

# RESEARCH BRIEF



## Food Fuels Futures: Expanded SNAP Eligibility Reduces Hunger Among College Students

### Introduction

**M**illions of college students nationwide rely on the Supplemental Nutrition Assistance Program (SNAP) as a critical resource for accessing food to fuel their health and learning. While SNAP is an essential resource for college students, SNAP’s eligibility rules for college students are incredibly complex. Under the current SNAP rules — in addition to meeting income limits and other eligibility criteria — students (defined as those attending an institution of higher education more than half-time) must also meet one of several requirements, known as “exemptions,” to be eligible for SNAP.<sup>1,2</sup> Student eligibility rules create and exacerbate inequities, as college students with low incomes face higher burdens pursuing their education while applying and maintaining eligibility for SNAP as compared to their counterparts who do not need SNAP.



One of these rules, known as the “work-to-eat rule,” requires students who do not meet another SNAP eligibility exemption to work a paid job or participate in work-study at least 20 hours per week or 80 hours per month — in addition to maintaining more than half-time coursework — to be deemed potentially eligible.<sup>3</sup> This rule places burdens on students struggling with food insecurity, as they require students to not only meet income limits and other requirements, but also document sufficient work hours to be eligible for SNAP. This creates inequities between college students who need food assistance and those who can participate in SNAP. Unsurprisingly, the Government Accountability Office found that, in 2016, only about 43 percent of the 3.3 million students potentially eligible for SNAP reported receiving benefits.<sup>4</sup>

In response to the COVID-19 pandemic, the U.S. Secretary of Health and Human Services declared and continually renewed the federal Public Health Emergency (PHE) declaration starting in March 2020. Congress and the Trump and Biden administrations authorized various adjustments in SNAP to address the massive economic and health crisis caused by the COVID-19 pandemic. In December 2020, during the PHE, Congress authorized two additional exemptions for college students, as well as other SNAP enhancements through the Consolidated Appropriations Act of 2021.<sup>5</sup> SNAP eligibility was expanded to college students with low incomes who were eligible for work-study or had an expected family contribution (EFC) of \$0 in the current academic year. These exemptions expired after the end of the PHE on July 1, 2023, meaning that students who met either of these criteria were no longer eligible for SNAP unless they satisfied another exemption or the work-to-eat rule.

<sup>1</sup> Students, 7 CFR 273.5(b)(5) (2024). [https://www.ecfr.gov/current/title-7/part-273/section-273.5#p-273.5\(b\)\(5\)](https://www.ecfr.gov/current/title-7/part-273/section-273.5#p-273.5(b)(5)).

<sup>2</sup> USDA Food and Nutrition Service (February 2023). *SNAP — Institutions of Higher Education and Student Eligibility Rules*. <https://www.fns.usda.gov/snap/ihe-student-eligibility-rules>.

<sup>3</sup> Ibid.

<sup>4</sup> US Government Accountability Office (2018). *Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits*. <https://www.gao.gov/products/gao-19-95>.

<sup>5</sup> Consolidated Appropriations Act, 2021, Pub. L. No. 116-260 (2020). <https://www.govinfo.gov/app/details/PLAW-116publ260>.

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This report — informed by interviews with college students — sets forth reasons why these expansions were so vital to college students during the PHE and why decision-makers should build on these lessons and eliminate the “work-to-eat rule” so that more college students can focus on learning rather than being distracted by hunger. Additionally, although the temporary expansions have ended, there is legislation, known as the Enhance Access to SNAP (EATS) Act, which would ensure all students with low incomes facing food insecurity could access SNAP.

## Food Insecurity Harms Millions of College Students

Food insecurity simultaneously undermines the mental and physical health of college students while having detrimental impacts on their academic performance and ability to complete their degree.<sup>6</sup> The USDA defines food insecurity as “household-level economic and social condition of limited or uncertain access to adequate food.”<sup>7</sup> A large body of research demonstrates that food insecurity is a significant problem among college students, especially students of color, students with low incomes, older students, and students who are parents.<sup>8</sup> According to the U.S. Analysis of the 2019–2020 National Postsecondary Student Aid Study (NSPAS: 20), more than 4 million college students faced food insecurity.<sup>9</sup>

College students interviewed by the Food Research & Action Center (FRAC) in the spring of 2023 shared how hunger harmed their mental and physical health, their ability to succeed in and outside of the classroom, and their ability to complete their degrees, for example:

*“I didn’t realize food affects my mood so much before. I would just [get] 2 to 3 hours of sleep ... and my grades [suffered]. Even though I studied, it didn’t help at all because I wasn’t understanding. But now, I’m eating and get what I’m doing in class.”*

## The Importance of SNAP for College Students

Research consistently demonstrates that SNAP improves the health, nutrition, and well-being of millions of households.<sup>10</sup> SNAP is crucial in supporting students in meeting their food needs. For instance, students shared with FRAC how grateful they were for SNAP and how it eased their worries and freed up money for other essential needs since some of their food expenses were covered:

