

# SNAP REIMAGINED:

## Improving Postsecondary Education Access and Completion

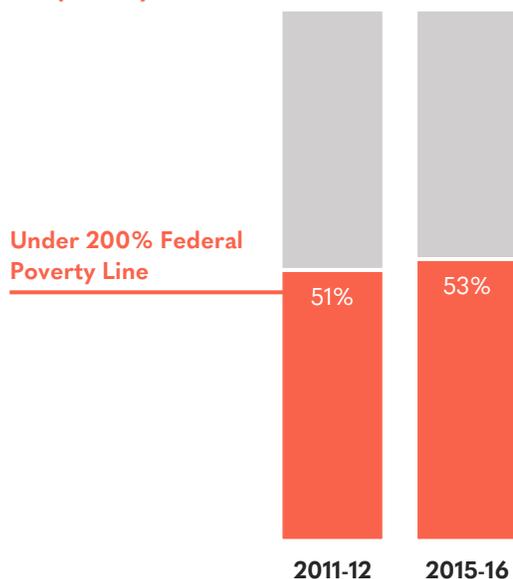
### Executive Summary

Higher education remains a reliable force for economic growth and security. However, only about 60 percent of all students who enroll in college graduate within six years, with significant disparities in outcomes for students of color.<sup>1</sup> In addition to the well-documented need for more robust financial aid and comprehensive advising, the role of student basic needs insecurity in college success has garnered increasing attention.<sup>2</sup> Research shows that student basic needs insecurity is correlated with less successful postsecondary outcomes, increased anxiety, depression, and poorer health.<sup>3</sup>

Postsecondary credentials will continue to be vital to our economy. The U.S. Bureau of Labor and Statistics (BLS) predicts that entry-level jobs that require more education will grow faster than average.<sup>4</sup> In response, people with lower incomes now enroll in college at rates higher than their middle-income peers.

Over 50 percent<sup>5</sup> of undergraduate students who enrolled in academic years 2011-2012 and 2015-2016 had incomes below 200 percent of the poverty line. Students with low incomes face high levels of unmet need, increasing their basic needs insecurity and harming college completion.

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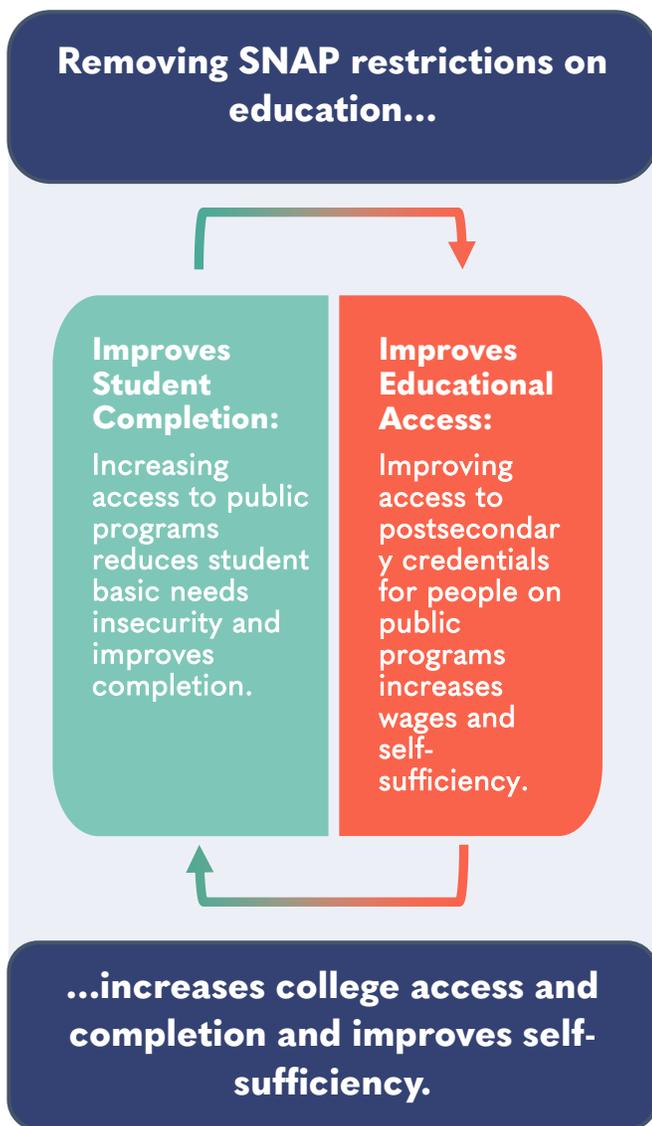
Need-based financial aid, including grants and government loans, is designed to close the gap between colleges costs and students' ability to pay. However, grant aid has not kept pace with rising college costs: the current maximum Pell Grant covers the lowest share of college costs in the program's history.<sup>6</sup> Similarly, it was not designed to address the extent to which today's students face unpredictable earnings, expenses, and sustained high levels of unmet basic needs, like food and housing.<sup>7</sup>

