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# Frequently Asked Questions About SNAP and Students

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## Background

### ***Access to SNAP Promotes Food Security, Improves Wellbeing, and Reduces Poverty***

The Supplemental Nutrition Assistance Program (SNAP) is our nation’s most important anti-hunger program, providing food assistance to people with low incomes, including postsecondary students, workers, children, people with disabilities, seniors, and many more. SNAP helps approximately 38 million people in nearly 20 million households put food on the table each month.<sup>1</sup> In 2018, SNAP lifted 3.2 million people out of poverty, including 1.5 million children.<sup>2</sup> The SNAP program has been shown to support work<sup>3</sup>, stimulate economic growth,<sup>4</sup> improve academic outcomes for children<sup>5</sup>, and improve health outcomes for recipients.<sup>6</sup>

### ***Today’s College Students Require Greater Support***

The needs of college students have changed drastically over time, requiring more comprehensive supportive services that improve their ability to persist in and complete their education. For the first time since 1975, recent high school graduates from households with low incomes are enrolling in college at rates higher than their middle-income peers.<sup>7</sup> Most undergraduate students (71 percent) have at least one characteristic—such as single parenting or working part time—that makes it hard to attend college.<sup>8</sup> As a result, they’re less likely to finish school than “traditional” undergraduate students who often attend full time, don’t work during the school year, and/or receive financial support from their parents.

Estimates of food insecurity among college students range widely, from 9 percent to over 50 percent, depending on the methodology and population studied.<sup>9</sup> However, the U.S. Government Accountability Office (GAO) found that 7.3 million students—39 percent of all undergraduate students—were in households with incomes under 130 percent of the federal poverty level (FPL), and 29 percent of all undergraduates were in such households with low incomes and had another risk factor for food insecurity.<sup>10</sup> During the COVID-19 public health emergency, food insecurity rates have doubled overall and tripled in households with children throughout the nation. Now more than ever, it is critical that students have access to food assistance benefits.<sup>11</sup>

Food insecurity on college campuses disproportionately affects people of color. According to the Hope Center for College, Community, and Justice, 47 percent of Black students and 42 percent of Latinx students, compared to only 30 percent of their white counterparts, experience food insecurity at four-year institutions. At two-year colleges, the numbers increase, with 54 percent of Black students, 55 percent of Native American students and 47 percent of Latinx students experiencing food insecurity compared to only 37 percent of white students.<sup>12</sup> Due to racial, historical, and economic inequities, students of color experience much higher levels of insecurity than their white counterparts in meeting their basic needs.

### ***Few Students Receive SNAP in Spite of Need***

Food insecurity is associated with a range of negative health consequences<sup>13</sup> that interfere with students' ability to attend and complete college.<sup>14</sup> SNAP offers a modest assurance that people are able to meet their most basic human need for food. Studies have shown that lack of access to food and proper nutrition exacerbates stress, anxiety, and depression;<sup>15</sup> causes sleep disturbances and fatigue; and impairs cognitive functioning.<sup>16</sup> Access to SNAP relieves stress, improves vitality, and allows students to focus their energy on improving their educational and employment outcomes.

The GAO study found that approximately 1.5 million college students nationwide receive SNAP, but this is only a small share of those who could benefit from it. So few college students benefit from SNAP because of both eligibility restrictions discussed below and the fact that less than 4 out of 10 students who appear to be eligible for SNAP are receiving it.<sup>17</sup>

This brief explains the special eligibility rules for college students, describes what states and schools can do to expand access to SNAP, and answers other common questions about SNAP and students.

## **Are College Students Eligible for SNAP?**

### ***College Students are Eligible for SNAP if They Meet Additional Requirements***

Postsecondary students enrolled at least half-time must meet all of the standard SNAP eligibility rules, as well as one of several additional qualifications. Students must meet standard SNAP eligibility requirements such as income and asset limits, household qualifications, and immigration status. (See discussion starting on page 8.)

