



Assessing the Impact of Proposed College Student SNAP Policies

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Executive Summary

Millions of today's college students struggle to pay for their education while also meeting their basic needs. More than 3.9 million undergraduate college students face food insecurity today, at twice the rate of all U.S. households, disproportionately impacting student parents, students of color, and first-generation college students.¹ Students with unmet basic needs face enormous challenges pursuing and successfully completing a postsecondary degree. The Supplemental Nutrition Assistance Program (SNAP) can provide relief in the form of cash assistance to buy food – and for many students, this represents hundreds of dollars each month. Yet as many as two million students who are potentially eligible and at risk of food insecurity are not enrolled in the program.²

College students face unique barriers to accessing this critical benefit due to SNAP eligibility rules that are difficult to understand, navigate, and verify. Students who are enrolled more than half-time must meet one of ten “exemptions,” or special rules, on top of all the regular income, citizenship, and household eligibility criteria in order to be eligible to apply for SNAP. The exemptions, which add another layer of verification to an already burdensome application, can be subject to change (number of work hours) and difficult to verify (lack of child care). Not only does this translate into added burden for the applicant, it also increases the administrative complexity and workload, and the potential for inconsistent determinations. As a result, low-income college students face far more difficulty than the general population in accessing SNAP.

Advocates, policymakers, national higher education associations, and institutions of higher education have shown increasing support for reforming student eligibility rules to make the benefit simpler to understand and access.^{3,4} The upcoming Farm Bill reauthorization poses a unique opportunity to simplify SNAP eligibility for students and institutions, to reduce administrative burden on institutions and SNAP administrators, and to ensure eligibility for students most likely to experience food insecurity and with insufficient access to family income or wealth. In recent years, several policy proposals have been put forth that either introduce new exemptions or remove the need for students enrolled half-time or more to meet any exemption at all.

This report examines the extent to which proposed options included in the Student Food Security Act, Let Students Eat proposal, and the EATS Act impact specific demographics of students, either by increasing access or by streamlining the process for qualifying students to demonstrate eligibility. Using data from the 2020 National Postsecondary Student Aid Study (NPSAS), our findings indicate that introducing exemptions for students with a \$0 Expected Family Contribution (EFC) or between 0 and -1,500 for Student Aid Index (SAI), an independent student financial aid status, and who receive another means-tested benefit would:

- **Meaningfully increase access** for students of color, first-generation college-going students, LGBTQIA+ students, and students experiencing homelessness or food insecurity.
- **Help streamline the process** by which currently eligible students access SNAP, making it easier to administer and understand.

¹ McKibben, B., Wu, J., and Abelson, S. (2023). *New Federal Data Confirm that College Students Face Significant—and Unacceptable—Basic Needs Insecurity*. The Hope Center. <https://hope.temple.edu/npsas>

² U.S. Government Accountability Office. (2018). *Food insecurity: Better information could help eligible college students access federal food assistance benefits*. (GAO Publication No. 19–95) Washington, D.C. <https://www.gao.gov/products/gao-18-371sp>

³ American Council on Education (2023). *Letter Ag Committee Food Insecurity*. <https://www.acenet.edu/Documents/Letter-Ag-Committees-Food-Insecurity-052523.pdf>.

⁴ Warren, E., Sanders, B., Padilla, A. et al. (2022). *Letter to USDA re SNAP Eligibility*. <https://www.warren.senate.gov/imo/media/doc/2022.03.01%20Letter%20to%20USDA%20re%20SNAP%20Eligibility.pdf>

Background

Today, attaining a college degree or skills credential is as important as ever to expand career opportunities, secure higher lifetime incomes, and lay the pathway to economic mobility. Yet less than 40 percent of all college students — and only one in three students at two-year institutions — complete their degrees.⁵ Meanwhile, by 2031, almost three-quarters of jobs in the United States will require postsecondary education.⁶ Many factors impede a student’s ability to enroll and graduate, but among the biggest hurdles are financial stress and affordability.⁷

Today’s College Students

In addition, the demographics of college students are changing — many have young children or aging parents to care for, are students of color, are working to support themselves and their families, or are the first in their families to go to college. Each year, millions of students face unique stressors as they juggle responsibilities at home and at school, struggling to pay for their education and afford basic needs such as food, childcare, housing, and healthcare. A postsecondary degree provides individuals the opportunity to pursue the education and training necessary to change their socioeconomic trajectory, ultimately enabling them to be more productive contributors to the workforce. Unfortunately, barriers outside of the classroom, including access to food, can impede a student’s ability to stay enrolled and complete their degree.

Too many of today’s students must make difficult choices between spending on their basic needs and other living expenses or covering tuition and textbooks.

Multiple studies have shown that about a third of college students face food insecurity,^{8,9,10} more than double the national average of 12.8 percent among the general population.¹¹ Food insecurity primarily impacts parenting and first-generation college-going students. In addition, it disproportionately impacts students of color, Pell Grant recipients, and those with disabilities.¹² Data also demonstrates rates of food insecurity are higher at

“The reality is that I skip meals, often I don’t eat lunch. I don’t want to get lunch here on campus because it’s too expensive. I get headaches, have trouble concentrating. I also have a disability that is worse if I don’t eat.”

- Student Surveyed by GAO

⁵ Hanson, M. (2023). *College Graduation Statistics*. EducationData.org. <https://educationdata.org/number-of-college-graduates>

⁶ Carnevale, A., Smith, N., Van Der Werf, M., and Quinn, M. (2023). *After Everything: Projections of Jobs, Education, and Training Requirements through 2031*. Washington, DC: Georgetown University Center on Education and the Workforce. <https://cew.georgetown.edu/cew-reports/projections2031/>

⁷ Fletcher, C., Cornett, A., Webster, J., and Ashton, B. (2023). Student Financial Wellness Survey report: Fall 2022 semester results. Trellis Company. https://www.trelliscompany.org/wp-content/uploads/2023/05/SFWS-Aggregate-Report_FALL-2022.pdf

⁸ Nazmi, A., Martinez, S., Byrd, A., Robinson, D., Bianco, S., Maguire, J., Crutchfield, R., Condrón, K., & Ritchie, L. (2019) *A systematic review of food insecurity among US students in higher education*. Journal of Hunger & Environmental Nutrition. DOI: [10.1080/19320248.2018.1484316](https://doi.org/10.1080/19320248.2018.1484316)

⁹ U.S. Government Accountability Office. (2018). *Food insecurity: Better information could help eligible college students access federal food assistance benefits*. (GAO Publication No. 19–95) Washington, D.C. <https://www.gao.gov/products/gao-18-371sp>

¹⁰ McKibben, B., Wu, J., and Abelson, S. (2023). *New Federal Data Confirm that College Students Face Significant—and Unacceptable—Basic Needs Insecurity*. The Hope Center. <https://hope.temple.edu/npsas>

¹¹ Rabbitt, M.P., Hales, L.J., Burke, M.P., & Coleman-Jensen, A. (2023). *Household Food Security in the United States in 2022* (Report No. ERR-325), U.S. Department of Agriculture, Economic Research Service. <https://doi.org/10.32747/2023.8134351.ers>

¹² U.S. Government Accountability Office. (2018). *Food insecurity: Better information could help eligible college students access federal food assistance benefits*. (GAO Publication No. 19–95) Washington, D.C. <https://www.gao.gov/products/gao-18-371sp>

community colleges than at four-year institutions, and higher at Historically Black Colleges and Universities (HBCUs) and Tribal Colleges and Universities.¹³

Qualifying For SNAP

College students facing food insecurity struggle to access SNAP, even if they are eligible. While the federal government provides subsidies for low-income individuals to purchase food through SNAP, current rules governing student eligibility are complicated for students to navigate and for agencies to implement. There is widespread agreement that complex student SNAP rules are overly burdensome and inhibit eligible students from accessing the benefit. The U.S. Government Accountability Office (GAO) estimates that just 43 percent of potentially eligible college students who meet SNAP income limits reported receiving benefits, a much lower share than the 78 percent participation rate among all eligible people in the U.S.,¹⁴ and that at least 2 million college students were eligible for but not participating in SNAP.