These converging challenges prompted promising federal, state and college efforts to improve students' access to the Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps)<sup>8</sup> due to its effectiveness in reducing food insecurity in the general population.<sup>9</sup> However, despite extensive efforts, it is estimated that less than four out of 10 potentially eligible students participate in the program due largely to duplicative, overly complex, and confusing student eligibility rules.<sup>10</sup>

Fortunately, policymakers can remove these barriers to education and employment. While expanding the student exemptions in SNAP might improve access, it will not address the poor understanding and complex administration of the current student rules. Additionally, relying on the federal calculation of financial need and the FAFSA process has significant downsides for identifying SNAP eligibility.

**To better connect SNAP participants to education and better connect postsecondary students to SNAP we recommend that Congress ensure postsecondary activities meet work requirements and time limit exemptions. Specifically:**

- ➔ include credentials, certificates, and degrees at institutions of higher education postsecondary under definitions of “Employment and Training Programs”; and
- ➔ eliminate or significantly simplify student restrictions on eligibility.



**Reforming SNAP to improve educational outcomes....**

- ✔ Simplifies eligibility determinations that can reduce the cost of administering SNAP.
- ✔ Improves the long-term economic security of SNAP recipients.
- ✔ Maximizes federal and state investments in higher education.
- ✔ Supports state college completion goals.
- ✔ Leads to better employment outcomes.
- ✔ Reduces reliance on SNAP.

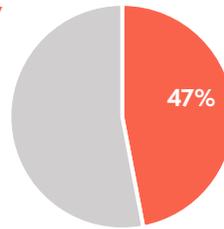
**Reforming SNAP to improve education outcomes DOES NOT....**

- ✘ Increase the number of people eligible for SNAP.
- ✘ Increase the risk of fraud, waste, or abuse.
- ✘ Create dependency on SNAP.
- ✘ Increase SNAP costs.

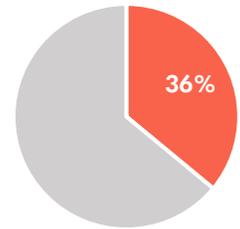
## Introduction

A literature review of student food insecurity shows that 47 percent of community college students and 36 percent of students at four-year institutions experience food insecurity.<sup>11</sup>

**47% of community college students experience food insecurity.**



**36% of four-year college students experience food insecurity.**



Addressing student food insecurity, which is prevalent among students with low incomes,<sup>12</sup> has rightly become a national priority. At every level of government, across human services agencies and higher education, policymakers and institutions are working to reduce student basic needs insecurity and support student success. Recent efforts include federal<sup>13</sup> legislation and grants,<sup>14</sup> initiatives at higher education institutions,<sup>15</sup> action in states<sup>16</sup> as well as increased attention from the White House.<sup>17</sup> These efforts are increasingly warranted as growth in entry-level jobs that require more education<sup>18</sup> converge with ongoing college enrollment struggles to recover to pre-pandemic levels.<sup>19</sup>