If students are enrolled at least half-time they may qualify for SNAP if they meet any **one** of the following 10 criteria:

1. responsible for a dependent child under 6,
2. responsible for a dependent child between ages 6 to 12 for whom they have trouble securing child care,
3. works at least 20 hours a week or 80 hours per month in paid employment,
4. receives Temporary Assistance for Needy Families (TANF) cash assistance or services,
5. is age 17 or younger or age 50 or older,
6. is a single parent enrolled full-time and responsible for a dependent child age who is 12 or under,
7. participates in a state or federally funded work-study program,
8. participates in an on-the-job training program,
9. is in school through a state or federally approved employment and training program, or
10. is unable or has a reduced capacity to work due to health reasons.<sup>18</sup>

In addition, lawmakers added two additional student eligibility criteria for SNAP to support students during the COVID-19 public health crisis. If students meet either of the below criteria, they are *temporarily* eligible for SNAP (assuming they meet the other SNAP eligibility rules):

1. Are eligible for federal or state-funded work-study programs during the regular school year or,
2. Have an expected family contribution (EFC) of \$0 during the current academic year or receive the full Pell Grant.

These temporary student eligibility changes for SNAP will remain in effect until 30 days after the federally declared COVID-19 public health emergency ends. Students will remain eligible until their next redetermination after that date. The U.S. Department of Health and Human Services has told states that the emergency is likely to remain in place for the entirety of 2021, and it will provide at least 60 days' notice prior to termination.<sup>19</sup>

### ***Are All College Students Subject to the Special Rules for Students?***

No, student restrictions do not apply to:

- individuals attending college less than half-time, as defined by the school.
- individuals who are in a program that does not require a high school diploma and is not a "regular" program of a college or university, even if most other students have a high school diploma. For example, a student enrolled in a vocational program or remedial education program that does not require a diploma is not considered a college student, even if the course is operated by a college and is located on campus.

### ***Are College Students Subject to the SNAP Time Limits for Childless Workers (also called Able Bodied Adults without Dependents, or ABAWDs)?***

No, student restrictions do not apply to:

When students are enrolled at least half-time and qualify for SNAP based on the student rules, they are not subject to the ABAWD time limit.<sup>20</sup> However, childless students without a documented disability who are enrolled in school *less than half-time* or are in an adult education or English as Second Language (ESL)

program may be subject to the ABAWD rule; if so, they must work at least 20 hours per week or they will be limited to 3 months of SNAP receipt in a 36-month period. Attending school will only count toward the required 20 hours if it is part of a SNAP Employment and Training program or another federal, state, or local work program.

### ***How Does Age or Disability Status Affect Student Eligibility For SNAP?***

- Individuals who are 50 or over or under 18 years old are exempt from the student exclusion (and are also not subject to ABAWD rules).
- Individuals who are unable to work or have a reduced capacity to work because of a disability (or temporary illness) are exempt from the student exclusion. This exemption does not require total and permanent disability at the level of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) eligibility but may require a medical note or other documentation. The specific rules for what qualifies are set at the state level. Many states recognized that students placed in colleges under the state's Vocational Rehabilitation Act program are also SNAP eligible because they have an incapacity but are able to become employable with additional training and education.

### ***Are Parenting or Caregiving Students Exempt from the Student Rule?***

In many cases, yes. The following parents or caregivers are exempt from the student rule:

- Parents caring for and living with a child under 6. (This exemption is not limited to single parents.)
- Single parent with a child under 12 enrolled full-time (as defined by the school).
- Parents responsible for a child between 6 and 12 years old and who cannot obtain adequate child care.
- Parents (including pregnant women) who receive TANF cash assistance.
- Parent exemptions are not limited to birth parents—grandparents and other caregivers may qualify as well.
- 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. This exemption can apply even if the student isn't actually employed; if child care is not available during the hours needed for classes; and if the only child care available is substandard, or not appropriate for the child.

