

# New GAO Report Underscores Need for Federal Reform in SNAP



The United States Government Accountability Office (GAO) recently released a report, “[Supplemental Nutrition Assistance Program: Estimated Eligibility and Receipt among Food Insecure College Students](#)”, presenting new data on the estimated eligibility for the Supplemental Nutrition Assistance Program (SNAP) among college students with low incomes. **The report paints a stark picture that, despite high levels of food insecurity among college students with low incomes, few students receive SNAP benefits. This research brings to the forefront how SNAP is failing to reach students who are likely eligible for SNAP as well as how the student eligibility rules are missing their intended target by wide margins.** These poorly targeted and redundant student rules have only created additional barriers to [postsecondary access and completion](#), despite evidence showing [demand for postsecondary credentials is only expected to increase](#), undermining federal and state investments in higher education.

## Student Food Insecurity

GAO found high levels of food insecurity among students, disproportionately so among certain student populations, using the Department of Education’s National Postsecondary Student Aid Study (NPSAS). **The report found that in 2020, 3.8 million college students (23 percent), reported experiencing food insecurity. Over half of these students (2.2 million) reported very low food security**, meaning they experienced multiple instances of skipping meals or eating less because they could not afford food. Food insecurity rates were highest for certain students including those attending private for-profit institutions and students attending Historically Black Colleges & Universities (HBCUs), reflecting longstanding [racial and economic inequities](#) students of color experience. Rates were also high among students experiencing homelessness, former foster youth, LBGTQIA students, and first-generation students. Food insecurity is associated with [less successful academic outcomes](#) and other negative effects on [health and wellbeing](#).

GAO estimated that among the 3.0 million food insecure students enrolled at least half time and therefore subject to the student SNAP restrictions in 2020, 38 percent were potentially eligible for benefits and 62 percent were not eligible. **Among the 38 percent of food insecure students who were potentially eligible for SNAP, GAO reported that almost 60 percent reported not receiving benefits in 2020. This means that the vast majority of students experiencing food insecurity are not receiving any food assistance through SNAP.**

38% of students enrolled at least half time were potentially eligible for SNAP benefits.

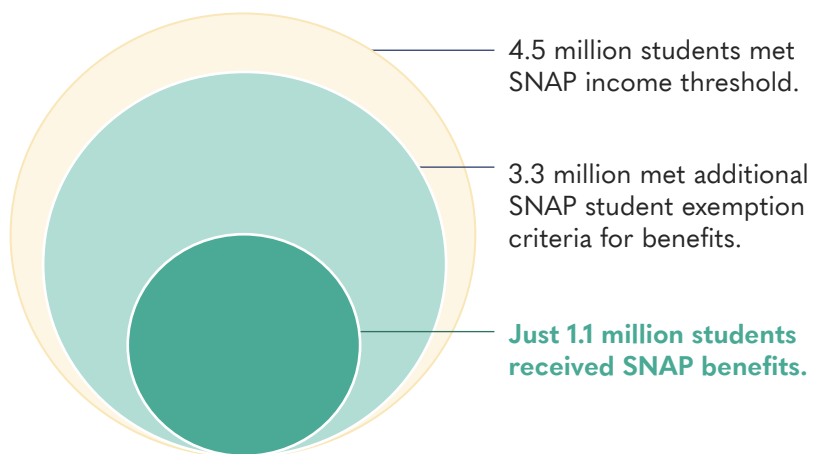
59% of these students reported not receiving benefits in 2020.



## SNAP Student Eligibility Rules Are Missing Their Target

SNAP is our nation's most successful anti-hunger program, proven to be highly effective at reducing food insecurity and stabilizing households. Everyone who applies for SNAP must have income below set poverty thresholds and meet certain citizenship and household criteria. On top of these requirements, people who are enrolled in an institution of higher education at least half-time may only qualify for SNAP if they meet at least one additional criterion (referred to as an exemption). These student eligibility restrictions were implemented due to concerns that students without earnings who were adequately supported by their parents would try to take advantage of SNAP, even if they were not food insecure. In stark relief to this goal, GAO found that 65 percent of financially independent students who were potentially eligible for SNAP did not report receiving benefits. **These new data show that SNAP is not reaching people who are likely eligible, financially independent, and striving to improve their economic security without support from their family.**

SNAP's standard eligibility criteria ensures that people who receive benefits demonstrate financial need. Despite this already stringent criteria, the added layer of student restrictions results in only a fraction of people being eligible compared to those who would be if they weren't students. GAO estimated approximately 4.5 million students who were enrolled at least half-time met the income thresholds for SNAP participation. However, only



3.3 million of these students met the additional SNAP student exemption criteria and among them over two-thirds reported not receiving any SNAP benefits. This means that only **about 1.1 million out of 4.5 million students living below the federal poverty level were receiving SNAP benefits. This makes clear that the student exemption requirements are not doing a good job at matching students with need to SNAP resources, despite incontrovertible evidence that education produces better economic outcomes.**