SNAP<sup>20</sup> has garnered increased attention as a strategy to reduce student food insecurity and improve college completion. In response to the pandemic, Congress attempted to improve student access to SNAP with new provisions that went into effect in January 2021.<sup>21</sup> One estimate proposed that this change made three million college students newly eligible.<sup>22</sup> However, a recent report shows that students had even higher levels of food insecurity in December 2022 than when previously surveyed in December 2020.<sup>23</sup> The changes may have had less effect than expected, in part, because the rules that provide access for students are overly complex and duplicative of SNAP's already stringent eligibility and verification measures.

**In this brief, we explore current pathways available for students to access SNAP benefits and weigh options for improving student access to SNAP. We consider the strengths and weaknesses of tying SNAP access for students through FAFSA elements and identify policy changes that would eliminate the existing student exemptions.**

## The Supplemental Nutrition Assistance Program (SNAP)

The Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps)<sup>24</sup> is the nation's largest food assistance program. SNAP provides a modest assurance that people with low incomes or those experiencing temporary financial hardship can afford their most basic need: food. The SNAP program is highly effective as an economic stabilizer during economic downturns and includes an economic multiplier effect.<sup>25</sup> It is estimated that each dollar of SNAP spent in a community can generate up to \$1.50 of economic activity.<sup>26</sup>

Eligibility for SNAP<sup>27</sup> is assessed through income, citizenship status, and household composition criteria. SNAP sets monthly gross and net income limits, based on household size. Households with an elderly or disabled member are subject to a different set of eligibility rules. The federal income limit for SNAP eligibility is set at 130 percent of the Federal Poverty Level (FPL). States can choose to raise that limit and some have raised it to 200 percent of FPL which also streamlines eligibility determinations for multiple programs.<sup>28</sup> When a household's income exceeds the FPL for their family size, they are no longer eligible for SNAP.

**2023 Poverty Guidelines: 48 Contiguous States Annual Income**  
(Excludes AK & HI)

Household Size	FPL 130%	FPL 200%*
1	\$18,954	\$29,160
2	\$25,636	\$39,440
3	\$32,318	\$49,720
4	\$39,000	\$60,000

\*Thirty-four states have raised the gross income limit above 130% FPL

## SNAP Student Rules Are Redundant & Extraneous

Despite already having to meet SNAP's rigorous standard eligibility requirements, postsecondary students are subjected to a duplicate layer of proving their "need". To receive SNAP, postsecondary students must meet all standard eligibility criteria, be enrolled at least half-time, and then meet *at least one* of the student exemptions.<sup>29</sup> Students attending school less than half-time are still eligible for SNAP but could be subjected to at least one or both of SNAP's work requirements.<sup>30</sup>

**The student exemptions are found in the Food and Nutrition Act (FNA or Farm Bill) under Section 6: "Eligibility Disqualifications". This term is a source of confusion since the exemptions determine which criteria "exempt" students from disqualification.<sup>31</sup>**

The SNAP student eligibility rules were enacted in the 1970s in response to concerns that middle- and upper-income students were improperly receiving assistance. However, the process for certifying SNAP eligibility has evolved in ways that make those concerns virtually obsolete. Application information is collected online for many people and state SNAP agencies, with federal oversight, evaluate applications to determine eligibility and the size of benefit allotment using data matching from multiple sources.<sup>32</sup>

Six statutorily mandated data matches are required as part of the SNAP certification process. Five federal databases verify items such as employment information, immigration status, and more. The last database is an Income & Eligibility Verification System (IEVS) that pulls from a combination of federal, state, and local data sources to confirm the accuracy of information provided by an applicant. Eligibility workers also contact other entities when necessary, such as calling an applicant's landlord to verify information. Similarly, the process for capturing household information includes parameters that ensure that the income of parents and students, when applicable, are included in the SNAP application.