### ***How Does Employment Affect SNAP Eligibility?***

- Students are exempt from the student exclusion if they are employed for pay at least 20 hours per week.
- States have the option to average hours of employment over a month and should do so to reduce the harm caused by variable hours of work.
- Schools may need to provide documentation of hours of work to students employed on campus (e.g., as course assistants) even if they are not paid on an hourly basis.
- Students are exempt if they are participating in a federal or state work-study program – even if they work fewer than 20 hours per week. (Note: During the COVID-19 public health emergency, students are eligible for SNAP if they are *eligible* for federal or state work-study. Even if the

students have not been placed in a work study placement, they are still eligible for SNAP under these temporary changes.)

### ***If Students Receive TANF Are They Exempt from Student Rules?***

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

### ***What Education and Training Programs Count for Exemptions from the Student Restrictions?***

Students who are enrolled in college as part of SNAP Employment and Training (E&T), Workforce Innovation and Opportunity Act (WIOA) programs, and Trade Adjustment Assistance programs are specifically exempted from the student restrictions.

- In addition, the federal statute exempts students who are enrolled in “another program for the purpose of employment and training operated by a State or local government.” **SNAP agencies have the power to decide what programs to count for this purpose.** Many programs in community colleges could reasonably count as a state or local program for the purpose of employment and training. Some states look at whether a program meets vocational components and goals similar to those identified under the Carl A. Perkins Career and Technical Education Act grants as an indicator, so SNAP offices are not required to individually assess programs. Career pathways programs, high-need credentials, and programs approved as training under Unemployment Insurance could also count.

### ***Why are SNAP Student Rules so Complex?***

The SNAP rules are based on an outdated image of who is a college student—the image of a traditional student right out of high school who comes from a middle-class family that can fully support all of the needs of their children in college. The lawmakers who created the SNAP rules were concerned that students who are being supported by their parents not receive SNAP benefits.<sup>21</sup> However, according to a study done by the U.S. Government Accountability Office, 71 percent of students are “non-traditional” students who are financially independent from parents.<sup>22</sup>

### ***What Can States Do to Expand College Student Access to SNAP?***

States have flexibility in identifying the programs offered at institutions of higher education that can be considered for the purpose of qualifying students for SNAP. These higher education programs, often at community colleges, must be operated by a state or local government, target households with low incomes, and help increase participants’ employability.

States also have flexibility in how they administer their SNAP E&T programs for current SNAP recipients not in school. Therefore, to expand access to SNAP, states should form partnerships with community colleges and other community partners that broadly serve students and households with low incomes to

deliver SNAP E&T program services to these SNAP recipients. For example, as part of a state's SNAP E&T program, a SNAP recipient could train to become a Certified Nursing Assistant at a community college. This SNAP recipient would be able to get employment and training services as well as support services such as transportation, child care, and textbooks because state SNAP E&T programs are required to provide necessary support services for recipients.

## The Basics about SNAP Benefits

### *How Much are SNAP Benefits Worth?*

The SNAP benefits are based on the U.S. Department of Agriculture's Thrifty Food Plan (TFP), currently set at \$204 per month for an individual, with larger families receiving more funds.<sup>23</sup> However, the Consolidated Appropriations Act of 2021 raised maximum SNAP allotments to 115 percent of the June 2020 value of the TFP from Jan. 1, 2021, through June 30, 2021. The American Rescue Plan Act of 2021, signed by President Joseph R. Biden on March 11, 2021, extends increases to the SNAP maximum allotments from July 1, 2021, through Sept. 30, 2021. Therefore, the maximum allotment of benefits for an individual based on temporary COVID increases is now \$234 per month, with family benefits similarly increased.<sup>24 25</sup>

Benefits are generally reduced for households with earned or unearned income. However, during the COVID-19 pandemic, most states are providing all households with the maximum benefit.<sup>26</sup> Expenses such as housing costs and child care are also taken into account in the benefit calculation. All federal financial aid is not countable for SNAP (see below).