For a student to qualify for SNAP, they must first meet all the regular income and asset limits and citizenship or residency requirements. If a student receives the majority of their meals through a meal plan, they are ineligible for SNAP. If the student attends an institution of higher education half-time or more, they must also meet at least one of the following requirements, or “exemptions:”¹⁵

- Are under age 18 or are age 50 or older
- Have a physical or mental disability
- Work at least 20 hours a week in paid employment
- Participate in a state or federally financed work study program
- Participate in an on-the-job training program
- Care for a child under the age of six
- Care for a child aged six to 11 and lack the necessary childcare to attend school and work 20 hours a week or participate in work study
- Are a single parent enrolled full-time in college and taking care of a child under 12
- Receive Temporary Assistance for Needy Families (TANF)
- Are assigned to, placed in, or self-placed in a college or other institution of higher education through a federal, state, or local employment and training program

SNAP Verification

To demonstrate that one meets an exemption, students are often required to provide proof or verification. Demonstrating student exemptions adds complexity to an already burdensome process of providing the verifications normally required. Some exemptions greatly vary within a SNAP certification period. For instance, the number of hours worked can change from week to week, particularly for students, due to the time of year, school breaks, availability of shifts, or volatility in gig economy work. Other changes have little effect on a family’s

¹³ McKibben, B., Wu, J., and Abelson, S. (2023). *New Federal Data Confirm that College Students Face Significant—and Unacceptable—Basic Needs Insecurity*. The Hope Center. <https://hope.temple.edu/npsas>

¹⁴ Cunnyngham, Karen (2023). *Reaching Those in Need: Estimates of USDA’s State Supplemental Nutrition Assistance Program (SNAP) Participation Rates in 2020*. Prepared by Mathematica, Contract No. 12-3198-20-F-0056 Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Kameron Burt. Available online at: www.fns.usda.gov/research-and-analysis

¹⁵ “Students” (2023). U.S. Department of Agriculture. <https://www.fns.usda.gov/snap/students>

financial situation, like a child turning age six or 12, yet trigger different eligibility requirements for student parents – an issue not faced by non-students.

In addition, sometimes it is difficult to determine what counts as exemption proof. For instance, the ambiguity as to what counts as sufficient evidence for proving lack of access to sufficient childcare or single-parent status can be a barrier to applying and enrolling for student parents. This can lead to varied caseworker interpretations of proof and therefore varied eligibility determination. When considering policy options to improve access to SNAP for college students, the focus is often on increasing the number and percentage of those who qualify. However, it is equally important to consider the burden of proof related to those levers. Exemptions that are objective and already verified using other forms of accessible information can be as impactful as the number of people served by them.

Addressing Today's College Students Through SNAP Policy

During the COVID-19 pandemic, Congress sought to improve access by temporarily expanding the student SNAP exemptions to include those with an Expected Family Contribution (EFC)¹⁶ of \$0 and those deemed eligible for work study programs (whether or not they were participating) as determined by their Free Application for Federal Student Aid (FAFSA). The \$0 EFC exemption resulted in 3 million students becoming temporarily eligible until the expansion ended on July 1, 2023.¹⁷ The temporary expansion, along with growing evidence about college student hunger, has created new and sustained momentum among higher education leaders to permanently reform student SNAP eligibility. Numerous organizations, including the Hope Center and the American Council on Education, have urged Congress to sustain or increase exemptions, along with streamlining methods for students to provide verifications.^{18,19}

The upcoming Farm Bill reauthorization poses a unique window to consider policies that better reach college students facing food insecurity and streamline SNAP enrollment for students and administering agencies. Generally renewed every five years, the 2018 Farm Bill was slated for reauthorization in 2023 and was extended by Congress by one year as of January 2024. Several proposals have been put forth to streamline access for college students in recent years.²⁰ This report focuses on three proposals and uses recent NPSAS data to analyze which students may most benefit from the SNAP eligibility provisions outlined in each one. Each proposal requires students to meet all regular income, asset, and citizenship requirements though they differ in other eligibility criteria.

¹⁶ Expected Family Contribution (EFC) is a calculation made by Federal Student Aid based on data submitted by a student on the Free Application for Student Aid (FAFSA). A \$0 EFC indicates this student does not have sufficient income nor economic assets to contribute to the cost of their higher education. The 2024-25 FAFSA incorporates a new needs analysis formula. The calculation and term Expected Family Contribution (EFC) will be replaced with the Student Aid Index (SAI) which will include -\$1500 and up. The government projects that more students will be eligible for a Pell Grant under the SAI formula, and more students will be eligible for a Maximum Pell Grant. Therefore, a negative or \$0 SAI can be conceptually adopted in place of \$0 EFC.

¹⁷ Granville, P. (2021). *Congress Made 3 Million College Students Newly Eligible for SNAP Food Aid. Here's what Must Come Next*. The Century Foundation. <https://tcf.org/content/commentary/congress-made-3-million-college-students-newly-eligible-snap-food-aid-heres-must-come-next/>

¹⁸ American Council on Education (2023). *Letter Ag Committee Food Insecurity*. <https://www.acenet.edu/Documents/Letter-Ag-Committees-Food-Insecurity-052523.pdf>

¹⁹ The Hope Center (2023). *Coalition Letter to Congress on Students and SNAP*. <https://hope.temple.edu/policy-advocacy/coalition-letter-congress-food-insecurity-among-college-students>

²⁰ Though other policy recommendations have been proposed, the author aimed to focus on proposals that have garnered the most attention or are similar to other prominent bills.

1. **Student Food Security (SFS) Act of 2021**: The SFS Act would restore some of the COVID-19 era²¹ exemptions, including:
 - \$0 Expected Family Contribution (EFC)
 - Work study eligibilityIn addition, it would include:
 - Exemption for maximum Pell Grant receipt
 - Exemption for students who are Independent as defined by the FAFSA
 - Amendment to the work exemption by lowering it from 20 hours per week to 10 hours per week

2. **Let Students Eat Proposal**: This proposal recommends restoring the exemption for students with a \$0 EFC as well as the following new exemptions, including:
 - Students with any dependent under 18 years old
 - Students enrolled in other means-tested benefits beyond TANF, such as Supplemental Security Income (SSI), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), or Medicaid
 - Students who are Independent as defined by the FAFSA²²

3. **Enhanced Access to SNAP (EATS) Act of 2023**: The EATS Act would expand eligibility to all students enrolled in college half-time or more – provided they meet the regular SNAP criteria – effectively removing the need for any existing student exemptions. It also expands eligibility to students who have a meal plan that provides more than half their meals.