Many states have ramped up efforts<sup>33</sup> to improve postsecondary student access to SNAP in recognition of the value to state residents and states' economies. Despite these extensive efforts, it is estimated that less than four out of 10 potentially eligible students participate in the program. The Government Accountability Office (GAO) determined that almost 60 percent of potentially eligible students<sup>34</sup> were not receiving SNAP. Significantly, among this group, 34 percent met at least one exemption criterion yet did not receive SNAP.

A senior official at Food and Nutrition Service (FNS, the federal program that administers SNAP) reported that the student exemptions were among the most complicated SNAP policies to explain.

The complexity of the SNAP student rules leads to low participation. The GAO reported that higher education institution representatives and students did not know about or found it difficult to understand the SNAP student rules. The result is a commonly held misconception that “students aren’t eligible”. If the federal agency that administers the program struggles to communicate student eligibility, state governments will have difficulty administering benefits correctly.

## Assessment of Current Student Exemptions in SNAP

Below we assess the strengths and weaknesses of certain student exemptions, both permanent and temporary, that confer student access to SNAP. It is important to note that our analysis is significantly limited by gaps in data available on SNAP student exemption.<sup>35</sup> States are not required to report which exemptions they use to confer student eligibility, but instead, report “education and training” activities. These include high school, adult literacy, vocational education, and postsecondary credentials. Consequently, we use a mix of educational and economic data to inform how the following exemptions likely impact students.

**1.1 Student 20-Hour Per Week Work Exemption:** A person who meets income, household, and citizenship criteria and who is enrolled at least half-time in an institution of higher education may be eligible for SNAP if they are “employed a minimum of 20 hours per week”. Regulatory guidance<sup>36</sup> allows states to average weekly hours worked over a month, quarter, trimester, or semester and must indicate their choices in their state plan. Research shows that part-time students consistently work more hours than full-time students.<sup>37</sup>

**Table 1. Percentage of undergraduate students who were employed, by enrollment status and hours worked per week 2005, 2010, and 2017.**

	Full-Time Students			Part-Time Students		
	2005	2010	2017	2005	2010	2017
Less than 10 hours	7	6	7	3	3	4
10-19 hours	9	8	8	5	4	5
20-34 hours	20	16	17	22	22	25
35 hours or more	12	10	10	55	43	46
<b>Total</b>	<b>50</b>	<b>41</b>	<b>43</b>	<b>86</b>	<b>75</b>	<b>81</b>

Source: American Association of University Professors: <https://www.aaup.org/article/recognizing-reality-working-college-students#.ZAEFIHbMKUI>

There is overwhelming evidence that work requirements for public benefit programs have little effect on employment and harm participation in public programs.<sup>38</sup> Drawing from this evidence, some claim that the student work exemption is a de-facto work requirement and seek to eliminate the student work exemption. But there are distinct differences between SNAP’s work requirements and the student work exemption. The latter can be a key path for qualifying for SNAP, given the high percentage of students who are working anyway.

SNAP work requirements for non-students are assessed at the time SNAP eligibility is determined. A SNAP participant who is not already engaged in an approved activity and who does not meet an exemption must “register for work” at the time of their application. Once this occurs, SNAP eligibility is confirmed, and participants may then be required to meet activity requirements to maintain their SNAP benefits. These include working, participating in an employment and training program, or volunteering. Failure to meet activity requirements results in being “sanctioned” (or disqualified) from receiving SNAP for between a month and 36 months.<sup>39</sup>

The student work exemption operates differently. Eligibility for the 20-hour student exemption is also assessed during the SNAP application/verification process. A student who has worked 20 hours a week on average over the prior month qualifies for this exemption and receives SNAP. Once verified, a student maintains their benefits unless they have a change in circumstances by their next recertification period, which can be six or twelve months, depending on the state. A student who has not worked 20 hours a week on average over the prior month and meets no other exemption may be denied. While this is problematic, students are not barred from applying again or required to register for work as a condition of eligibility.