### *How Are SNAP Benefits Paid? Where Can They Be Used?*

SNAP benefits are paid through Electronic Benefit Transfer (EBT) cards that can only be used to buy food. Most states make one distribution per month, although some split the benefit into multiple distributions. Recipients can use SNAP to buy their groceries at authorized retailers including grocery stores, discount stores, bodegas, and farmers markets that accept EBT. Generally, SNAP benefits cannot be used to buy hot meals or prepared foods, such as fast food or takeout pizza, unless a state has a Restaurant Meal Program allowing recipients who are elderly, disabled, or homeless to purchase prepared food at approved locations.

### *Can SNAP Be Used on Campus?*

Campus stores may be eligible if approved to take SNAP benefits; however, stores must meet certain requirements, including selling a mixture of foods. SNAP cannot be used to pay for college cafeteria meals because SNAP generally can't be used to purchase prepared meals unless a state has a Restaurant Meal Plan and the specific student qualifies for it based on homelessness or disability. If students live in a dorm and receive more than half of their meals from a meal plan, they are not eligible for SNAP. Due to the pandemic, the EBT online purchasing pilot program expanded across almost all states—allowing SNAP recipients to buy food online from certain grocery stores including Amazon and Walmart.

### ***What Are the Income and Asset Requirements for SNAP?***

Eligibility for SNAP is determined by a household's income and resources. Because the SNAP benefit is based on the funds available to the family to buy food, state agencies subtract deductions such as work expenses, child care, excess housing costs, and medical expenses from a household's gross income to determine its net income. The net income is used to determine the SNAP benefit amount.

Under standard rules, gross monthly income—that is, income before any of the program's deductions are applied—must be under a gross income test. A handful of states use the 130 percent federal poverty level (FPL) gross income test, but 45 states use higher gross income tests between 150 percent and 200 percent FPL.<sup>27</sup> For example, the poverty line in federal fiscal year 2019 for a family of three is \$1,778 per month; therefore, to be eligible for SNAP the income for a household of three must be less than \$2,311, which is 130 percent of the poverty line, in states using that threshold. Broad based categorical eligibility (BBCE) allows states to raise the gross income limit, if they so choose, to allow for high living expenses such as housing or child care. Most states have taken up the option under BBCE to use higher gross income tests, typically between 150 and 200 percent FPL. After applying deductions, an applicant's net income must be at or below the poverty line unless the household has a member over age 60 or the applicant is getting major disability benefits such as SSDI or SSI.

Households receiving SNAP without an elderly or disabled member can't have assets of more than \$2,250, and households with an elderly or disabled member can't have more than \$3,500 in assets.<sup>28</sup> However, most states have taken up BBCE, which allows states to eliminate or increase the asset limit to allow people to build savings—an important tool to exiting poverty.

### ***What Other Expenses Are Taken into Account?***

A standard deduction accounts for unavoidable costs that may affect a SNAP recipient's ability to afford food. Furthermore, if a household has earned income, the rules allow for a deduction equal to 20 percent of earnings. (Federal work-study is not countable income; see below.) In addition, applicants are allowed to take 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. Household members who are legally obligated to pay child support are allowed to take a child support deduction.

Households with an elderly or disabled member who has medical expenses over \$35 a month that are not paid by insurance or someone else receive a deduction for medical expenses. Lastly, rules provide for an excess shelter deduction that considers the household's housing costs, including utilities, when they exceed more than half of a household's income.

### ***Whose Income and Assets are Counted?***

According to federal SNAP policy, a household is considered to be a group of people who live together and buy groceries together for more than half of their meals, regardless of relation. However the relation is considered, when certain family members live in the household together—even if they purchase meals separately—they must be included in the same SNAP household. For example, 19-year-olds living at home full time must be included in the same SNAP household as their parents because children must be included in their parents' SNAP household until they reach 22 years of age. This is true even for

students who are living with their parents due to campus closures as a result of the COVID-19 public health crisis. Spouses must be included in one another's SNAP household.

