

Memorandum

To: Randy Gardner, Chancellor, Ohio Department of Higher Education
Bruce Johnson, President, Inter-University Council of Ohio
Jack Hershey, President & CEO, Ohio Association of Community Colleges
C. Todd Jones, President & General Counsel, Association of Independent Colleges and Universities of Ohio
Andrea Morrow, President, Ohio Association of Student Financial Aid Administrators
Dr. Kristina M. Johnson, President, The Ohio State University System
Dr. M. Duane Nellis, President, Ohio University System
Dr. Neville G. Pinto, President, University of Cincinnati System
Dr. Todd Diacon, President, Kent State University System
Dr. Gary Miller, President, University of Akron System
Dr. Alex Johnson, President, Cuyahoga Community College System
Dr. Gregory Postel, President, University of Toledo System
Dr. Jeff Bauer, President, Shawnee State University
Dr. Jack Thomas, President, Central State University
Dr. Susan Edwards, President, Wright State University
Jim Tressel, President, Youngstown State University
Harlan Sands, President, Cleveland State University

From: Hope Lane, Policy Associate, The Center for Community Solutions
Joree Novotny, Director of External Affairs, Ohio Association of Foodbanks
Lisa Hamler-Fugitt, Executive Director, Ohio Association of Foodbanks
Tara Britton, Policy Director, The Center for Community Solutions
Rachel Cahill, Rachel Cahill Consulting

CC: Kimberly Henderson, Director, Ohio Department of Jobs and Family Services
Joel Potts, Executive Director, Ohio Jobs and Family Services Directors' Association
Members of the Ohio General Assembly

Date: February 10, 2021

Re: Increasing college student retention during the COVID-19 pandemic through SNAP access

A survey conducted by the Hope Center for College, Community and Justice at Temple University at the beginning of the pandemic concluded that nearly 3 in 5 students were experiencing basic needs insecurity, and food insecurity affected 44 percent of students at two-year institutions and 38 percent of

students at four-year institutions.¹ We know that even prior to the pandemic, financial strain and college affordability are among the primary reasons people don't pursue higher education and can prevent many current students from finishing. Although many campuses, such as Columbus State Community College and Cleveland State University have created student [food pantries](#) in the past few years as the issue of food insecurity has become more prominent, Supplemental Nutrition Assistance Program (SNAP) benefits are what has prevented many Ohioans from facing low food security during the pandemic.

Until now, many college students have been barred from accessing SNAP benefits as a way to prevent "traditional students," those attending full-time and receiving financial support from their parents, from qualifying for the program because of their low income while in school. This paradigm is far from universal, however, as only about two-thirds of high school graduates enroll in college immediately after high school and few have a financial safety net.² Over 7.5 million college students are 25 years old and over³ and more than one in five college students are parents.⁴ The rise in accommodations such as night and online courses as well as increased access to community colleges means more students are entering higher education with unique situations.

Recently, Congress authorized new flexibilities in SNAP law that grant access to the program for many students who were previously excluded.⁵ These changes remove SNAP's presumptive bar on student eligibility for students enrolled more than half-time and 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," (previously students had to be actively **participating** in work study to qualify) 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.)."⁶

¹ Sara Goldrick-Rab et al., "#RealCollege During the Pandemic: New Evidence on Basic Needs Insecurity and Student Well-Being" (Philadelphia, PA: Temple University, June 15, 2020), <https://hope4college.com/realcollege-during-the-pandemic/>.

² <https://nces.ed.gov/fastfacts/display.asp?id=51#:~:text=Question%3A,in%20college%20in%20October%202018.>

³ <https://nces.ed.gov/fastfacts/display.asp?id=372>

⁴ [https://iwpr.org/iwpr-issues/student-parent-success-initiative/parents-in-college-by-the-numbers/#:~:text=Today's%20Student%20Parent%20Population&text=%5B1%5D%20Of%20the%203.8%20million,are%20fathers%20\(Figure%201\).](https://iwpr.org/iwpr-issues/student-parent-success-initiative/parents-in-college-by-the-numbers/#:~:text=Today's%20Student%20Parent%20Population&text=%5B1%5D%20Of%20the%203.8%20million,are%20fathers%20(Figure%201).)

⁵ "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>.

⁶ 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.

These rules will remain in effect until 30-days after the current federal public health emergency declaration is lifted. Please note guidance from the United States Department of Agriculture's (USDA) Food and Nutrition Service (FNS) to begin implementation is attached.

