

TO: Massachusetts Community College, State College and University SPOCS and Interested Stakeholders

FR: Pat Baker, Senior Policy Advocate

CC: Katy Abel, MA Dept of Higher Education; Brittany Mangini, MA Dept of Transitional Assistance

DT: January 21, 2021

RE: New & improved student access to SNAP nutrition benefits during COVID

Recent news confirms that Massachusetts has experienced the highest increase in food insecurity in the nation due to COVID,ⁱ and that our lowest income households are struggling.

As many of you know, federal rules for the Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps) have long restricted certain college students from access to the program's benefits unless students are working part-time, getting paid in a work study job or meeting other narrow SNAP student restrictions. In the past 10 years, Massachusetts implemented two state options to enroll more students in SNAP including a) community colleges students who will be more employable with a degree and b) students who receive MassGrant financial aid. But we also know that many college students are still not accessing SNAP, and thousands are studying remotely during COVID and not accessing campus food resources.

In response to the COVID-19 pandemic, in December 2020 Congress authorized new flexibilities in SNAP law that open up access to the program for many previously excluded students.ⁱⁱ This includes all students who either:

- (a) are "eligible to participate in a State or federally-financed work study program during the regular school year as determined by the institution of higher education," or
- (b) "in the current academic year, have an expected family contribution of \$0 as determined in accordance with part F of title IV of the Higher Education Act of 19[6]5 (20 U.S.C. 1087kk et. seq.)."ⁱⁱⁱ

These rules will remain in effect until 30-days after the current national public health emergency declaration is lifted. As of the date of this memo, Massachusetts and sister states are waiting to receive USDA guidance to begin implementation of these provisions and notify SNAP staff, so this may be a few more weeks before official implementation.

It is important to note that, under the Families First Corona Virus Response Act (March 2020), **all SNAP households qualify for the maximum SNAP benefit monthly amount** - for as long as both a state and federal public health declaration are in effect. What this means that 1-person household (for example, a student not living with a spouse or a parent if under age 22) may qualify for \$234/month; a 2-person household for \$430/month and so on. Students must also meet US citizenship or immigration status, household composition and other financial eligibility rules. Attached is a chart that lists the maximum monthly SNAP benefits currently in effect, and some of the added benefits of SNAP.

College and university administrators and staff now have key roles to play to ensure that students are aware of the benefits for which they are newly eligible, and that those students have the information they need to access those benefits. For Massachusetts Community Colleges, where many students are already likely SNAP-eligible by virtue of their enrollment in an certificate or associates degree program, these changes are a new opportunity to reach out to students who have not yet taken up the benefits. The same is true for 2 and 4-year college students who qualify for SNAP because they receive MassGrant.

Massachusetts's colleges and universities should act now to make sure that students can take advantage of these flexibilities on day one. Please reach out to your financial aid office and ask them to partner with you to ensure that students know that they may qualify for SNAP. **Helping students save money on food could in turn help institutions retain students.**

Actions that financial aid offices can take:

- 1) Make sure that students' EFC and work study eligibility are easy to access and prominently located on existing online financial aid portals.** Most students never check the FAFSA site once they've completed their applications because they misplace their pin. Ensuring that students can easily access information on EFC and work study eligibility can help students more successfully apply for SNAP on their own.^{iv} The Department of Transitional Assistance (DTA) online SNAP application through the [DTAConnect portal](#) is a straightforward online application that most students should be able to self-navigate. *At minimum, all institutions should act now to ensure that students can access the information they need to demonstrate their exemption from SNAP's student exclusions.*
- 2) Once USDA guidance is released and DTA issues guidance to SNAP workers, proactively contact students whose financial aid files indicate either a \$0 expected family contribution (EFC) or eligibility for work study to inform them of their new potential SNAP eligibility.**
 - Students may be unaware of their EFC—or of where to find that information, may have strained or no relationships with their parents to ask for information, may not have ready access to proof of their eligibility for work study, and may not know about these changes to SNAP eligibility.
 - Students believe they need to have an on campus work study job to qualify for SNAP, even though many campuses are closed or have reduced campus hours. The new federal rule requires only that they are “eligible to participate” in work study, students are not required to have wages from a work study job.
 - Further, students may be unaware that receipt of MassGrant (a policy the state implemented in August of 2017) also potentially qualifies them for SNAP.

Proactive outreach from trusted sources at students' own institutions can help to address these gaps by supplying students with the information they need, both about their own aid status and about food assistance available through SNAP, along with information about how to apply for SNAP benefits. Campuses with a benefits access coordinator (for example, a Single Stop, Thrive or SPOC office) should include contact information for that coordinator in relevant communications with students.

- 3) **Train student financial aid staff on these new changes to SNAP eligibility.** Well-informed financial aid officers can help students understand their potential SNAP eligibility. *Important note: Student financial aid officers should be clear that they are not responsible for determining a student's eligibility for SNAP; instead, their role is to help their students access information they need to verify their potential eligibility to the Department Transitional Assistance (DTA).*
- 4) **Include information about SNAP in student financial aid award letters.** These exemptions from SNAP's regular student eligibility rules, which are tied to the national Covid-19 Public Health Emergency, may extend for some time. This may give colleges and universities an opportunity to inform students about SNAP in the context of information about their overall financial aid package, a communication that they are likely to read closely. This may be an important opportunity to reach out again to students whose financial aid files indicate they may be eligible for the program.

Actions that other campus staff can take:

- 1) **Advertise the availability of SNAP widely to the campus community, emphasizing new expansions in SNAP eligibility for college and university students,** as well as the long term policies for community college and MassGrant students. Public information campaigns, outside of direct outreach from financial aid offices, can amplify the work of financial aid professionals and reduce stigma that students may associate with SNAP.
- 2) **Coordinate with student organizations to publicize SNAP eligibility through familiar channels.** Peer-to-peer messaging about SNAP benefits will be particularly impactful.

SNAP has long been America's first line of defense against hunger. Congress's recent action to open SNAP more broadly to the nation's college and university students corrects an important oversight in the nation's pandemic response. It is our hope that Massachusetts's colleges and universities will be national leaders in ensuring that this aid will get to the students who need it.

ⁱ Boston Globe, November 5, 2020 [Study: A million people in Mass. don't have enough food. The state has the highest percentage increase of residents facing hunger in the country.](#)

ⁱⁱ "Consolidated Appropriations Act, 2021," Pub. L. No. 116–260 (2020), Sec. 702(e), <https://www.congress.gov/bill/116th-congress/house-bill/133/text/enr>.

ⁱⁱⁱ The general federal student exclusion from SNAP does not apply to college students enrolled less than half-time. A student's EFC is calculated from the information supplied on their FAFSA.

^{iv} A number of MA college financial aid staff and SPOCs (single points of contact) have confirmed that while the EFC information is available to the colleges, students generally do not access the EFC information through the FAFSA portal because the EFC information is difficult to find, students do not regularly use the FAFSA portal and/or may have lost or forgotten their log in information or not be in communication with parents. Conversely, students are more likely to use their college financial aid online portals and consult financial aid award letters.