If college students live with a roommate and they purchase and prepare food together for at least half of their meals, they are counted as a SNAP household and must apply together. All forms of income, including earned or unearned, for each household member over the age of 17 must be presented when applying for SNAP benefits. Special rules apply when one or more members of a household are ineligible for reasons that can include their immigration status or status as a student without meeting one of the student exemptions. While students can live in a household with other individuals receiving SNAP benefits, students are not counted in the total household number and their income and resources are not counted.<sup>29</sup>

### ***Do Students Need to Report Their Parents' Income?***

Income and assets of parents who do not live with the student are not counted. However, if parents or others provide students with ongoing financial support, that support may need to be reported as income unless it is clearly a loan. If students live at home with their parents but are at least 22 years old and buy and prepare their food independently, they can apply separately and do not need to report their parents' income. For students who live at home with their parents and are under the age of 22, they would need to report their parents' income and apply under the same SNAP household.

### ***In What State Should Students Apply for SNAP if They Live in One State but Attend School in Another?***

SNAP benefits follow students where they live. Students should apply for SNAP benefits in the state where they currently reside. For example, if a student attends school in Virginia, but lives in Maryland, that student should apply for SNAP benefits in Maryland (assuming they meet all SNAP eligibility criteria). There is not a minimum amount of time that someone needs to live in a state to apply for SNAP. To verify their state residency, the student applicant will be required to provide documentation, for example a utility bill, a license from the state of residence, a rental agreement, etc.<sup>30</sup>

### ***What are the Special Rules for Non-Citizens and Mixed-Status Immigrant Families?***

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 benefits. Non-citizen children under 18 who are "qualified immigrants" are eligible without a waiting period. However, non-citizen adults who are "qualified immigrants," such as Lawful Permanent Residents (LPRs), typically are subject to a five-year waiting period unless they are under age 18, have a disability, or meet other exemptions (for example, if they were previously refugees, granted asylum, etc.). Rules for non-citizens are complicated, and this section only captures a brief synopsis of the rules.

For mixed-status households, 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. While ineligible household members do not need to provide a Social Security number, they 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.

## Interaction of Financial Aid and SNAP

### *Does Financial Aid Count as Income?*

Federal financial aid is not treated as income for the purpose of determining eligibility for public benefit programs, including SNAP. This includes grants, scholarships, fellowships, work-study, and educational loans on which payment is deferred (including but not limited to Pell Grants and Federal Supplemental Educational Opportunity Grants (FSEOG)).<sup>31</sup> SNAP regulations authorize states to count non-federal financial aid that is used for normal living expenses (e.g., room and board). States may, however, disregard all educational assistance for SNAP if they do so for TANF or Medicaid and choose to align their SNAP policies with the other program.<sup>32</sup> Students may also ask financial aid offices to prioritize or earmark their state and private financial aid for tuition and fees first, and thus avoid having any financial aid count toward SNAP.

SNAP does not count private loans (from individuals as well as commercial institutions) as income.

### *Does Receiving SNAP Affect Financial Aid?*

SNAP benefits are not treated as income when calculating an expected family contribution (EFC) for financial aid. Any payment or reimbursements related to a student's participation in an education component under SNAP E&T is also not counted as income.

When students complete the Free Application for Federal Student Aid (FAFSA) and report that they or their families have received SNAP or other benefits in the past 24 months, they are eligible for a simplified needs analysis that does not require them to answer questions about family assets. If students receive SNAP and have family income under \$26,000, they qualify for an automatic zero EFC and can receive more financial aid.

## Conclusion

People with low incomes trying to pursue economic security by earning a college degree often forgo working more hours to attend school, reducing their income. Furthermore, many students earn low to moderate incomes, work part time, and are financially independent from their parents—but still experience food insecurity. And the COVID-19 public health emergency has only made these economic struggles even more difficult for many. Research shows that having low income is the highest risk factor for food insecurity among undergraduate students, yet almost 60 percent do not participate in SNAP.<sup>33</sup> Today, postsecondary students face many non-academic challenges, therefore, access to SNAP is critical because food insecurity is one of the greatest threats to student health, wellbeing, and academic success—especially for community college students. Moving forward, we must increase access to SNAP for postsecondary students by simplifying the eligibility rules and intentionally informing students who are already eligible but not currently receiving SNAP benefits.