*“I just have my income. I have no one else to depend on. [SNAP] helps a lot. Because [before I had SNAP], I only had the clothes that were in my bag. But now I can put [money] to the side, look nice and decent when I have to attend meetings or [do] presentations for my major. Because I have [SNAP], it saves me a good amount of money. I can buy food, and I don’t have to worry about [other needs].”*

*“Having [SNAP] has helped so much every single month. Because I don’t have to worry about my credit cards or my savings going towards [food], it’s honestly the best possible thing I could have as a student right now.”*

*“I appreciate [SNAP], and I know everyone else appreciates having that additional money. A lot of us don’t have to take [additional] loans on because [food] is covered through [SNAP]. I have to worry about managing my money. However, when it comes to food, that’s no longer something I have to worry about. I know that it’s covered, so it eases my anxiety so much every single month.”*

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<sup>6</sup> Food Research & Action Center (FRAC) (2018). *FRAC ResearchWire – Summer 2018*. Available at: <https://frac.org/wp-content/uploads/researchwire-summer-2018.pdf>.

<sup>7</sup> Rabbitt, M.P., Hales, L.J., Burke, M.P., & Coleman-Jensen, A. (2023). Statistical supplement to household food security in the United States in 2022 (Report No. AP-119). U.S. Department of Agriculture, Economic Research Service. <https://doi.org/10.32747/2023.8134352.ers>.

<sup>8</sup> Ibid.

<sup>9</sup> FRAC’s analysis of 2019-20 National Postsecondary Student Aid Study (NPSAS:20).

<sup>10</sup> Food Research & Action Center (FRAC) (2017). *Hunger and Health: The Role of the Supplemental Nutrition Assistance Program in Improving Health and Well-Being*. Available at: <https://frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf>.

SNAP is a federally funded program that is available in every community. The program can support students with low incomes when universities may not have the resources to meet students' needs. Additionally, because of its entitlement structure, SNAP can reach any eligible college student with a benefit that is 100 percent federally funded. This structure provides a unique opportunity to grow participation in the program as need grows, allowing the program to respond quickly and significantly in times of crisis. Overall, SNAP's structure allows it to be an effective, efficient, and flexible intervention for students experiencing food insecurity.



## Too Many College Students Miss Out on the Benefits of SNAP

Too many college students struggling against food insecurity face obstacles in accessing SNAP, including stigma, the complexity of the SNAP's eligibility rules for students, and a lack of information on how to apply for SNAP. Current SNAP rules are needlessly complex, creating additional barriers for students seeking SNAP. Several students interviewed by FRAC discussed challenges in understanding their eligibility, providing sufficient documentation of their work hours and earnings, and verifying their eligibility with state agency eligibility workers.

These barriers continue to exacerbate inequities for college students. For example, research demonstrates that first-generation college students, often coming from households with low incomes, face additional barriers to college completion.<sup>11</sup> Additionally, first-generation college students have been found to experience additional challenges with accessing support.<sup>12</sup> In interviews conducted by FRAC, several first-generation students shared similar experiences of not knowing where to start when interacting with public benefits and university systems because they had no one to guide them. The complexity of the SNAP rules for students only adds to these challenges.

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***“I found myself scrambling for food because, unfortunately, loans and grants can only take you so far, especially living in a rural area. Being first generation [college student] with no support or anyone to walk me through [the SNAP application], I found myself needing [support].”***

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Primary among these challenges is the “work-to-eat rule.” Students who would not have met any other exemptions must work 20 hours a week through a work-study program or other paid job to be eligible. The work-to-eat rule puts additional pressure on students to balance their class attendance, expected course load outside of class time (often twice the time the credit hours are listed as per federal regulation<sup>13</sup>) with paid work hours. Compiled with challenges accessing food and coping with food insecurity, this creates a situation that exacerbates stress and impacts students' ability to successfully complete college.

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<sup>11</sup> Pratt, I. S., Harwood, H. B., Cavazos, J. T., & Ditzfeld, C. P. (2019). Should I Stay or Should I Go? Retention in First-Generation College Students. *Journal of College Student Retention: Research, Theory & Practice*, 21(1), 105-118. <https://doi.org/10.1177/1521025117690868>.

<sup>12</sup> Chang, J., Wang, S.-w., Mancini, C., McGrath-Mahrer, B., & Orama de Jesus, S. (2020). The complexity of cultural mismatch in higher education: Norms affecting first-generation college students' coping and help-seeking behaviors. *Cultural Diversity and Ethnic Minority Psychology*, 26(3), 280–294. <https://doi.org/10.1037/cdp0000311>.

<sup>13</sup> “Credit hour”, Definitions, 34 CFR 600.2 (2024). [https://www.ecfr.gov/current/title-34/part-600/section-600.2#p-600.2\(Credit%20hour\)](https://www.ecfr.gov/current/title-34/part-600/section-600.2#p-600.2(Credit%20hour)).

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*“I had four part-time jobs ... still wasn’t enough [to sustain me].”*

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Some students interviewed discussed observing peers balance coursework with work hours and how that impacted their success in college.