This report aims to inform consideration of potential changes in the upcoming Farm Bill through four levels of analyses: 1. Examination of qualification rate by student demographics under current law, 2. Examination of qualification rate by proposal, 3. Examination of qualification rate by student demographic by individual exemption option, and 4. Examination of the enrollment streamlining impact by individual exemption option.

²¹ Temporary exemptions were included as a part of the Coronavirus Response and Relief Supplemental Appropriations Act of 2021 (CRRSSAA).

²² Disclaimer: Benefits Data Trust is a member of the Let Students Eat Coalition and co-developed this proposal.

Methodology

Data Source

The analysis was conducted using the 2019–20 National Postsecondary Student Aid Study, Undergraduate (NPSAS:UG) by the National Center for Education Statistics (NCES). NPSAS:UG is a nationally representative study that observes survey responses of 80,800 students enrolled in a Title IV college from July 1, 2019 to June 30, 2020. The study, released in July 2023, provides the most recent national data available for this type of examination.

Methods

The population of students who are required to meet an exemption in order to be eligible for SNAP was determined using the following populations from the full NPSAS:UG dataset:

- Students who are U.S. citizens (proxy for length of stay or residency in the U.S.)
- Students with an income below 130 percent of the Federal Poverty Line (FPL) (the federal income limit for SNAP²³)
- Students enrolled half time or more as determined by their institution
- Students living off-campus (proxy for students likely not to be participating in a meal plan)²⁴

In summary, this report defines “students required to meet a SNAP exemption” as those who are enrolled half-time or more and meet regular SNAP income, household, and citizenship requirements.

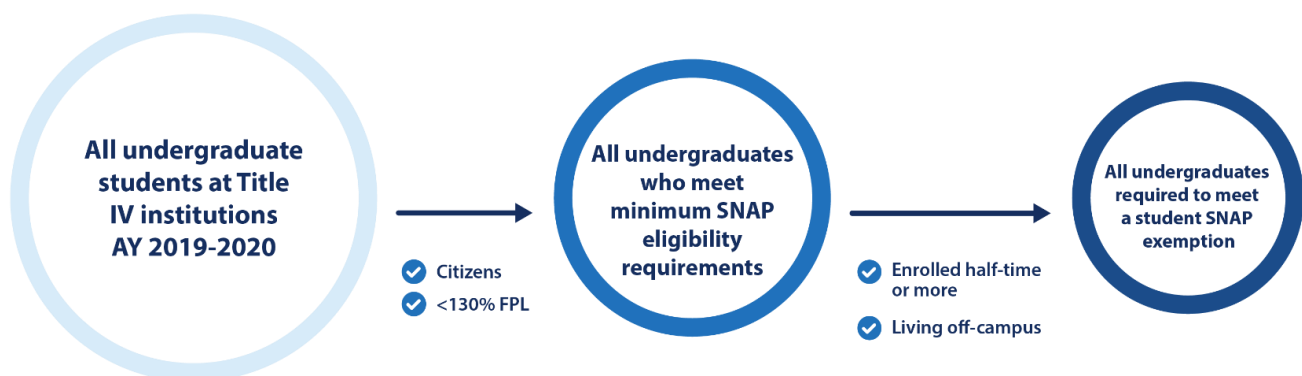


Figure 1. Visualization of how the population of study was determined using NPSAS(UG) data

²³ Note: Many states allow for higher income thresholds through Broad-Based Categorical Eligibility (BBCE). Additionally, the income data source in NPSAS:UG is derived from the FAFSA, representing family income for dependent students and student income for independent students, representative of several years prior to the survey.

²⁴ To remove students who are on a meal plan and therefore ineligible for SNAP, only students living off campus were included as a proxy to students who are likely not to have a meal plan. NPSAS:UG released a variable for students with meal plans, but this was released after analysis was completed. Initial comparisons did not demonstrate a significant discrepancy between those without a meal plan and students who live off campus.

Of those who meet all four criteria, the percentage of students who meet at least one student SNAP exemption under current law was determined and analyzed by the demographic characteristics listed below. NPSAS:UG variables were selected that best match the exemptions under current law. Table 1 in the Appendix describes assumptions made in matching NPSAS:UG variables to current law exemptions and their limitations.

- Race
- Ethnicity
- Homelessness status
- Food security level
- Military background
- First-generation college-going status
- Age
- Parenting status
- Employment status
- Type of institution attended (two or four year, public or private, HBCU)
- Sexual orientation²⁵

Next, the proportion of unique students who would qualify for SNAP under the SFS Act, Let Students Eat proposal, and EATS Act by meeting at least one exemption under each proposal was determined. These analyses identified the total change in the number of students who qualify and did not include a demographic breakdown by proposal.

Then, the individual exemptions in those proposals were analyzed by demographics. Again, variables were selected that best match the proposed exemption. Two proposed exemptions were not included as a part of this analysis: 1) students with federal or state work-study eligibility and 2) students who receive the maximum Pell Grant amount. These analyses were excluded due to lack of or insufficient information in the NPSAS:UG dataset. For further information, see Appendix. Table 2 in the Appendix describes assumptions and limitations of chosen variables for proposed exemptions.

Finally, individual exemption options were examined in relation to the method of verification that could be used and its potential to streamline the verification process. Data sources were identified that provide easily identifiable proof for students, colleges, and SNAP administrators.

²⁵ The NPSAS:UG survey provided student respondents options of heterosexual, bisexual, homosexual, another sexual orientation, or don't know. This analysis looked at the impact on students who are bisexual, homosexual, or another sexual orientation. The author recognizes these are some but not all identities that are a part of the LGBTQIA+ community, a community of students who disproportionately face food insecurity.

Findings

Who is Eligible Under Current SNAP Exemptions?

This section examines the demographic breakdown of the population of undergraduate students who must meet an exemption to qualify for SNAP (those off-campus, enrolled half-time or more, and meet SNAP income, household, and citizenship requirements). Among this group (Appendix: Table 3):

- More than a quarter are of Hispanic or Latino origin.
- More than a quarter are parents, of whom more than half have at least one child under 6 years old.
- 1 in 10 experience homelessness, and 1 in 3 experience low or very low food security.
- 42 percent are first-generation students.

Next, the proportion of undergraduate students required to meet a student SNAP exemption who do meet at least one was determined. About 75 percent of students required to meet an exemption do meet a current exemption, such as by working 20 hours a week or more, caring for a dependent under age 6, or participating in a work-study job (Figure 2). However, the share of students who meet a current exemption varies by demographic. Fifty-nine percent of Asian students required to meet a SNAP exemption currently qualify, while at least 75 percent of students of all other races currently qualify. About 9 in 10 student parents qualify for SNAP, as do 9 in 10 working students. Finally, about 4 in 5 students experiencing homelessness and students experiencing food insecurity qualify for SNAP under current law (Appendix: Table 4).