The research suggests working a modest amount while enrolled in school is not harmful and may indeed be helpful but there is an upper limit as hours worked per week increase beyond 15 to 20 or more.<sup>40</sup> While students from all family backgrounds often work for pay students with lower incomes and students of color are more likely to do so. Financially independent students work at higher rates and more hours than financially dependent students. Two-year institutions, for-profit and less selective four-year institutions enroll higher shares of students from low-income families who are more likely to work over 20 hours a week.<sup>41</sup> While some of those students are no doubt working too much to make ends meet, removing the student work exemption may inadvertently remove a key path to SNAP eligibility for some.<sup>42</sup>

**Key Takeaway:** Many students with low incomes are already working and most don't have a choice due to needing money to live. The complexity of determining who is eligible based on this exemption may inadvertently harm some students who only have access to SNAP through the work exemption while subjecting those enrolled less-than half time to SNAP's standard work requirements.

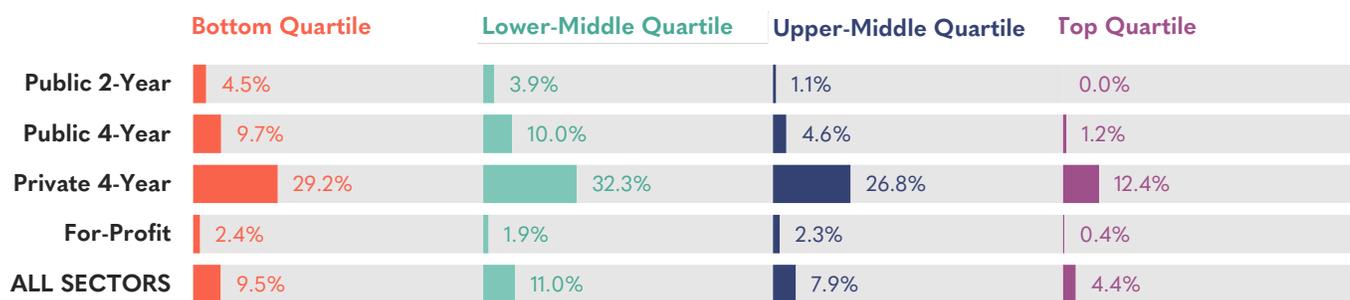
**1.2 Student Work-Study Exemption:** A person who meets income, household, and citizenship criteria and who is enrolled at least half-time in an institution of higher education may be eligible for SNAP if they participate in (or are eligible for)<sup>43</sup> a state or federally funded work-study (FWS) program. However, due to under allocation of FWS funds to community colleges and institutions serving more economically disadvantaged students, this exemption's reach is limited in its ability to provide SNAP access for the students who are most likely to qualify.

Institutions of higher education determine who is eligible for work-study. They have broad discretion to do so if the student has unmet financial need. Importantly, a student from a household with a relatively high income can still have unmet financial need simply because they enroll at a higher- cost college. Specifically, federal work-study (FWS) allocations disproportionately benefit established and higher cost, especially private, institutions.<sup>44</sup>

This is due, in part, to the federal allocation formula that distributes work-study funds based on how much the school received in the past. As a result, a student at a private four-year institution with a very high income has about a 12 percent chance of receiving FWS while the lowest income students at public four-year institutions and community colleges have a 10 and 5 percent chance, respectively.

Students from minoritized and poverty-impacted communities are the least likely to enroll in private four-year institution so are the least likely to benefit from FWS.<sup>45</sup> Public two-year colleges enroll almost half of undergraduates yet receive only 20 percent of FWS funds. Meanwhile, private four-year institutions enroll 14 percent of undergraduate students but receive 38 percent of FWS funds. Community colleges are also the least likely to have funds for FWS when they run out of their limited federal allocation.<sup>46</sup>

**Figure 1. Likelihood of Receiving Federal Work Study Funds by Income and Institution Type**



Percentage of students within each sector and income quartile who receive FWS

Source: TICAS analysis of National Postsecondary Student Aid Study: 2016 Undergraduates <https://nces.ed.gov/datalab/powerstats/table/dqdkxf>

