



Getty Images / Kanawa_Studio

Executive Summary for Connecting Community College Students to SNAP

*Lessons from states that have expanded SNAP access and
minimized the “work for food” requirement*

CLASP
The Center for Law and Social Policy

**Ashley Burnside and Parker Gilkesson of
CLASP, and Patricia Baker of MLRI**

MLRI
Massachusetts Law Reform Institute

April 2021

Introduction

Today, many people attending community college are first-generation students from families with low incomes and students who are financially independent from their parents. Before COVID-19, too many of them were hungry—a hardship exacerbated by the pandemic. Policy barriers in the Supplemental Nutrition Assistance Program (SNAP), including student work requirements known as “work for food” rules, have maintained this threat to student learning, health, and stability. **State policymakers, education agencies, college administrators, and advocates can reduce food insecurity among college students with low incomes by expanding their access to SNAP.**

In this report, the Center for Law and Social Policy (CLASP) and Massachusetts Law Reform Institute (MLRI) recommend two primary pathways to do so: taking full advantage of temporary federal COVID-19 relief SNAP student provisions while also adopting lessons from other state experiences in making SNAP more accessible to students. This report provides a detailed look at how Massachusetts and Pennsylvania expanded nutrition aid to community college students.

Robust implementation of federal pandemic relief measures can reduce student hunger

In the near term, state higher education agencies and college financial aid administrators can expand student access to SNAP by providing outreach to students on SNAP student provisions from the Consolidated Appropriations Act of 2021. The temporary changes impact students who receive work study, have an “expected family contribution” (EFC) of \$0, or receive a maximum Pell Grant.

Recommendations include:

- Ensuring all financial aid communications advise students of potential SNAP eligibility;
- Advising students of their right to amend or appeal their EFC determination;
- Advocating with SNAP agencies to accept a broad range of proof from students;
- Using social media to advise students about the new SNAP rules and how to apply.

States can help more students access SNAP by implementing the federal (3)(D) provision

States can make permanent changes to provide SNAP for more students with low incomes by advancing a key federal SNAP exemption. Specifically, under federal law, states can provide SNAP to college students enrolled in “state or locally-administered” education or training programs where:

- their college degree or certificate is considered “career or technical education” and/or
- their college degree or certificate will improve their employability

Massachusetts and Pennsylvania successfully implemented this federal option in 2010 and 2018, respectively, while addressing SNAP state agency administrative concerns. Those strategies are highlighted in this report. A few other states have implemented similar policies. This report dives into the federal statutory and regulatory opportunities around this provision, with case studies from both states on their implementation steps.

States can go further in lifting barriers to SNAP, during and beyond the pandemic

Hunger continues to rise amid the pandemic, including among college students with low incomes. States can reduce food insecurity for hundreds of thousands of students nationwide by implementing key federal exemptions, as in Massachusetts and Pennsylvania, and fully implementing temporary federal COVID-19 relief policies.

In addition to taking up these options, this report recommends that federal policymakers permanently remove the SNAP work for food barriers. As this report goes to print, members of Congress recently filed legislation that would remove the work for food rules and improve SNAP access for students, including H.R. 1919, the **Enhanced Access to SNAP Act (EATS) Act**. Until federal legislation is enacted, states can continue innovating. With creative policy solutions, states can ensure all students with low incomes can access nutrition assistance.