

Policy Clarification
Supplemental Nutrition Assistance Program (SNAP)
All – PFS-22082-514
Employment & Training – EPP-22082-535

Submitted: March 5, 2025

Agency: CAOs

Subject: Countability of In-Kind and Unpaid Work for Supplemental Nutrition Assistance Program (SNAP) Student Eligibility

Question: A college student applied for SNAP and provided verification that she is working for her college in an “assistantship” role. In the student’s written agreement with the college, the college indicates that in exchange for the student working 20 hours per week, the college will waive the student’s tuition cost. Is this sort of arrangement considered to meet the student exemption for working 20 hours per week? Is this countable income?

Response By: BEP and BOP DFPPM

Date: March 18, 2025

Yes, the student is considered to meet a student exemption because they are working 20 hours per week in exchange for in-kind compensation.

An assistantship is considered both employment and a form of educational assistance. Since the individual is working in exchange for goods or services (in this instance, tuition), they are considered to be **paid in-kind** for their employment, which meets the requirements of the student exemption detailed in 7 CFR § 273.5(b)(5).

The County Assistance Office (CAO) must verify the *hours* the student is required to work in the assistantship in order to receive the tuition reduction.

NOTE: If the student is required to work less than 20 hours per week in the assistantship in order to receive the tuition reduction, they may combine additional hours of outside paid employment to meet the 20 hour per week requirement.

The CAO must verify that goods or services (e.g., tuition reduction) are being received in exchange for in-kind work. While hours spent working in in-kind employment such as an assistantship may be countable for purposes of the student exemption, hours spent working in unpaid employment (such as an unpaid internship) are not countable.

Since the student's assistantship is also a form of educational assistance, the CAO must exclude the *amount* of in-kind income received when determining financial eligibility and allotment (SNAP HB 550.58).