**Key Takeaway:** Due to the limited reach of FWS it is unlikely to result in improved SNAP access for the students who may need it most. Additionally, only a small number of states have state work-study programs, further limiting this exemption’s reach.<sup>47</sup>

**1.3 Student EFC \$0 Exemption<sup>48</sup>:** A person who meets income, household, and citizenship criteria and who is enrolled at least half-time in an institution of higher education may temporarily be eligible for SNAP if they have an expected family contribution (EFC) of \$0 in the current academic year. Guidance issued by Food & Nutrition Service (FNS),<sup>49</sup> clarified that this exemption can also be met by receipt of the maximum Pell grant award, by enrollment status.<sup>50</sup>

However, many students with an EFC over zero could be eligible for SNAP. Thirty-four states have used a policy called Broad-Based Categorical Eligibility to raise the gross income limit in SNAP over 130 percent FPL with an upper limit of 200 percent. As shown below and based on our analysis of federal data, a student exemption based on EFC \$0 excludes large numbers of students who could be eligible for SNAP. Our analysis shows that raising the EFC all the way up to at least \$8,000 would capture most students. However, raising the EFC would not affect students whose income exceeded the state’s FPL limit due to SNAP’s strict income criteria.

**Table 2. Expected Family Contribution by Income as a Percentage of Federal Poverty Level**

	Under 130%	130% to 200%	Over 200% <sup>51</sup>
\$0	87.9%	31.7%	1.1%
\$1-2,799	11.3%	46.6%	10.1%
\$2,800-7,999	0.5%	20.5%	26.4%
\$8,000-19,299	0.1%	1.0%	31.2%
\$19,300 or more	0.1%	0.2%	31.3%

Source: TICAS analysis of National Postsecondary Student Aid Study: 2016 Undergraduates <https://nces.ed.gov/datalab/powerstats/table/cflbov><sup>52</sup>

**Key Takeaway:** There have been many calls to make the EFC \$0 exemption permanent, but our analysis shows it would need to be raised well beyond EFC \$0 to adequately capture student need and SNAP eligibility.

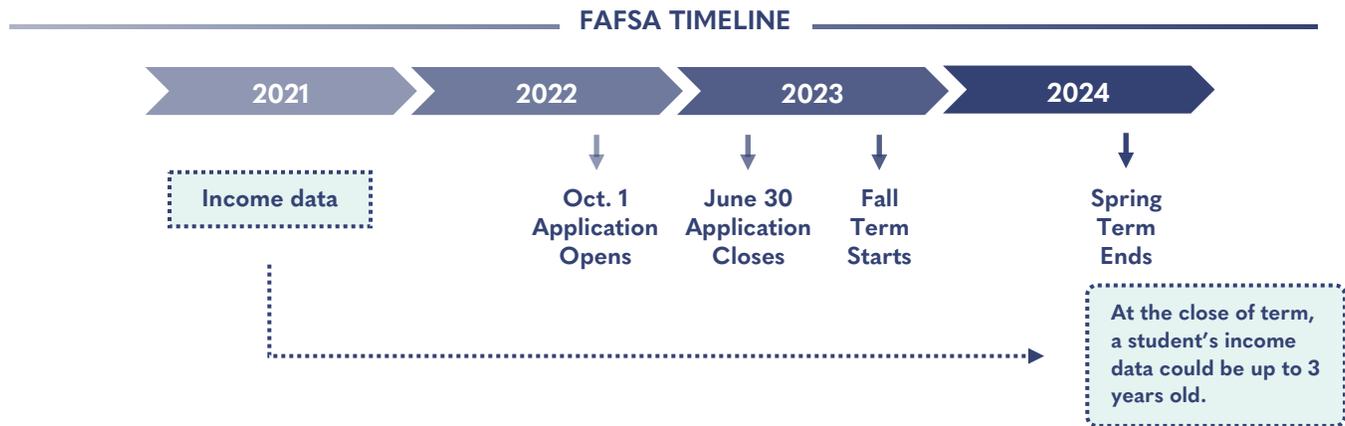
## Higher Education Calculations of Student Need