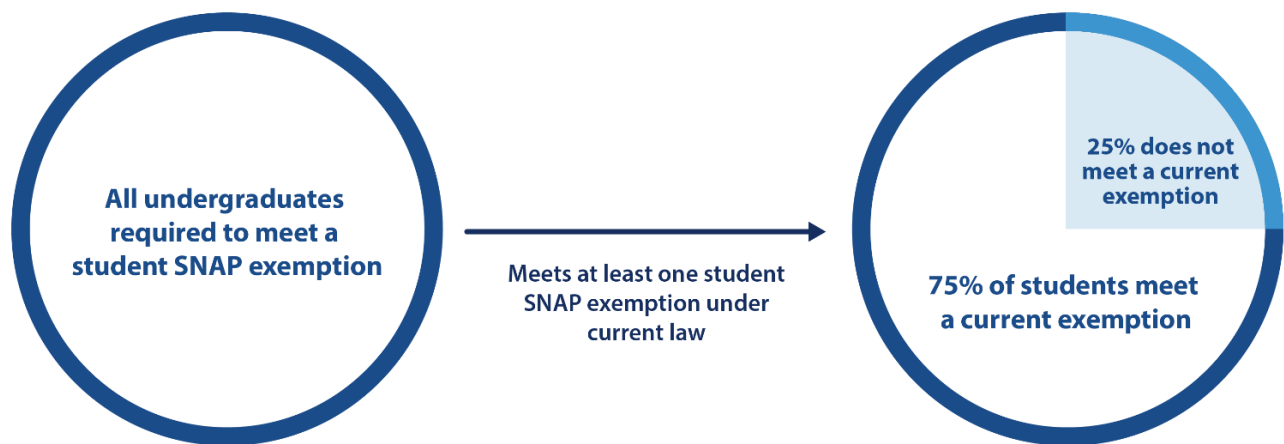


Figure 2. Estimated percentage of students required to meet a SNAP exemption who do meet a current exemption

How Does Each Proposal Impact Student SNAP Eligibility?

The SFS Act, Let Students Eat proposal, and EATS Act each expands the share of students who qualify for SNAP above the 75 percent of students who currently meet an exemption (See Figure 3):

- SFS Act: Ninety-seven percent of students who currently must meet an exemption would meet at least one current or new exemption. Twenty-two percent more students would become eligible than under current law.
- Let Students Eat Proposal: Ninety-eight percent of students who must meet an exemption would meet at least one current or new exemption. Twenty-three percent more students would become eligible than under current law.

- EATS Act: One hundred percent of students who are currently required to meet a SNAP exemption would qualify, and the total student population eligible for SNAP would expand by an additional 12 percent. The EATS Act expands the share of qualifying students past the population who currently meet SNAP income, household, and citizenship requirements because it removes the exclusion of low-income students who receive most of their meals through a meal plan.

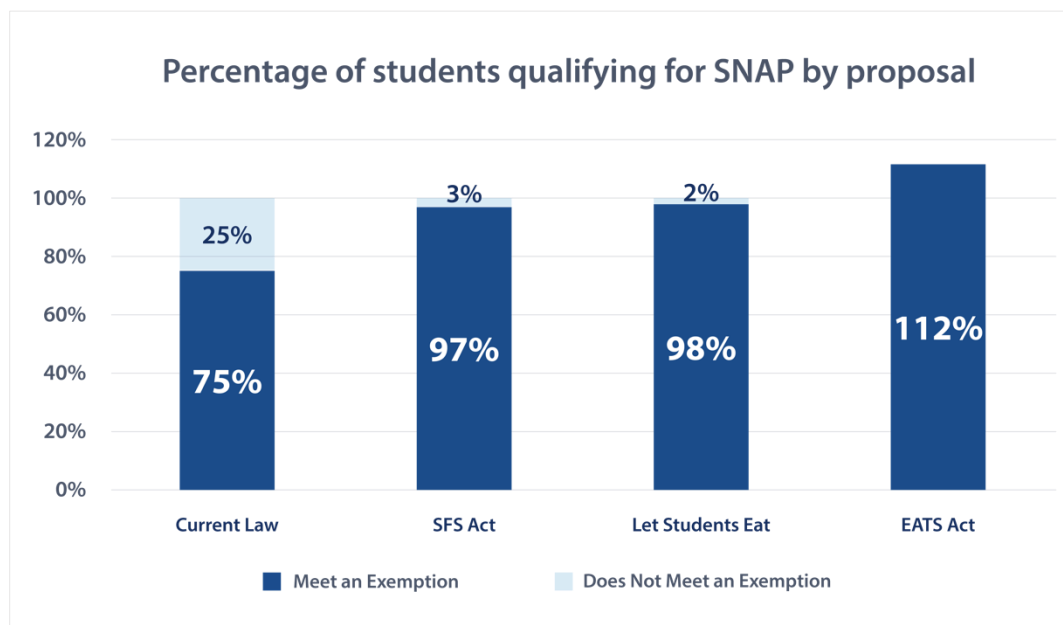


Figure 3. Comparison of percentage of students qualifying for SNAP by proposals compared to current law

Given that this analysis focuses on students who meet SNAP income and citizenship requirements, these findings suggest that all three proposals have the potential to expand SNAP access to a greater population of students with demonstrated need.

How Does Each Exemption Impact Student SNAP Eligibility by Demographic?

This section examines the impact of individual exemptions within the three proposals on specific student demographics. The student populations who would be most impacted by these proposed exemptions are described below. For a complete breakdown by exemption, see Figures 6-8 in the Appendix. The impact of each proposal on specific student demographics is not included due to data and capacity limitations. Given that all three proposals expand eligibility to almost all SNAP income-eligible students required to meet an exemption, it is likely that disparities across student demographics by proposal are minimal.

SFS Act and Let Students Eat Proposal Exemptions

The impacts of the following exemptions on student demographic groups that correspond with high risk of food insecurity were examined:

- \$0 Expected Family Contribution (EFC)
- Defined as Independent on the FAFSA
- Work at least 10 hours a week
- Receive other means-tested benefits

- Have a dependent under the age of 18

These exemptions are proposed in the SFS Act and/or Let Students Eat proposal.

\$0 EFC

If \$0 EFC were re-introduced as a permanent exemption in addition to current law exemptions, the percentage of income-eligible students who would qualify for SNAP would increase from 75 percent to 92 percent. While this exemption would increase the percentage of students qualifying across all demographic categories, some of the most greatly impacted students would be first-generation students and students attending HBCUs (18 percent and 19 percent respectively.)

Across race and ethnicity, Asian students with low incomes would be most significantly impacted, with an increase of 27 percent. Hispanic, Native Hawaiian/other Pacific Islander, and Black students would also see substantial increases in their likelihood to qualify by 20 percent, 19 percent, and 18 percent, respectively. This suggests that the implementation of a \$0 EFC policy could increase the diversity of low-income students who would qualify for SNAP.