It is also important to note that, under the Families First Coronavirus 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. This means that a one-person household (e.g. a student not living with a spouse or parents, if under age 22) may qualify for \$234/month; a two-person household for \$430/month, a three-person for \$616/month and so on.⁷ Students must also meet SNAP's U.S. citizenship or immigration status rules and other financial eligibility rules.

College, university administrators and financial aid officers 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 Ohio's Community and Technical Colleges, where many students were already exempt from SNAP's student rules by virtue of their enrollment in a qualifying program⁸, these changes are a new opportunity to reach out to students who may have already been eligible for SNAP benefits before these changes, but who have not yet taken up the program. Because of the confusion around eligibility and perceived stigma around SNAP, only 4 in 10 students who were already eligible for SNAP were actually enrolled in the program.⁹

Ohio's colleges and universities should act now to make sure that students can take advantage of these flexibilities as soon as possible. Campus financial aid offices have a particularly important role to play in these efforts. This memo provides recommendations for key steps that Ohio's colleges and universities can take to help students use these new SNAP flexibilities to help meet their basic needs as the pandemic continues.

Actions that financial aid offices can take:

- 1) Make sure that students' expected family contribution (EFC) and work study eligibility are easy to access and prominently located on existing online financial aid portals.** Ensuring that students can easily access these key pieces of information can help students more successfully apply for SNAP on their own. 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.

⁷ "SNAP – Temporary Increase in Maximum Allotments due to COVID-19," accessed January 15, 2021, https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP%20Temp%20Increase%20in%20Max%20Allotments%20COVID_12.28.20.pdf.

⁸ <https://www.fns.usda.gov/snap/students>

⁹ Parker Gilkesson, "Frequently Asked Questions About SNAP and Students" (The Center for Law and Social Policy), <https://www.clasp.org/publications/report/brief/frequently-asked-questions-about-snap-and-students>

- 2) **Proactively contact students whose financial aid files indicate either a \$0 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 not have ready access to proof of their eligibility for work study, and may not know about these changes to SNAP eligibility. 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 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. *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 students access information they need for county departments to verify the student's potential eligibility.*
- 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.
- 5) **Assure students returning for the 2021-2022 academic year fill out their FAFSA sooner rather than later.** While USDA guidance indicates the EFC on the FAFSA must be for this academic year, the new academic year begins on July 1, 2021. Encouraging students and their families to submit their FAFSA prior to June 30 can help to ensure continuous eligibility for SNAP benefits.

Actions that Colleges and Universities can take:

- 1) **Advertise the availability of SNAP widely to the campus community, including what it is and how and where to use it, emphasizing new expansions in SNAP eligibility for college and university 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.** Messages informing students of how SNAP benefits can help them may be particularly effective coming from peers and through peer networks.
- 3) **Assess student basic needs security on campus.** Institutions can conduct their own assessments of basic needs security using in-house resources and existing, validated measures, or can partner with outside organizations, such as Temple University's Hope Center, to assess basic needs

security. Basic needs assessments can be the start of a deeper engagement with students on campus about the challenges they face, and the institutional solutions that may help them overcome those challenges.

- 4) Assure satellite/branch/regional campuses are disseminating the same information.** Satellite college campuses are rare opportunities for large institutions to offer educational and economic opportunities in underserved areas of a community. It's crucial that these students as well as online students can access the same information regarding SNAP and other services as the students on the main campus.
- 5) Seek approval for SNAP benefits to be accepted at on-campus grocery or markets.** For students without their own transportation and/or who live on campus the easiest access to food is right on campus. Many campuses offer small snack hubs featuring soup, coffee and grab and go items and even larger marketplaces where students can purchase fresh produce and pantry staples. In some cases, like Ohio University's Jefferson Marketplace, the location's proximity to the perimeter of campus makes a connection with the off-campus population as well.
- 6) Utilize established and trusted student food pantries and programs for advertising the availability of SNAP and help to screen individuals for eligibility.** Many universities, such as Columbus State Community College and Kent State University partner with local foodbanks to develop a robust program to feed an increasing number of hungry students. Often, students themselves work the pantries and in turn are trusted by students and community members to serve as on-the-ground leaders in combatting food insecurity. For this reason, advertising SNAP availability at the pantries and providing brief training to employees on eligibility can help to get the word out on the new flexibilities to those who need it most.

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 Ohio's colleges and universities will be national leaders in ensuring that this aid will get to the students who need it.