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JUNE 12, 2023

OPERATIONS MEMORANDUM # 23-06-01

SUBJECT: **REVISED SNAP Eligibility for Students**

TO: Executive Directors

FROM: ~~Tanea Fagan~~ **William Schabener**
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PURPOSE

To inform County Assistance Offices (CAOs) of changes to Supplemental Nutrition Assistance Program (SNAP) eligibility for certain students enrolled in an institution of higher education (IHE).

This memorandum expands the definition of an “eligible student” under SNAP, enabling certain low-income college students who are currently ineligible for SNAP to qualify. This change will be effective upon the issuance of this memorandum.

BACKGROUND

Students enrolled in an IHE at least half time are ineligible for SNAP unless they meet at least one exemption listed in [SNAP Handbook 514.2](#) and 7 CFR §273.5.

The Mickey Leland Memorial Domestic Hunger Relief Act (Pub. L. 101-624) and regulations at 7 CFR §273.5(b)(11)(iv) allow states to identify state or local government-operated programs that enhance the employability of low-income residents. A student enrolled in an IHE either *through* or *in compliance with* the requirements of an identified program may receive SNAP if otherwise eligible. In OPS 18-03-04, DHS used this flexibility to permanently expand eligibility for SNAP to certain students at Pennsylvania’s 15 community colleges.

DISCUSSION

DHS has found that some students enroll in an IHE *through* government-operated pre-college programs that serve low-income students, enhance their employability, and help them transition to college. These students qualify for an exemption for the duration of their attendance at the IHE.

DHS also identified several state-sponsored on-campus activities which enhance employability and primarily serve low-income students. Participants in these programs are deemed to be enrolled in an IHE *in compliance with* the requirements of these programs. These students qualify for an exemption while participating in the program.

Students who participate in programs that meet the following criteria may now receive SNAP if otherwise eligible:

- Program primarily serves students from low-income households;
- Program is operated by a state or local government, or an instrumentality thereof; **and**
- Program provides the equivalent of at least one allowable activity under SNAP E&T.

Students Enrolled *through* Programs that Increase Employability

DHS has determined the following government-operated programs help prepare low-income students for post-secondary education and enhance their employability. Upon completion of such a program, students may choose to enroll in an IHE – including **any** college or university. If they do so, students are considered to have enrolled in an IHE *through* a program which increases employability and qualify for a student exemption and SNAP benefits for the duration of their attendance at the IHE if otherwise eligible. These programs include:

- **TRIO Upward Bound:** The TRIO Upward Bound program, operated by local and state government partners, prepares first-generation low-income high school students for college. Upward Bound increases participants' secondary and post-secondary education completion rates, thus increasing employability. Upward Bound also includes cultural opportunities, one-on-one counseling, and job shadowing opportunities. Students placed into an IHE after participating in Upward Bound are considered to be enrolled in an IHE *through* a program equivalent to SNAP E&T.
- **GEARUP:** Gaining Early Awareness and Readiness for Undergraduate Programs (GEARUP) is a college readiness program operated in Pennsylvania by local public school districts. All GEARUP participants come from low-income households, and all GEARUP school districts must also meet low-income criteria. GEARUP students participate in enrichment activities, including financial literacy training, job shadowing, college/career fairs, and non-cognitive skills development. Students who enroll in an IHE after participating in GEARUP are considered to have been placed into an IHE *through* a program equivalent to SNAP E&T.
- **ELECT:** The Education Leading to Employment and Career Training (ELECT) program assists low-income pregnant and parenting individuals

under age 22 who are attending an approved educational entity. This includes noncustodial parents who have established parentage. The program supports those finishing high school or a high school-equivalency program. ELECT facilitates college readiness and attendance and improves employability through case management, career exploration, assistance with financial aid, and college tour opportunities. Students placed into an IHE after participating in ELECT are considered to have been placed into an IHE *through* a program equivalent to SNAP E&T.

- **Title II Adult Basic Education:** PDE operates adult education programs under Title II of the Workforce Innovation Opportunity Act (WIOA) through local contractors. These programs, which serve a largely low-income population, include the Adult Basic Education (ABE) and Adult Secondary Education (ASE) programs, and can support the transition to postsecondary education/training. Students who enroll in an IHE after participating in a Title II program are considered to be enrolled in an IHE *through* a program equivalent to SNAP E&T.
- **Chafee Education and Training Grant:** The John H. Chafee Foster Care **Program for Successful Transition to Adulthood** includes multiple interrelated services for youth in foster care **including aftercare services for youth who exited foster care at 14 or older**. County children and youth agencies provide Independent Living (IL) services **to prepare youth, ages 14-21, for their transition from foster care to independence**. IL services include activities that improve the employability of youth. **Former foster youth between the ages of 14-23 may receive aftercare services**. Youth **who meet the eligibility requirements are** also eligible to receive the Chafee Education and Training Grant (ETG), **to assist** those pursuing postsecondary education. Students who enroll in an IHE and receive Chafee ETG are considered to be enrolled in an IHE *through* a program equivalent to SNAP E&T.

Students Enrolled *in Compliance with Programs that Increase Employability*

DHS has determined that compliance with the following government-operated programs supports the enrollment of low-income students in an IHE and enhances employability. Students are considered to be enrolled in an IHE *in compliance with* a program which increases employability and qualify for a student exemption and SNAP benefits while they are participating in such a program if otherwise eligible. These programs include:

- **Act 101 Programs:** The Pennsylvania Higher Education Equal Opportunity Act of 1971 (Act 101) is a state grant program administered by the Pennsylvania Higher Education Assistance Agency (PHEAA). Many IHEs in Pennsylvania operate Act 101 programs, and eligibility is restricted to students who are economically and educationally disadvantaged. Act 101 programs provide an array of services to increase

students' college completion rates and employability through remedial education support, mentoring, counseling, time management education, basic computer education, and career planning. Students enrolled at an IHE who participate in Act 101 programming are considered to be enrolled at the IHE *in compliance with* a program equivalent to SNAP E&T.