As set forth in the Higher Education Act, the government assesses student financial need to determine eligibility for certain types of federal financial aid. The Free Application for Federal Student Aid (FAFSA) collects data about income and assets to produce the Expected Family Contribution (EFC).<sup>53</sup> Many states also use the FAFSA to award state aid dollars.<sup>54</sup> College financial aid administrators then subtract the EFC from the student's total cost of attendance (COA) to determine their need for financial assistance as well as eligibility for other supports such as institutional and campus-based grant aid, work study or emergency aid. Upcoming changes will replace the EFC with the Student Aid Index (SAI). While the SAI is similar to the EFC, the name change is meant to more accurately reflect the meaning of the calculation as a determination of aid eligibility rather than an expectation of what a family can afford to pay for college.<sup>55</sup>

The complexities of the FAFSA and its EFC calculation have been well documented,<sup>56</sup> prompting upcoming changes.<sup>57</sup> Students and families persistently report confusion about when and why they need to complete the FAFSA,<sup>58</sup> frustration with the accuracy of their resulting EFC and how it is used by states and colleges. Less discussed but equally important are how college costs of attendance are set and the impact that has on access to aid. While the federal government regulates the cost elements that must be included in setting colleges' costs of attendance, and mandates disclosure of costs, colleges have wide latitude in how they estimate and set those costs. Research has found significant variation across colleges in how costs of living (e.g., housing, food, books, transportation and other non-tuition and fee costs) are estimated.<sup>59</sup> This is especially important for the over two-thirds of all undergraduate students who attend lower-cost public colleges, where living costs make up the majority of expenses for students.

The differences in the time between when the FAFSA is completed could significantly affect student eligibility for SNAP. The FAFSA uses adjusted gross income of a household's filed tax return or W-2 income from two years prior. SNAP uses recent average monthly income, usually 30 days prior to the application. This means, as the below timelines shows, by the time a student who is facing food insecurity applies for assistance the income data utilizing FAFSA data could be up to three years old.

Figure 2. FAFSA income determination does not align with SNAP Eligibility



**Key Takeaway:** The ability of the FAFSA to accurately capture student need, and college COA estimates to accurately reflect student costs, reduces the accuracy of using these calculations to assess student eligibility for SNAP.

Additionally, the different criteria that higher education and SNAP uses to assess household composition can negatively impact student access to SNAP. All calculations in the FAFSA originate by first determining whether a student is financially dependent (e.g., on their parents) or financially independent. That determines whose income is included in the application to determine financial need. A student who is determined dependent at the time of FAFSA completion but whose circumstances have changed would be less likely to qualify for a student exemption that could confer SNAP eligibility. Similarly, the FAFSA and SNAP also use age as a proxy for who should be included in the household that differs from each other. In both cases, the household unit and size significantly impact the assessment of aid or benefit determination, but they are not aligned in key ways.

Table 3. Differences in Household Size Definition Between FAFSA and SNAP

<b>FAFSA</b>	Dependent student status includes things such as not reaching age 24 by January 1 of the school year, being unmarried and not being emancipated or a foster youth. <sup>60</sup>
	Independent student status includes things such as reaching age 24 by January 1 of the school year, being a veteran, married, or having legal dependents other than a spouse. <sup>61</sup>
<b>SNAP</b>	A household is normally a group of people who live together and buy food and prepare meals together. Some people who live together, such as spouses and most children under age 22, are included in the same household, even if they purchase and prepare meals separately.

**Key Takeaway:** Differences between the FAFSA and SNAP that determine who and what income are included further disconnect students' living circumstances from student exemptions based on FAFSA data.

## Relying on Higher Education Calculations to determine SNAP Access

Identifying data from the FAFSA to confer student SNAP eligibility has been proposed as a path for reform. These efforts are important but concerns about the FAFSA's ability to fully capture student financial need present a core challenge to relying on it to connect students to SNAP. There is a significant gap in the income information used to determine financial aid eligibility and the income information used to determine SNAP eligibility. In addition, disconnects between the FAFSA and SNAP that include application cycles and household determinations affect student eligibility and access.

