

DATE: May 19, 2023

OPERATIONS MEMORANDUM #23-05-01

SUBJECT: Student Eligibility Changes for the Supplemental Nutrition Assistance Program (SNAP) due to the end of the Federal Public Health Emergency (PHE)

TO: Executive Directors

FROM: Tanoa Fagan
Director
Bureau of Operations

PURPOSE

To clarify what is considered enrollment in an institution of higher education for SNAP purposes and to inform County Assistance Offices of the updated procedures for SNAP Student eligibility expansion now that the PHE is ending.

BACKGROUND/DISCUSSION

Clarification on Institutions of Higher Education

Federal regulations require students enrolled in an institution of higher education half-time or more to meet a student exemption to be eligible for SNAP. The United States Department of Agriculture's Food and Nutrition Service has provided clarification on what qualifies as enrollment in an institution of higher education for SNAP purposes, in addition to providing guidance on how the end of the federal PHE impacts the temporary student exemptions allowed during the PHE.

A student is considered enrolled in an institution of higher education if they are enrolled in a business, technical, trade, or vocational school AND in a curriculum that normally requires a high school diploma or equivalent. If a student is enrolled in one of these schools but is not in a curriculum that requires a high school diploma or equivalent, they do not need to meet a student exemption to qualify for SNAP, provided they meet all other normal SNAP eligibility requirements.

A student is also considered enrolled in an institution of higher education if they are enrolled in a regular curriculum at a college or university that offers degrees, regardless of whether a high school diploma is required. If the student is enrolled in a program outside of the regular curriculum, they are not considered enrolled in an

institution of higher education and do not have to meet a student exemption. Special programs outside of the regular curriculum could include things such as remedial education, continuing or community education, English for Speakers of Other Languages, and workforce development/training programs.

NOTE: If the student is enrolled less than half-time, they do not need to meet a student exemption to qualify for SNAP, provided they meet all other normal SNAP eligibility requirements.

End of the PHE

The PHE ended on May 11, 2023. Based on the Consolidated Appropriations Act of 2021, the following procedures should be followed regarding the Temporary Expansion to SNAP Student Eligibility established in OPS 21-01-02:

At Application:

- Any application received in office and date stamped by June 9, 2023, should be reviewed using the temporary expansion criteria listed in OPS 21-01-02. If the application is being reviewed during the reconsideration period, the temporary expansion criteria should still be applied.
- Any application received in office after the close of business on June 9, 2023, that is date stamped June 10, 2023, or later, should use only the student criteria listed in SNAP Handbook chapter 514 and OPS 18-03-04.

At Renewal:

- Any recertification application received in office and date stamped by June 30, 2023, should be reviewed using the temporary expansion criteria listed in OPS 21-01-02. If the recertification application is being reviewed during the reconsideration period, the temporary expansion criteria should still be applied.
- Any recertification application received in office after close of business on June 30, 2023, and date stamped July 1, 2023, or later, should use only the student criteria listed in SNAP Handbook chapter 514 and OPS 18-03-04.

NEXT STEPS

1. Review this Operations Memorandum with appropriate staff.
2. Direct questions regarding this Operations Memorandum to your Area Manager.