- **Fostering Independence Tuition Waiver Program:** The Fostering Independence Tuition Waiver Program **known as FosterEd**, created by Act 16 of 2019, seeks to remove barriers to accessing a postsecondary education for youth who are, or have been, in foster care. The program is administered collaboratively by PHEAA in conjunction with PDE, DHS, and the Pennsylvania Department of Labor and Industry (DLI). **Chafee ETG and FosterEd eligibility requirements mirror each other however, there may be instances where individuals may not receive a Chafee ETG award but will still be eligible for FosterEd.** All Pennsylvania colleges and universities award the waiver to eligible students. **FosterEd** recipients have access to a point-of-contact who provides referrals to on- and off-campus resources and support services. Students enrolled at an IHE who receive **FosterEd** are considered to be enrolled at the IHE *in compliance with* a program equivalent to SNAP E&T.

Certifying Additional Programs that Increase Employability

The above list of programs is not intended to be exhaustive. In addition to the programs listed in this memorandum, there may be other local programs that meet all three criteria for certification. The Bureau of Policy and Bureau of Employment Programs will jointly certify programs which meet all three criteria and inform the CAO of the final determination. If CAOs receive an inquiry from a college about adding a specific program to the list of eligible programs, the CAO should send contact details of the organization requesting certification to RA-PWSNAPIHEE@pa.gov. Colleges may submit their formal requests directly to RA-PWSNAPIHEE@pa.gov using the SNAP College Program Checklist ([Attachment 1](#)).

The CAO may reference the SNAP Student Qualifying Program Desk Guide for the current list of qualifying programs. This Desk Guide will be made available on OIMWeb and will be updated regularly as additional programs are approved.

Additional Programs that Establish a Student Exemption

In addition to those programs which qualify under SNAP E&T equivalence criteria, certain additional training programs meet separate federal exemption criteria:

- **TANF RESET:** Students who are currently receiving TANF benefits receive a SNAP student exemption. The CAO will also grant an exemption to students who originally enrolled in an IHE through a TANF

RESET program, such as TANF KEYS, and are still enrolled at the same institution, even if the student is no longer receiving TANF or participating in the TANF RESET program.

- **WIOA Title I:** In Pennsylvania, local Workforce Development Boards (WDBs) administer WIOA Title I services through PA CareerLink® centers. In many cases, the PA CareerLink® will award individuals eligible under Title I an Individualized Training Account (ITA). ITAs can be used to pay for a training at any eligible training provider, including IHEs. Students enrolled in an IHE through WIOA Title I meet an exemption from student rules and may receive SNAP if otherwise eligible.
- **Bridge Programs and Remedial Programs:** Students enrolled in a school which is not an IHE currently receive a SNAP student exemption. An IHE normally requires a high school diploma or equivalency certificate to enroll. Effective immediately, the CAO will also grant an exemption to students who are enrolled in an IHE, but in a *specific curriculum* which does not normally require a high school diploma or equivalency certificate to enroll. This includes:
 - specialized “GED Bridge” programs offered by colleges to help individuals who have not yet obtained a diploma or GED to obtain both their high school equivalency and career-specific training;
 - college curricula consisting of English-as-a-Second-Language (ESL) and/or remedial classes; and
 - vocational courses of study which do not require a diploma or GED as a prerequisite of enrollment, even if located at a college that has that prerequisite for other courses of study.

Verifying Program Participation

Students enrolled in an IHE *through* qualifying programs must provide verification at application or upon enrollment in the IHE. This verification remains valid for the duration of the degree program in which they are enrolled.

Students enrolled in an IHE *in compliance with* qualifying programs must provide verification at application or upon enrollment, **and** at each subsequent renewal.

While qualifying programs bear some similarity to E&T, students are **not** required to provide time sheets or other proof of participation on a weekly or monthly basis. Neither the CAO nor any E&T contractor is required to track monthly participation hours for purposes of maintaining the exemption.

SNAP Comparable Program Verification Form ([Attachment 2](#)) has been developed to assist in verifying factors of student eligibility. However, the CAO must accept any document that reasonably establishes an exemption.

Meal Plans

Students who receive more than half of their meals through a meal plan are ineligible for SNAP, even if they meet an exemption. “More than half” shall mean a meal plan that offers 11 or more meals per week. Many universities offer at least one meal plan option that pays for 10 or fewer meals per week. The CAO will not treat these meal plans as providing more than half of a student’s weekly meals.

Many universities offer “block” plans that provide a flat number of meals to be used throughout an entire semester. The CAO may calculate the number of weekly meals these plans provide by dividing the number of meals for the semester by 15 (the typical number of weeks in a college semester). For example, Kutztown University’s 150 Block meal would be deemed to provide 10 meals per week.

Meals which a student receives irregularly through student-to-student donation programs like *Swipe Out Hunger* will not count toward the 11 or more meals calculation.

The CAO should request verification of the student meal plans. This can be a statement by the college or a collateral contact with the college itself. There is no specific document that is required to be used for this verification.

NEXT STEPS

1. Review this Operations Memorandum with appropriate staff.

ATTACHMENTS

[Attachment 1: SNAP College Program Checklist](#)

[Attachment 2: SNAP Comparable Program Verification Form](#)