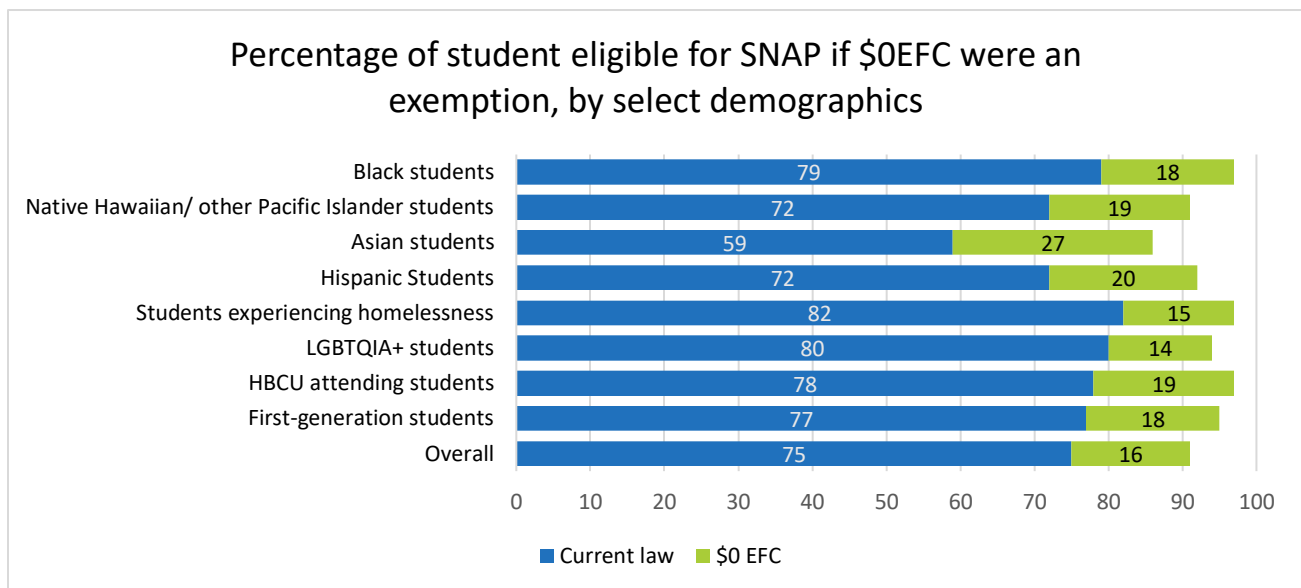


Figure 4. Of undergraduate students required to meet a SNAP exemption, the percentage of students eligible for SNAP under current law compared to the percentage point increase of students who would be eligible if \$0 EFC were an exemption, by select demographics

Independent Undergraduate Students

If independent financial aid status was introduced as an exemption, the percentage of SNAP-qualifying students would increase from 75 percent to 87 percent. This exemption increases the percentage of students qualifying across most demographic categories, most notably for students with a military background. Across race and ethnicity, Asian students again would be most significantly impacted with 18 percent more qualifying than under current law.

Working 10+ hours per week

If the work exemption was lowered from 20 hours a week to 10 hours a week, the percentage of SNAP-qualifying students overall would increase from 75 percent to 81 percent. Across race and ethnicity, Asian students would again be most significantly impacted with almost 11 percent more qualifying than under current law. Students attending a public institution and students with a military background would see the next largest percentage increase of note at about 5 percent each.

Receiving another means-tested benefit

If receipt of another means-tested benefit, such as WIC, free or reduced-priced lunch, or Supplemental Security Income, were introduced as an exemption in addition to current law exemptions (which only includes receipt of TANF), the percentage of SNAP-qualifying students would increase from 75 percent to 90 percent. This exemption would qualify at least 10 percent more first-generation college-going students, students of color, LGBTQIA+ students, and students experiencing homelessness or food insecurity. About 86 percent of income-eligible Asian students would qualify, 27 percent more than under current law.

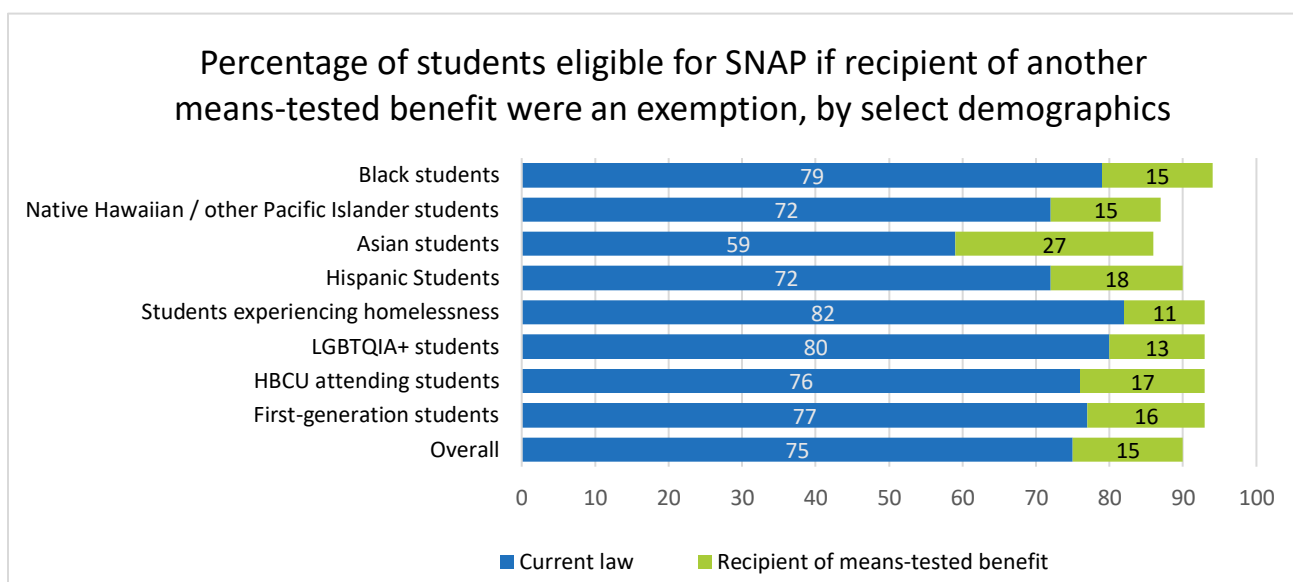


Figure 5. Of undergraduate students required to meet a SNAP exemption, the percentage of students eligible for SNAP under current law compared to the percentage point increase of students who would be eligible if being a recipient of another means-tested benefit were an exemption, by select demographics

Dependents under 18

There were negligible differences in the types of students who would qualify for SNAP if the current exemptions for dependents and caregiving were expanded to include any dependent under the age of 18. Over 90 percent of student parents required to meet an exemption already likely qualify for SNAP under current law.

In summary, these findings suggest that introducing exemptions for \$0 EFC, Independent student status, and receipt of additional means-tested benefits would meaningfully enable more of the most vulnerable students to access SNAP benefits. Additionally, while expanding the age of dependents would not meaningfully increase access for parenting students given the high percentage of those who already likely qualify, it would streamline the process by aligning student parent eligibility with non-student eligibility rules and simplifying the process for students whose children age in and out of the current brackets.

EATS Act

The impact of removing exemptions for any student who is enrolled half-time or more, regardless of having a meal plan or not, and meets other SNAP requirements would make students across all demographics qualify at increased rates. The most substantial increases would be for students attending an HBCU, more than doubling the number of students eligible. Across race and ethnicity, 56 percent more income-eligible Asian students would qualify, and between 27-37 percent more students of all other races.

What Are the Opportunities to Streamline Enrollment Under the Proposed Student Exemptions?

