when one or more members of a household are ineligible, such as because of their immigration status, or because they are students and do not meet one of the student exemptions.

What happens when an ineligible student lives with others?

- If an ineligible student (e.g. a college student who does not meet one of the exemptions discussed earlier) is in a household with other individuals, the other members can still receive SNAP benefits and the student's income and resources are not counted.
 - If the student has significant income or resources, the household may get more SNAP benefits if the student is excluded from the household.



Do students need to report their parents' income?

- Income and assets of parents who do not live with the student are not counted.
- But if parents or others provide students with ongoing support, that support may need to be reported as income unless it is clearly a loan.
- If students live with their parents, and are at least 22 years old, and buy and prepare at least half of their meals independently, they can apply as a separate household.
- Young adults ages 18-21 who live with their parents can only apply as part of their parents' household.

Special rules for non-citizens

- Undocumented non-citizens and non-citizens with temporary status, including those who entered with student visas, are not eligible for SNAP benefits.
- Students granted Deferred Action for Childhood Arrivals (DACA) are also not eligible for SNAP.
- Non-citizen children under 18 who are “qualified immigrants,” are eligible without a waiting period.
- Non-citizen adults who are “qualified immigrants,” such as Lawful Permanent Residents (LPRs), typically are subject to a 5 years waiting period.
- Rules for non-citizens are complicated and this slide does not capture all the details.

Mixed-status immigrant families

- If some members of a household are eligible for SNAP and others are not because of their immigration status, the eligible members can still receive SNAP benefits.
- Ineligible individuals can apply for benefits on behalf of eligible family members. They do not need to provide a social security number, but do have to report on their income and assets.
- States have options on how to treat the income and resources of a non-applicant household member in determining eligibility and benefits.

Does receiving SNAP affect financial aid?

- SNAP benefits are not treated as income when calculating expected family contribution (EFC) for financial aid.
- When students complete the FAFSA and report that they are receiving SNAP or other benefits, they are eligible for a simplified needs analysis that does not require them to report family assets.
- If students receive SNAP and have family income under \$24,000, they qualify for an automatic zero EFC and more financial aid.