*“School is like a full-time job. If you work too much [outside of that], it takes your attention away from school. But when you have competing needs of ... getting a degree versus having food on the table, you’re always going to choose food on the table.”*

## Pandemic-Era Flexibilities Were Critical in Supporting College Students



COVID-19 pandemic flexibilities created additional pathways for college students with low incomes to be eligible for SNAP. In addition to other exemptions, SNAP eligibility was expanded to college students with low incomes who:

- were eligible to participate in state or federally financed work-study during the regular academic year, as determined by the institution of higher education, or
- had an expected family contribution (EFC) of \$0 in the current academic year, including students eligible for a maximum Pell Grant.<sup>11</sup>

These expansions address the work-to-eat rule by reducing significant barriers for students seeking SNAP. For students interviewed by FRAC who received

SNAP with the PHE flexibilities, SNAP allowed them to attend class and successfully complete their coursework, labs, and internships without the stress of worrying about finding additional work and paying for food. While a student may qualify for placement in a state or federally funded work-study job, that does not mean they will find a job because more students seek work-study jobs than are available,<sup>14</sup> or work hours may be limited to less than 20 hours per week. These circumstances create barriers to accessing SNAP outside the student’s control. During the COVID-19 pandemic, students were losing work-study jobs.<sup>15</sup> By only requiring that a student qualify for a work-study program job ensured that SNAP served more students with low incomes, regardless of their work-study placement status.

Some students interviewed by FRAC communicated that they lacked financial support from their parents or guardians. One student stated, “My expected family contribution is \$0, and it’s always been \$0 since I started my college journey.” The “\$0 EFC” exemption created a pathway for students who may have otherwise not been eligible and who lacked familial financial support, a common experience for many college students who are from households with low incomes.

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<sup>14</sup> US Department of Education (2017). *8 Things You Should Know About Federal Work-Study*. <https://www.ed.gov/content/8-things-you-should-know-about-federal-work-study>.

<sup>15</sup> Krupnick, M. (2020). *Students who counted on work-study jobs now struggle to pay their bills*. The Washington Post. [https://www.washingtonpost.com/local/education/college-work-study-coronavirus/2020/10/21/e70c4f72-131d-11eb-ba42-ec6a580836ed\\_story.html](https://www.washingtonpost.com/local/education/college-work-study-coronavirus/2020/10/21/e70c4f72-131d-11eb-ba42-ec6a580836ed_story.html).

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Additionally, expanding student eligibility rules helped simplify the student rules and increased opportunities to connect more students with SNAP. The Department of Education (DOE), with the U.S. Department of Agriculture Food and Nutrition Service (USDA FNS), encouraged institutions of higher education to work with campus stakeholders to notify students of their potential eligibility.<sup>16</sup> The DOE also permitted the USDA to use the Free Application for Federal Student Aid (FAFSA) data to identify and communicate with students about potential eligibility.<sup>17</sup>

## Permanent Action Is Needed From Congress

While extremely critical in addressing food insecurity among college students with low incomes, these exemptions were only temporary. On May 11, 2023, the PHE expired. As of July 1, 2023, all college students who had received SNAP due to the PHE flexibilities, and do not meet another exemption, are no longer eligible for SNAP.

*“I have to be on [SNAP], but I know that [the end of the PHE] is coming up, and \$0 EFC [requirement] is being removed and just [qualifying for] work-study is being removed, and that’s causing so much anxiety.”*

*“I think [SNAP] is really beneficial to students. It makes me sad to hear that they’re going to get rid of [expanded eligibility] because that’s going to help a lot of students stay in school. That’s going to help a lot of students attain that degree, and become the first in their family to get a degree, or bring themselves and their families and their community up the social mobility ladder. It’s unfortunate.”*

Congress can end the complex student eligibility rules, including the work-to-eat rule, permanently, through the Enhance Access to SNAP Act. The EATS Act would no longer condition eligibility on participating in work-study, performing 20 hours of outside paid employment, or verifying another exemption.

## Conclusion

The pursuit and completion of higher education are crucial for an individual’s long-term economic success and well-being, which, in turn, contributes to gains for the individual’s household, community, and nation. Food insecurity among college students undermines this pursuit. SNAP flexibilities under the COVID-19 PHE positively impacted millions of college students nationwide.

SNAP remains a critical resource in ensuring college students have access to the food they need to keep hunger at bay and complete their education successfully. The EATS Act is a vital step to ensure that students can focus on their hunger for school rather than their hunger at school.

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<sup>16</sup> US Department of Education (2021). *Education Department Amplifies USDA Expansion of SNAP Benefits to Help Students Pursuing Postsecondary Education During Pandemic*. <https://www.ed.gov/news/press-releases/education-department-amplifies-usda-expansion-snap-benefits-help-students-pursuing-postsecondary-education-during-pandemic>.

<sup>17</sup> USDA Food and Nutrition Service (March 2021). *USDA Designation to Use FAFSA data*. <https://www.fns.usda.gov/snap/usda-designation-fafsa-data>.