Students applying for SNAP who indicate they meet an exemption must demonstrate evidence as such in their application. According to the GAO, only 43 percent of eligible college students are enrolled in SNAP, suggesting significant opportunity to reduce barriers to enrollment and verification among those already eligible. Many of the proposed exemptions provide promising pathways for already eligible students to enroll that are simplified and streamlined.

If information that validates whether a student meets an exemption is readily available from a verified source, this can ease the application process for both students and SNAP administrators. Some of the proposed exemptions could help a significant share of students who already qualify for SNAP under current law more easily self-identify as potentially eligible. These exemptions can also simplify verification because it is information that is

available from the FAFSA. The following table demonstrates that verifiable information exists on the FAFSA for \$0 EFC and Independent student status. Information regarding the receipt of any federal benefit is self-reported on the FAFSA, but also verifiable through data sharing with human services organizations.

Key Finding

75% of students already eligible for SNAP have a \$0 EFC, which can be verified on the FAFSA. This and other proposed exemptions provide promising pathways for already eligible students to have streamlined enrollment in SNAP.

Table 5. Proposed Student SNAP Exemptions that are applicable to currently eligible students and are verifiable through the FAFSA.

Proposed Student SNAP Exemption	Percentage of currently eligible students who meet the proposed exemption	Data available on the FAFSA?
\$0 EFC	75%	Yes (Student Aid Index) ²⁶
Independent Students	67%	Yes
Working 10+ Hours a Week	73%	No

²⁶ The 2024-25 FAFSA incorporates a new needs analysis formula. The calculation and term Expected Family Contribution (EFC) will be replaced with the Student Aid Index (SAI) which will include -\$1500 and up. The government projects that more students will be eligible for a Pell Grant under the SAI formula, and more students will be eligible for a Maximum Pell Grant. Therefore, a negative or \$0 SAI can be conceptually adopted in place of \$0 EFC.

Proposed Student SNAP Exemption	Percentage of currently eligible students who meet the proposed exemption	Data available on the FAFSA?
Receiving Any Federal Benefit	68%	Yes (self-reported) ²⁷
Dependent Under 18	31%	No (Dependent's Age n/a)

²⁷ Benefits available for self-reporting on the FAFSA: Earned income credit (EIC); Federal housing assistance; Free or reduced-price school lunch; Medicaid Refundable credit for coverage under a qualified health plan (QHP); Supplemental Nutrition Assistance Program (SNAP); Supplemental Security Income (SSI); Temporary Assistance for Needy Families (TANF); Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).

Conclusion

Food insecurity remains a significant barrier to millions of college students across the country. This is particularly so for traditionally underrepresented populations in higher education, such as first-generation students, students from low-income backgrounds, students of color, and students juggling the demands of childcare. SNAP can help these students access up to hundreds of dollars each month to pay for groceries, yet it remains difficult to access due to complicated requirements that obscure eligibility and impede verification and enrollment. There is considerable momentum to reform SNAP eligibility to make it easier to access for students who need it most.

This analysis indicates that 75 percent of undergraduate students required to meet a SNAP exemption could do so. However, the GAO estimates that only 43 percent of these that meet the current eligibility criteria are enrolled. This abysmal uptake rate (much lower than the general population at 78 percent) signifies that there is a low probability for a low-income college student to apply for or receive SNAP despite their eligibility. This is not surprising given the confusing nature of the exemptions and the complex methods for demonstrating them. Continuing to use exemptions that are variable to change and difficult to prove decreases the likelihood of students applying in the first place, plus makes determining their eligibility – when they do apply – challenging. With current exemptions only applicable to three-quarters of low-income students, and even fewer enrolling, examining the SNAP exemptions is critical to determine their utility to decrease student hunger.

Among the examined policy proposals, EATS Act shows the greatest increase in eligibility, and all three examined proposals uplift students with need who don't have access to SNAP. All three proposals expand access to additional low-income students, either through the addition of new student exemption options or elimination of exemptions. All three proposals demonstrate opportunities to streamline how a student's eligibility is verified, thus reducing barriers to the enrollment process, either by including new exemptions that apply to already eligible students and are easily verifiable, or through the elimination of exemptions that require verification. Under the Student Food Security Act, the Let Students Eat proposal, and the EATS Act, 22 percent, 23 percent, and 37 percent more students would become eligible, respectively.

This report demonstrates that simplifying or reducing exemptions to be objective, steady, and more easily verifiable could increase the percentage of low-income students able to access SNAP while reducing applicant and caseworker burden. In addition, revised or eliminated exemptions would increase the eligibility and potential enrollment of populations historically underrepresented in higher education and/or those at risk of food insecurity. Based on this report's findings, the potential impact of proposed exemptions are as follows:

Introducing \$0 Expected Family Contribution, or its Student Aid Index equivalent, shows significant promise for streamlining and increasing access for underrepresented students. Introducing \$0 EFC would increase access to 92 percent of students who are required to meet a SNAP exemption and meet SNAP income and citizenship requirements. Of these students, Asian students would see the most meaningful increase, with Black and Hispanic students close behind. Additionally, introducing \$0 EFC would ease the pathway to SNAP for 75 percent of students who already meet an existing exemption and meet income and citizenship requirements.

Introducing Independent financial aid status and receipt of means-tested benefits as exemptions would have a tangible impact, increasing access to 91 percent and 87 percent of students required to meet an exemption and meeting regular program requirements, respectively. As with \$0 EFC, these new exemptions would meaningfully increase access for Asian, Black, and Hispanic students, as well as those attending an HBCU. Additionally, an exemption for receipt of means-tested benefits would meaningfully increase access for first-generation college-going students, LGBTQIA+ students, and students experiencing homelessness or food insecurity.

Low-income Asian students would see the greatest lift in eligibility across proposed exemptions. Finally, the significant increases in the share of eligible Asian students who qualify under all proposed exemptions suggest that this population is disproportionately excluded by exemptions under current law. Any of these proposed exemptions would meaningfully improve Asian students' access to this critical benefit.

Introducing \$0 EFC, Independent financial aid status, and receipt of means-tested benefits would help simplify the process by which students access SNAP. Introducing these exemptions would help qualify a significant share of students who already qualify for SNAP under current law by meeting another existing exemption, creating multiple pathways for students to self-identify and qualify. Importantly, these three options can be verified by the FAFSA, data that is accessible to students, institutions, and state agencies. These options offer multiple opportunities to streamline access. Students, who are often familiar with their EFC, Independent status, or receipt of other benefits, could more easily self-identify as potentially eligible for SNAP. Institutions would more easily be able to identify likely eligible students, notify them, and verify eligibility for administering agencies. Finally, state higher education and health and human services agencies would have opportunities to engage in interagency data sharing to streamline SNAP screening and enrollment for students who meet these new exemptions.²⁸

This report offers additional insights on student SNAP reform options for consideration in the upcoming Farm Bill reauthorization. With the complexity of various SNAP exemptions that confuse students, institutions, and agencies alike, this analysis sheds light on which proposed exemptions most efficiently and effectively help to identify and verify the students most in need of food assistance.

Too many of today's students are forced to make difficult choices between their basic needs like food or covering tuition and textbooks. Offering new and/or simplified pathways will make eligibility criteria clearer and more understandable for students most likely to experience food insecurity, while making it easier for states and schools to verify eligibility, administer the benefit, and outreach to students.

