**REVISED Policy Clarification**

**Employment & Training - EPP-21765-535**

**Submitted: May 31, 2024**

**May 9, 2024 Agency: CAOs**

**Subject: Revised Supplemental Nutrition Assistance Program (SNAP) Keystone Education Yields Success (KEYS) Referrals for General Studies Majors and Potential Community College Students**

**Question:** Our CAO would like to know how to process referrals for SNAP recipients who have not yet enrolled in community college or are General Studies majors at the community college. The following scenarios need clarified:

**Scenario 1:** A SNAP-only recipient is interested in enrolling in the community college in the next 60 days and meets a student “federal exemption” outlined in [SNAP HB 514.2](http://services.dpw.state.pa.us/oimpolicymanuals/snap/514_Students/514_2_Eligible_Students.htm). Since they are not yet enrolled in the community college, they do not have a major or class schedule. May the CAO refer the SNAP recipient to KEYS?

**Scenario 2:** A SNAP-only recipient meets a student “federal exemption” outlined in SNAP HB 514.2. They are enrolled in community college as a General Studies major, but they must enroll in this course of study temporarily even though they are planning to declare a career specific major. May the CAO refer the SNAP recipient to SNAP KEYS?

**Scenario 3:** Same question as Scenario 2, except the student does not meet a student “federal exemption” and is instead seeking to use their enrollment in community college to qualify for the “Pennsylvania’s expansion” student exemption described in SNAP HB 514.2. May the CAO grant the SNAP recipient a student exemption and refer to SNAP KEYS?

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| **Response By: Bureau of Employment Programs** | | **Date: May 10, 2024** |  |  |
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1. The CAO may refer the individual to KEYS. The pre-enrollment period prior to starting classes can be an especially vulnerable time for first-generation or low-income college students. The KEYS contractor will provide case management services during this time to assist the student to apply for the college and financial aid, encourage declaration of a major that is a High-Priority Occupation (HPO) or Perkins V course of study, and register for classes.

Students may continue enrollment in KEYS upon declaration of a major if they ultimately enroll in:

* + a major that is a HPO or Perkins V course of study; or
  + General Studies and have an intent to enroll in a HPO or Perkins V course of study

Students that do not enroll in a major or career pathway that meets the above requirements will be terminated from the KEYS program. Termination must occur within 45 calendar days of the date the KEYS contractor was notified that the student declared a major which does not meet the criteria.

1. The CAO may refer the individual to KEYS. Many community colleges require students to enroll in the General Studies major to complete pre-requisite classes prior to enrolling in a career specific major. Additionally, community college is an affordable and accessible path for individuals to obtain general education credits before transferring to another post-secondary educational institution.

In some cases, a community college may have the General Studies major included on their college’s list of Perkins V courses of study. In such cases, the college can complete the Community College Verification Form (PA 1959) and no further verification is required for the SNAP student to be referred to KEYS.

For colleges where General Studies is not considered a Perkins V course of study at the community college, the General Studies SNAP student may be eligible for a SNAP KEYS referral if they verify that they are interested in a career pathway that is an HPO or Perkins V course of study. The CAO may accept a statement from the community college to this effect; however, in some instances, the community college may not be willing or able to indicate a student’s intended career path. In these cases, the CAO can accept a statement from the KEYS contractor on community college letterhead indicating the student intends to enroll in an HPO or Perkins V course of study as verification of meeting the standard for a SNAP KEYS referral.

1. The CAO may refer the individual to KEYS if the student is attending one of the demonstration project colleges listed in the chart in SNAP HB 514.2 and meets the other criteria for the “Pennsylvania expansion”. The same principle in Scenario 2 applies to the SNAP eligibility exemption for students enrolled in a community college at least half-time in a career or technical education program under the Perkins V program or in a course of study associated with an HPO.

If a student meets the Perkins V/HPO student exemption and no other student exemption, they may not be referred to SNAP KEYS unless attending one of the demonstration project colleges listed in the chart in SNAP HB 514.2.

To establish the “Pennsylvania expansion” student exemption the CAO must not request verification from the KEYS contractor unless the student is eligible to enroll in KEYS at a demonstration project college listed in the chart in SNAP HB 514.2 and chooses to do so. The CAO may request the student obtain verification from the college using the [PA 1959](http://docushare.dpw.lcl/docushare/dsweb/Get/Document-6433463/PA1959-UF.pdf).

If the college is unwilling/unable to verify a student’s intended career path or transfer major, and the community college they are attending is not a demonstration project college, the CAO may accept a signed statement from the student themselves indicating their intended career path to establish eligibility SNAP student eligibility.

Since students are unlikely to know whether their intended career path aligns with an HPO, the CAO will identify the appropriate Classification of Instructional Program (CIP) code for the career path using the   
[U.S. Department of Education, National Center for Education Statistics website](https://nces.ed.gov/ipeds/cipcode/browse.aspx?y=56), then:

* + Identify whether the CIP code is on the PA Department of Education’s [online list of Career and Technical Education CIP codes](https://www.education.pa.gov/K-12/Career%20and%20Technical%20Education/Pages/CIP_codes.aspx); and
  + Identify all System of Occupational Classification (SOC) codes which correspond to the CIP code using Pennsylvania’s CIP-SOC Crosswalk, then determine whether one or more of the corresponding SOC codes are on the HPO list for the CAO’s local workforce area(s), adjacent local workforce area, or another workforce area if justified by the individual’s specific circumstances. Both the Crosswalk and the HPO list are available on the PA Department of Labor’s [website](https://www.workstats.dli.pa.gov/Products/HPOs/Pages/default.aspx).

If at least one of the criteria is met, the CAO will narrate that the student’s intended career path is a career or technical education program and/or associated with an HPO, and that they thus meet a student eligibility exemption.