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DATE: Revised June 12, 2023
March 19, 2018

OPERATIONS MEMORANDUM #18-03-04

SUBJECT: REVISED Changes to Supplemental Nutrition Assistance Program (SNAP) Eligibility for Community College Students and SNAP Keystone Education Yields Success (KEYS) Program

TO: Executive Directors

FROM: Tanoa Fagan
Director
Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) of changes to SNAP eligibility for certain community college students enrolled at one of Pennsylvania's 15 community colleges. This change expands the definition of an "eligible student" under SNAP and enables low-income community college students who are currently ineligible for SNAP to qualify. This change will be effective as of the issuance of this memo.

Additionally, this memo makes changes to referral criteria for the SNAP KEYS program, effective January 1, 2018. These changes reflect what courses of study will be considered eligible to participate in a SNAP KEYS program.

BACKGROUND

Community colleges offer a range of programs and degrees that enhance the employability of individuals or lead directly to employment. Community colleges annually identify students enrolled in career or technical educations programs under the Strengthening Career and Technical Education for the 21st Century Act (P.L. 115-164), also known as Perkins V. A student identified by the community college or certified as enrolled in a career or technical education program that will lead directly to employment meets the definition of an eligible community college student for SNAP.

Federal regulations at 7 CFR §273.5(b)(11)(iv) allow states to determine whether certain training programs not funded under the SNAP program are comparable to a SNAP Employment and Training (SNAP E&T) activity. Students enrolled in a training program which has been deemed comparable to a SNAP E&T activity may receive SNAP if otherwise eligible. DHS has determined that most courses of study at Pennsylvania's 15 community colleges are

comparable to a SNAP E&T activity and improve employability which will make some college students eligible for SNAP.

DISCUSSION

Students enrolled in higher education programs more than half time are ineligible for SNAP unless they meet requirements outlined in federal regulations at 7 CFR §273.5. While students with disabilities or young children or those working 20 hours a week or receiving work-study are eligible, most other students are not.

NOTE: Per SNAP Handbook 550.58, work-study income is excluded for SNAP.
NOTE: Students enrolled less than half time may be eligible for SNAP regardless of course or program.

Effective with the posting of this memo, the CAO will review and explore the possibility that the student is attending one of the state's 15 community colleges, and is enrolled in a career or technical education program under the Perkins V Program or in a course of study associated with a High-Priority Occupation (HPO) as verified by the college. Such courses of study are considered likely to lead directly to employment.

To be eligible for SNAP under this new policy, a student must:
- Be attending community college at least half-time; and
- Be considered by the community college to be pursuing a career or technical education program under Perkins V or a course of study associated with an HPO.

If the student meets these two eligibility requirements, no other student eligibility factor must be met. This new policy is intended to eliminate the penalty faced by able-bodied students without dependents who are seeking training in HPO.

A new form, the *Community College Verification Form*, has been developed to assist in verifying student eligibility (Attachment 1). However, the CAO will accept any verification which reasonably establishes that the student meets the criteria above. This could be a signed letter from a community college official stating the course of study and that the student is enrolled more than half-time in a program that meets the Perkins V or HPO guidelines. The provided verification should include:

- Enrollment status;
- The student's course of study or major; and
- Whether or not the student is enrolled under the Perkins V Program, or a course of study associated with an HPO.

The 15 community colleges in Pennsylvania are:

Bucks County Community College	Butler County Community College
Community College of Allegheny County	Community College of Beaver County
Community College of Philadelphia	Delaware County Community College
Erie County Community College	Harrisburg Area Community College
Lehigh Carbon Community College	Luzerne County Community College
Montgomery County Community College	Northampton Community College
Pennsylvania Highlands Community College	Reading Area Community College
Westmoreland County Community College	

The CAO will use SNAP student code "13 – Placed in Inst of Higher Ed by JTPA, ETP, Sect 236 of the 1974 Trade Act or a State or Local E&T Prog approved by FNS" and narrate that the individual is eligible under the Perkins V program, or a course of study associated with an HPO.

SNAP KEYS:

Students who are newly eligible for SNAP under this policy may **not** be referred to SNAP KEYS.

Exception: Students enrolled in Harrisburg Area Community College (HACC) will be permitted to participate in SNAP KEYS as part of a demonstration project. Effective date of republication, this demonstration project is being expanded to also include students enrolled in Butler County Community College (BUTC), Montgomery County Community College (MCCC), the Community College of Allegheny College (CCAC), and the Community College of Philadelphia (CCOP). Affected CAOs will receive an Information Memorandum informing them of the demonstration project's start and end dates. After that demonstration, DHS will do an analysis and make a determination regarding further expansion of eligibility for enrollment in SNAP KEYS. During the demonstration period, the CAO should encourage HACC, BUTC, MCCC, CCAC, and CCOP students who are newly eligible for SNAP to enroll in the KEYS program.

SNAP KEYS offers case management services and facilitates communication between the CAO and the student. SNAP students eligible for a KEYS referral may participate in KEYS, whether some or all their expenses are paid by other sources. Special Allowances (SPALs) may only be issued for expenses which are **not** being paid otherwise and where the student meets all other eligibility criteria. SPALs will be evaluated each semester/term.

In addition, effective January 1, 2018, **all** new SNAP KEYS students **must** be enrolled in a course of study which either meets Perkins V criteria or which is associated with a High-Priority Occupation (HPO). The CAO will verify that newly referred students meet these criteria using the *Community College Verification Form* or any other verification which reasonably

establishes that the criteria are met. Students who previously enrolled in KEYS will be considered "grandfathered" into the program and may continue participating in SNAP KEYS as long as they remain otherwise eligible.

Able-Bodied Adults Without Dependents (ABAWD)

The CAO will assign SNAP ETP code 20 and SNAP Qualification (Qual) Code 03 to a client who is enrolled in school at least half time, unless a lower SNAP ETP Code or Qual Code applies. Clients are considered **exempt** from the ABAWD time limit while enrolled at least half time.

Newly-eligible students who volunteer for the HACC pilot KEYS program are considered volunteers. Their hours will be tracked by the KEYS contractor, but they are **not** subject to the 80 hour/month requirement.

If the individual is enrolled in school less than half time, the CAO will review to determine if the individual meets any other ABAWD exemptions.

NEXT STEPS

1. Distribute this Operations Memorandum with appropriate staff.

2. Questions about this Memorandum can be directed to the Bureau of Employment Programs at (717) 787-1302.

Attachments

Attachment 1: [Community College Verification Form](#)

Attachment 2: [SNAP Community College FAQ](#)