Supporting low-income college students with sufficient access to food is a strategic support to help them achieve a degree or credential at a time when postsecondary education is needed more than ever to succeed in the labor market. Our nation can make a significant difference in helping more today's students from low-income backgrounds persist in graduating and earning a degree to create upward mobility for them and their families.

²⁸ See BDT's Data Sharing Playbook for more information on data sharing authority and opportunities: [https://bdtrust.org/bolstering-benefits-access-introducing-benefits-data-trust%E2%80%99s-new-data-sharing-playbook/?page=1&filters=\[%22playbookToolkit%22\]](https://bdtrust.org/bolstering-benefits-access-introducing-benefits-data-trust%E2%80%99s-new-data-sharing-playbook/?page=1&filters=[%22playbookToolkit%22])

Appendix

Table 1. Variables used from NPSAS:UG to determine student SNAP eligibility under current law.

Current law exemptions ²⁹	Limitations or assumptions of chosen NPSAS:UG variable
Under Age 18 or age 50 or over	None
Have a physical or mental disability	Disability exists on a spectrum, and student’s disability status as described in NPSAS may not correlate to disability status for SNAP determination purposes. Disability status in NPSAS:UG is determined by survey response to serious long-lasting conditions such as difficulty hearing, blindness or difficulty seeing, difficulty concentrating, or difficult walking or climbing stairs. ³⁰ Having a disability as an exemption for eligibility is determined by the SNAP state agency.
Work at least 20 hours a week in paid employment	Excludes work-study jobs, as those students would already be eligible under the work-study exemption.
Participate in a state or federally financed work-study program	Only observed participation in a federal work-study program.
Participate in an on-the-job training program	Students meeting this exemption were not included in the analysis as no parallel variable in the dataset was determined.
Care for a child under the age of 6	None
Care for a child age 6 to 11 and lack the necessary childcare enabling the individual to attend school and work 20 hours/week or participate in work study	Variables indicating access to childcare and age of dependent(s) used, but not able to determine whether childcare enabled the student to work with existing variables. Note: childcare exemption was simplified to any child under 12 for demographic analysis.
Are a single parent enrolled full-time in college and taking care of a child under 12	Note: parent marital status was simplified to any child under 12 for demographic analysis.
Receive Temporary Assistance for Needy Families (TANF) assistance	Variable used indicates if student’s family received TANF as self-reported on their FAFSA, but not necessarily that the student is receiving TANF.

²⁹ “Students” (2023). U.S. Department of Agriculture. <https://www.fns.usda.gov/snap/students>

³⁰ “National Center for Education Statistics PowerStats.” (2024). *National Postsecondary Student Aid Study: 2020 Undergraduate Students*. <https://nces.ed.gov/datalab/codebooks/by-subject/157-national-postsecondary-student-aid-study-2020-undergraduate-students>

Current law exemptions ²⁹	Limitations or assumptions of chosen NPSAS:UG variable
Enrolled in certain programs aimed at employment, including TANF work programs, Workforce Innovation and Opportunity Act Title I programs, and others	Students meeting this exemption were not included in the analysis as no parallel variable in the dataset was determined.

Table 2. Variables used from NPSAS:UG to determine student SNAP eligibility for proposed exemptions.

Proposed exemption	Limitations or assumptions of chosen NPSAS:UG variable
\$0 Expected Family Contribution	Only applies to students who completed a FAFSA.
Maximum Pell Grant Recipient	Eligible Pell Grant recipients receive a maximum dollar amount that depends on their course intensity and consistency, such as if they are half- or full-time, and if they enroll in summer courses in addition to other semesters or terms. This level of variation in amounts and timing makes it too uncertain to determine how many students under this proposed exemption would become eligible by demographic, and therefore was not included in this analysis.
Care for a child under the age of 18	Due to analysis limitations, determining the impact of this proposed exemption was compared to students with dependent children under 12, regardless of their access to childcare or marital status. This simplification underestimates the impact of this proposed exemption because it assumes more student parents are currently eligible than are, but by a small margin, compared to the number of student parents who would be newly eligible.
Work-study eligible	This proposed exemption was not included in this analysis as no comparable variable was determined. Work-study eligibility is institution dependent, making one student eligible at one institution but ineligible at another.
Students who are enrolled in another means-tested benefit or who have an immediate family member enrolled in another means-tested benefit	Variable is if their family received SNAP, NSLP, SSI, TANF, or WIC as indicated on the FAFSA, not necessarily that the individual student is receiving those benefits. This variable does not include enrollment in Medicaid.
Independent student	Students in NPSAS are classified as independent using FAFSA data, or in absence of FAFSA data, other characteristics reported to determine dependency status.

Proposed exemption	Limitations or assumptions of chosen NPSAS:UG variable
Work at least 10 hours a week in paid employment	Excludes work-study jobs, as those students would already be eligible under current law.

Table 3. Demographic breakdown of undergraduate students who are subject to the SNAP student exemptions

Undergraduate students required to meet an exemption		
Race	White	57%
	Black	21%
	Asian	7%
	American Indian or Alaska Native	3%
	Native Hawaiian / other Pacific Islander	2%
	More than one race	11%
Ethnicity	Hispanic	28%
Parenting status	Parenting students	28%
Employment Status	Students with paid employment (excluding work-study)	64%
Homeless Status	Students who experienced homelessness in the last 30 days	11%
Military Background	Students with a military background	5%
Institution Type	Two-year	41%
	Public	73%
	HBCU	1%
First-Generation	First-Generation students	42%
Age	24-39	43%
Food Security Status	low or very low food security	32%

Undergraduate students required to meet an exemption

Sexual Orientation	Lesbian, Gay, Bisexual, Another sexual orientation	13%
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Table 4. Percentage of students who currently meet a SNAP exemption under current law by demographic

Undergraduate students who currently meet an exemption

Overall		75%
Race	White	77%
	Black	79%
	Asian	58%
	American Indian or Alaska Native	84%
	Native Hawaiian / other Pacific Islander	72%
	More than one race	78%
Ethnicity	Hispanic	73%
Parenting status	Parenting students	>90%
Employment Status	Students with paid employment (excluding work-study)	90%
Homeless Status	Students who experienced homelessness in the last 30 days	82%
Military Background	Students with a military background	78%
Institution Type	Two-year	78%
	Public	75%
	HBCU	78%
First-Generation	First-Generation students	77%
Age	24-39	81%
Food Security Status	low or very low food security	81%