Research has shown minimal changes in federal aid eligibility for students from low- and moderate-income households year to year. This finding allowed the federal government to move FAFSA completion and the provision of aid information to families earlier in the college application process, which was a major improvement.<sup>62</sup> But relying on older income data means that for a student or family that experiences a change in household composition or income would need to navigate the little understood and underused financial aid professional judgement (PJ) process to override prior FAFSA information to access SNAP via an exemption.<sup>63</sup> This process is a barrier to addressing an immediate need for food assistance.

**Key Takeaway: FAFSA data is limited in its ability to predict a student's present financial circumstances. Similarly, changing FAFSA data to reflect students' current circumstances is complex and poorly understood. As a result, relying on FAFSA data to confer SNAP eligibility can exclude many students.**

## Policy Recommendations

Expanding student exemptions based on higher education determinants may appear to be an appealing solution for higher education policy experts focused on the intersection of food insecurity and student financial need. While they help some students, they also increase program complexity, which is cited as one of the biggest issues<sup>64</sup> to successfully communicating and administering SNAP for students. Further, we have no data that demonstrate which SNAP exemptions students benefit from as states are not required to collect and report exemption level data.

The SNAP program already imposes strict eligibility criteria based on household income and size, and measures to ensure applicants meet those criteria. We applaud USDA for prioritizing students in its 2024 agenda but advise against the student exemptions path for expanding SNAP eligibility, as it will require complex guidance, significant effort, and implementation costs for the government, states, and institutions. As a result, it is an ineffective way to substantively improve SNAP access for students.

**We urge Congress to instead consider the following common sense and bipartisan solution to better align federal workforce, higher education, and human services programs to meet programmatic mandates, reduce burden on institutions and students, and achieve desired policy outcomes:**

- ➔ Amend the Food and Nutrition Act to include postsecondary credentials an institution of higher education under definitions of "Employment and Training Program"; and
- ➔ Eliminate or significantly simplify the student exemption section.

These changes will produce the greatest likelihood of connecting SNAP participants to education as well as connecting postsecondary students to SNAP with the least complexity and administrative burden and cost.

**If Congress decides to keep the student exemptions, we recommend the following improvements to create moderate improvements in student access to SNAP benefits while leaving program complexity unaddressed:**

- ➔ Amend the Food and Nutrition Act to allow attendance at an institution of higher education to satisfy any activity or participation requirements; and
- ➔ Simplify student eligibility including eliminating enrollment intensity requirements that harm students attending less than half time.

## Conclusion

The evidence is conclusive that postsecondary credentials lead to improved self-sufficiency. Every level of postsecondary education achieved is correlated with improved social, economic, and health outcomes,<sup>65</sup> including higher earnings, lower unemployment and poverty rates,<sup>66</sup> and improved education outcomes for children.<sup>67</sup> Similarly, workers with a postsecondary education gain access to the majority of jobs with livable wages, employer-provided health and retirement benefits.<sup>68</sup>

The goal of federal policy should not be to limit pathways that lead to success but to facilitate the opportunity for people to identify and pursue a variety of education and career goals. Ensuring public programs improve access to education for people with low incomes is a common-sense bipartisan strategy. Virtually every state in the nation is working to improve their college completion efforts and many strive to connect people to public supports to improve their success. Removing education restrictions maximizes government spending across education and public benefits, better reflects the needs of the economy and improves the wellbeing of families and communities.

**Removing the barriers to postsecondary education in the SNAP program better reflects employer demands, higher education enrollment trends, state attainment goals, and the desires of students.<sup>69</sup>**

## Acknowledgments

The Institute for College Access & Success (TICAS) is a trusted source of research, design, and advocacy for student-centered public policies that promote affordability, accountability, access, and equity in higher education.

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## Endnotes

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