## Endnotes

- <sup>1</sup> U.S. Department of Agriculture, "SNAP Participation," *Food and Nutrition Service*, September 2018, <https://fns-prod.azureedge.net/sites/default/files/pd/34SNAPmonthly.pdf>.
- <sup>2</sup> Liana Fox, *The Supplemental Poverty Measure: 2018*, U.S. Census Bureau, October 2019, <https://www.census.gov/content/dam/Census/library/publications/2019/demo/p60-268.pdf>.
- <sup>3</sup> Dottie Rosenbaum, "The Facts on SNAP, Part 2: SNAP Supports Work," *Center on Budget and Policy Priorities*, May 2013, <https://www.cbpp.org/blog/the-facts-on-snap-part-2-snap-supports-work>.
- <sup>4</sup> Nune Phillips, *SNAP Contributes to a Strong Economy*, Center for Law and Social Policy, August 2017, <https://www.clasp.org/sites/default/files/SNAP-Contributes-to-a-Strong-Economy.pdf>.
- <sup>5</sup> Nisha Beharie, Micaela Mercado, and Mary McKay, "A Protective Association Between Snap Participation and Educational Outcomes Among Children of Economically Strained Households," *Journal of Hunger & Environmental Nutrition*, 2017, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5513186/>.
- <sup>6</sup> Steven Carlson and Brynne Keith-Jennings, *SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs*, Center on Budget and Policy Priorities, January 2018, <https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-nutritional-outcomes-and-lower-health-care>.
- <sup>7</sup> "Table 302.30 - Percentage of Recent High School Completers Enrolled in College, by Income Level: 1975 Through 2016," *National Center for Education Statistics*, July 2017, [https://nces.ed.gov/programs/digest/d17/tables/dt17\\_302.30.asp?current=yes](https://nces.ed.gov/programs/digest/d17/tables/dt17_302.30.asp?current=yes).
- <sup>8</sup> Kathryn Larin, *Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits*, Government Accountability Office, December 2018, <https://www.gao.gov/assets/700/696254.pdf>.
- <sup>9</sup> Ibid.
- <sup>10</sup> Ibid., 8
- <sup>11</sup> Parker Gilkesson, "Despite Economic Relief Hunger is on the Rise and Families are Suffering," CLASP, July 2020, <https://www.clasp.org/blog/despite-economic-relief-hunger-rise-and-families-are-suffering>.
- <sup>12</sup> Sara Goldrick-Rab, Jed Richardson, Joel Schneider, et al., *Still Hungry And Homeless In College*, Wisconsin Hope Lab, April 2018, <https://hope4college.com/wp-content/uploads/2018/09/Wisconsin-HOPE-Lab-Still-Hungry-and-Homeless.pdf>.
- <sup>13</sup> Hilary Seligman, Barbara Laraia, and Margot Kushel, "Food Insecurity Is Associated With Chronic Disease Among Low-income NHANES Participants," *The Journal of Nutrition*, 2010, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2806885/>.
- <sup>14</sup> Irene van Woerden, Daniel Hruschka, and Meg Bruening, "Food Insecurity Negatively Impacts Academic Performance," *Journal of Public Affairs*, November 2018, <https://onlinelibrary.wiley.com/doi/full/10.1002/pa.1864>.
- <sup>15</sup> Adrienne O'Neil, Shae E. Quirk, and Felice N. Jacka, "Relationship Between Diet and Mental Health in Children and Adolescents: A Systematic Review," *American Journal of Public Health*, 2014, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4167107/>.
- <sup>16</sup> Michael Green, Peter Rogers, and Nicola Elliman, "Impairment of Cognitive Performance Associated With Dieting and High Levels of Dietary Restraint," *Physiology & Behavior*, 1994, <http://www.seven-health.com/wp-content/uploads/2018/08/Impairment-of-Cognitive-Performance-Associated-with-Dieting-and-High-Levels-of-Dietary-Restraint-.pdf>.
- <sup>17</sup> Ibid., 8.
- <sup>18</sup> Carrie Welton and Darrel Thompson, "SNAP and Students: Food Assistance Can Support College Success," *Center for Law and Social Policy*, December 2019, [https://www.clasp.org/sites/default/files/publications/2019/12/2019\\_snapandstudentsfoodassistance..pdf](https://www.clasp.org/sites/default/files/publications/2019/12/2019_snapandstudentsfoodassistance..pdf).
- <sup>19</sup> U.S. Department of Health and Human Services, Letter to Governors, <https://ccf.georgetown.edu/wp-content/uploads/2021/01/Public-Health-Emergency-Message-to-Governors.pdf>.
- <sup>20</sup> Food and Nutrition Service, "SNAP Work Requirements," *U.S. Department of Agriculture*, May 2019, <https://www.fns.usda.gov/snap/work-requirements>.
- <sup>21</sup> Ibid., 8.
- <sup>22</sup> Ibid., 8.
- <sup>23</sup> Food and Nutrition Service, "SNAP Eligibility," *U.S. Department of Agriculture*, August 2019,