Undergraduate students who currently meet an exemption

Sexual Orientation

Lesbian, Gay, Bisexual, Another sexual orientation

80%

Percentage Increase of SNAP-Eligible Students by Exemption: Race and Ethnicity

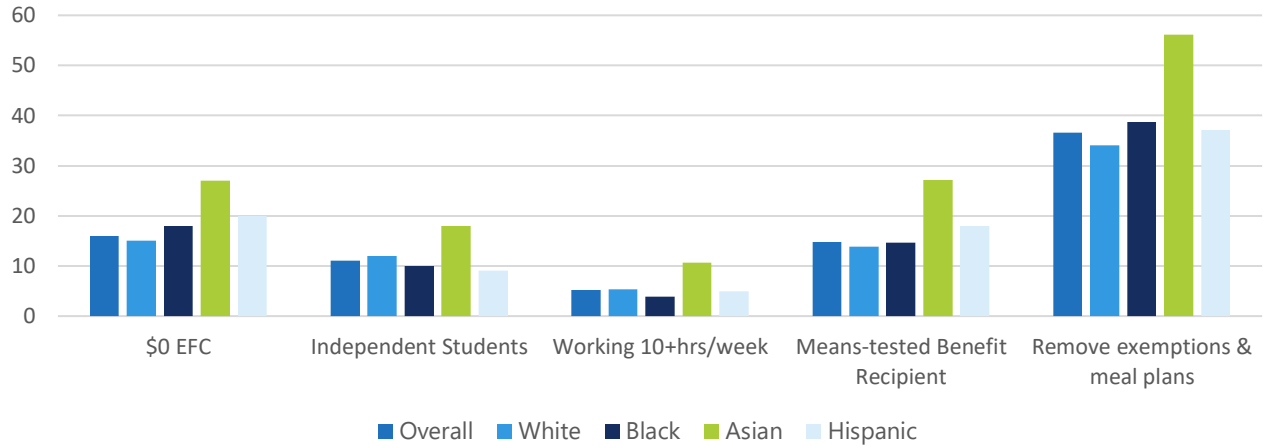


Figure 6. Estimate of Percentage Increase of SNAP-eligible Students by Exemption: Race and Ethnicity

Percentage Increase of SNAP-Eligible Students by Exemption: Institution Type

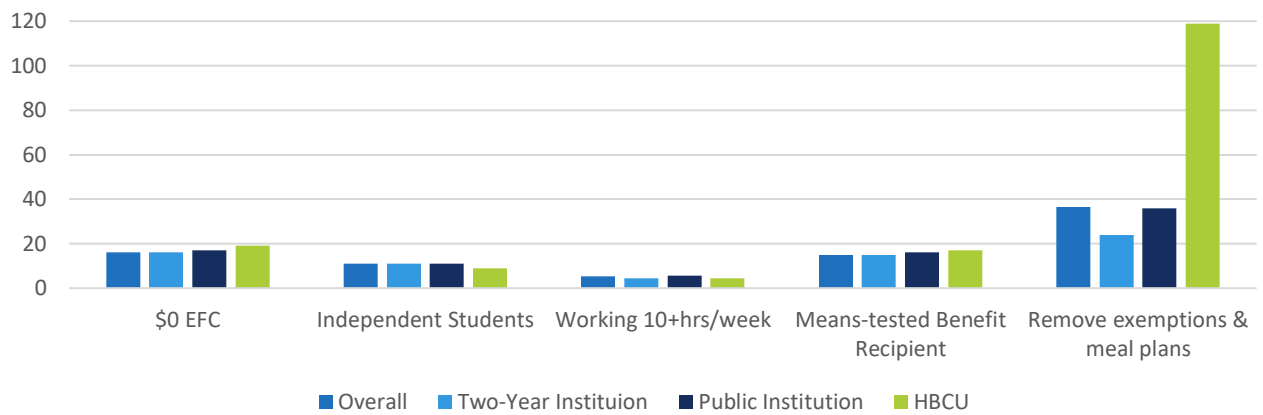


Figure 7. Estimate of Percentage Increase of SNAP-Eligible Students by Exemption: Institution Type

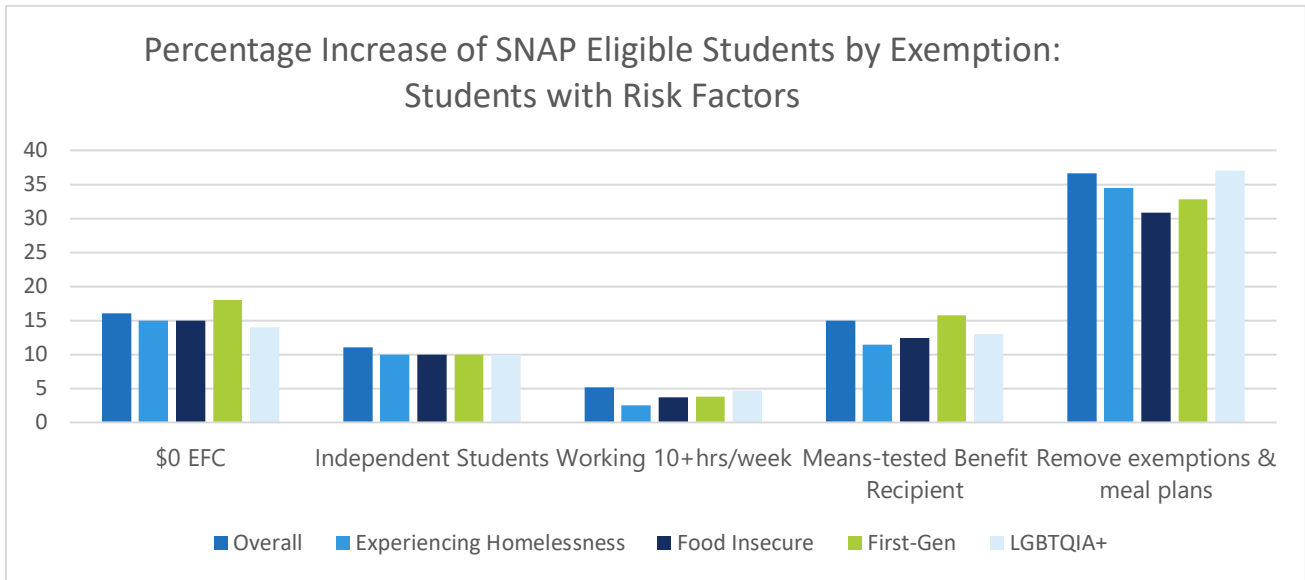


Figure 8. Estimate of Percentage Increase of SNAP-eligible Students by Exemption: Students with Risk Factors

Additional Discussion of Work-study Eligibility and Maximum Pell-Grant Recipients as Proposed Exemptions

Work-study eligibility is variable and complex. A student’s eligibility and receipt of such aid depends on the student’s institution attended and its cost of attendance. For example, a student who completes the FAFSA might receive work-study at one college with a high cost of attendance, but not receive work-study at a lower cost institution. Because Federal work-study eligibility determination and awarding is done at an institution level and not at the federal level, students who would meet this proposed exemption was not able to be included. This same reasoning makes implementing this proposed exemption to determine a student’s eligibility for SNAP challenging, as work-study eligibility is highly variable per context for each student, and not easily verified.

Secondly, eligible Pell Grant recipients receive a maximum dollar amount that depends on their course intensity and consistency, such as if they are half- or full-time, and if they enroll in summer courses in addition to other semesters or terms. This level of variation in amounts and timing makes it too uncertain to determine how many students under this proposed exemption would become eligible for SNAP. However, this analysis found that 92 percent of students who are required to meet an exemption would become eligible for SNAP if \$0 EFC became an exemption. By definition, all students who have \$0 EFC also receive the maximum Pell Grant, and therefore assumes that *at least* 92 percent of students would be eligible for SNAP under a maximum Pell Grant exemption. Like work-study eligibility, the high variation in potential max Pell Grant amounts and timing of receiving max Pell Grants during the academic year, make using max Pell Grant award a difficult exemption to verify if implemented.

Suggested citation

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