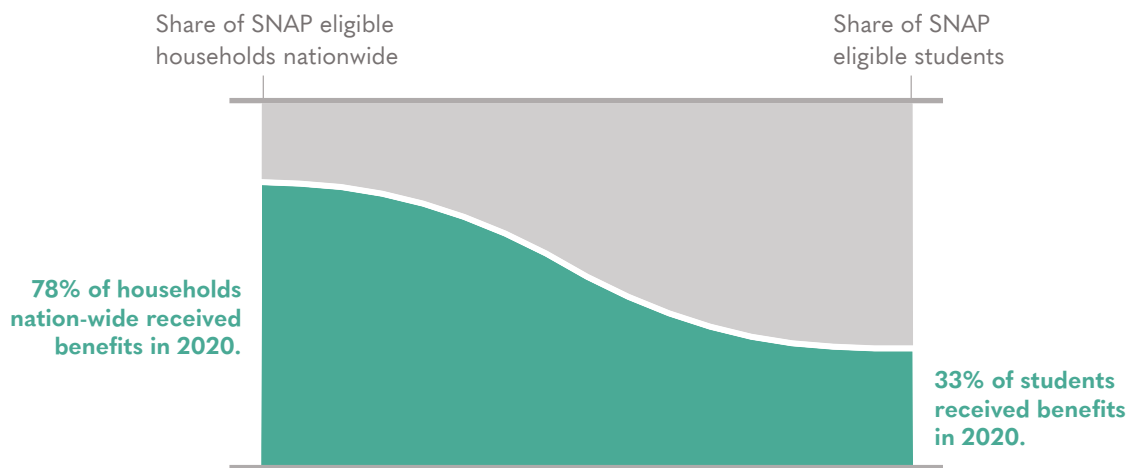
People with low incomes are jumping through every conceivable hoop to achieve the economic prosperity that could result from a college credential and are still not able to access SNAP. GAO showed that among the estimated 3.3 million students who were potentially eligible for SNAP in 2020, most of them were working at least 20 hours a week. Working too much while enrolled in college can have detrimental effects on student success, but it is necessary for many students and could be one of the only ways they can qualify for SNAP. Some people have proposed eliminating the 20 hour per week work exemption as it is often mistakenly associated with SNAP work requirements. However, in this case, removing the 20 hour per week exemption without other reforms to the SNAP student rules could harm the narrow set of students who qualify for SNAP through this exemption.

## SNAP is Failing to Reach Eligible Students

This report draws new attention to SNAP's failure to reach a substantive population sub-group that is demonstrably struggling with food security and is likely eligible for SNAP. This new evidence shows that even among students who appear to qualify for SNAP, only about one third reported receiving benefits, significantly lower than the participation rate among all SNAP eligible households.

**Research shows that in FY 2020 an estimated 78 percent of eligible households nationally received SNAP, versus the approximately one third of potentially eligible students as assessed by GAO. This represents an almost 50 percentage point gap between SNAP's ability to serve all SNAP-eligible households versus students. It is hard to imagine another sub-group of SNAP participants that the program is failing to reach at such spectacular rates.**

**The share of SNAP eligible students who received benefits in 2020 (approximately 33%) was significantly lower than the number of SNAP eligible households who received benefits nationwide (78%).**



GAO's research echoes pre-pandemic [data out of California](#) showing that only a fraction of students eligible for SNAP received benefits. SNAP includes [rigorous quality control standards](#) designed to ensure SNAP agencies accurately determine household eligibility and benefit amounts. It is unclear whether the federal government's Food and Nutrition Service's (FNS) quality control procedures assess the accurate determination of student eligibility, but this report suggests they don't or that they are failing on this metric. TICAS previously wrote about how [SNAP and higher education determinants of need are misaligned in critical ways](#), making it virtually impossible to accurately assess eligibility for SNAP using higher education data alone. Despite the challenges of using higher education data to estimate SNAP eligibility, the wide gap in the uptake of SNAP benefits between the general SNAP eligible-population and SNAP's ability to reach eligible students suggests a systemic failure to prioritize the accurate assessment of student eligibility.

## The Path to SNAP Reform

**This new evidence from GAO demonstrates how the SNAP program is falling short of its mandate in two key ways.** First, the program is not fulfilling its promise of reaching currently eligible students. Even among students who have low incomes and meet an exemption, participation in the program is abysmal, especially as compared to the broader SNAP eligible population.

Second, the report further demonstrates that SNAP's treatment of postsecondary education undermines the programs' own goals. The student eligibility rules fail to reach independent students and food insecure students, even if they appear to meet all the criteria. The student eligibility rules are excluding independent adults—often parents who have low incomes—missing the program's policy targets by wide margins.

These findings highlight the urgent need to ensure SNAP fulfills its responsibility of reaching people who are or want to be enrolled in college but are struggling to meet their basic need for food. SNAP is long overdue for modernizations that reflect the imperative for people with low incomes to have access to credentials that can improve their long-term financial prospects.

### To address these issues, TICAS recommends the following policy solutions:

- 1 Congress should revise the Farm Bill to include postsecondary credentials in the definition of "employment & training" programs. This modernization would better reflect demand for workers with more education and improve alignment across workforce development agencies and programs. The Workforce Innovation & Opportunity Act (WIOA), the Carl D. Perkins Career & Technical Education Improvement Act (Perkins Act), the Temporary Assistance for Needy Families (TANF) program, and subsidies through the Child Care & Development Fund (CCDF) already support the pursuit of postsecondary credentials and degrees.
- 2 The U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) should:
  - > Revise regulatory guidance regarding states' authority to determine postsecondary programs that meet the definition of an "employment and training (E&T)" program. At present, there is wide variation in states' understanding of what can be included due to inconsistent and conflicting guidance from regional offices that hampers efficiency and harms workforce and education alignment efforts across SNAP and SNAP Employment & Training (SNAP E&T).
  - > Ensure SNAP quality control procedures include the accurate determination of education components and student eligibility and hold states accountable for communicating current and accurate policies and guidance.
  - > Generate guidance for state agencies to better understand the options available to them under the student eligibility rules and create a report that articulates state decisions on these options.

**Ensuring our future workforce can afford food as they traverse the pathways necessary to fill in-demand jobs is a common sense, bipartisan goal. Removing the barriers to postsecondary education in SNAP aligns and maximizes government spending across higher education and public benefits, reflects investment in evidence-based approaches that improve employment outcomes, and supports the needs of the economy and ensures people can access family-sustaining wages.**