<https://www.fns.usda.gov/snap/recipient/eligibility>.

<sup>24</sup> United States Department of Agriculture, Food and Nutrition Service, “SNAP Eligibility,”

<https://www.fns.usda.gov/snap/recipient/eligibility>.

<sup>25</sup> Carrie Welton, “Proposed House Farm Bill Would Harm Workers, Bring Back ‘Cliff Effects,’” *Center for Law and Social Policy*, April 2018, <https://www.clasp.org/publications/fact-sheet/proposed-house-farm-bill-would-harm-workers-bring-back-cliff-effects>.

<sup>26</sup> United States Department of Agriculture Food and Nutrition Service, “SNAP COVID-19 Emergency Allotments Guidance”, [fns.usda.gov/snap/covid-19-emergency-allotments-guidance](https://www.fns.usda.gov/snap/covid-19-emergency-allotments-guidance).

<sup>27</sup> United States Department of Agriculture, “Broad-Based Categorical Eligibility,” <https://fns-prod.azureedge.net/sites/default/files/resource-files/BBCESatesChart%28May2020%29.pdf>

<sup>28</sup> Food and Nutrition Service, “SNAP Work Requirements,” *U.S. Department of Agriculture*, May 2019, <https://www.fns.usda.gov/snap/work-requirements>.

<sup>29</sup> David Super, “SNAP for College Students: Low-Income College Students’ Eligibility for the Supplemental Nutrition Assistance Program,” *Journal of Poverty Law and Policy*, March-April 2011.

<sup>30</sup> Owen Daugherty, “U.S. Department of Agriculture Clarifies Where Eligible Students Should Apply for Expanded SNAP Benefits,” *National Association of Student Financial Aid Administrators (NASFAA)*, March 8, 2021,

[https://www.nasfaa.org/news-item/24943/U\\_S\\_Department\\_of\\_Agriculture\\_Clarifies\\_Where\\_Eligible\\_Students\\_Should\\_Apply\\_for\\_Expanded\\_SNAP\\_Benefits](https://www.nasfaa.org/news-item/24943/U_S_Department_of_Agriculture_Clarifies_Where_Eligible_Students_Should_Apply_for_Expanded_SNAP_Benefits).

<sup>31</sup> Title 7: Agriculture - Part 273—Certification of Eligible Households USCIS - Subpart D—Eligibility and Benefit Levels, Electronic Code of Federal Regulations, n.d., [https://www.ecfr.gov/cgi-bin/text-idx?SID=3c4a2243fb069f3e47c1e03fcaa25e4c&mc=true&node=se7.4.273\\_19&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=3c4a2243fb069f3e47c1e03fcaa25e4c&mc=true&node=se7.4.273_19&rgn=div8).

<sup>32</sup> Title 7. Subpart D. Eligibility and Benefit Levels Section 273.9 - Income and Deductions, *Cornell Law School*, August 2019, [https://www.law.cornell.edu/cfr/text/7/273.9#c\\_3](https://www.law.cornell.edu/cfr/text/7/273.9#c_3).

<sup>33</sup> *Ibid.*, 8.