

Policy Transmittal

Office of Self-Sufficiency Programs



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Self-Sufficiency Programs

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Number: SS-PT-19-014

Issue date: 08/15/2019

Topic: Food Benefits

Due date:

Subject SNAP Policy Changes for Students

Transmitting (check the box that best applies):

- ☐ New policy ☒ Policy change ☐ Policy clarification ☐ Executive letter
☐ Administrative Rule ☐ Manual update ☐ Other:

Applies to (check all that apply):

- | | |
|---|--|
| ☐ All DHS employees | ☐ County Mental Health Directors |
| ☒ Area Agencies on Aging: Types A and B | ☐ Health Services |
| ☒ Aging and People with Disabilities | ☐ Office of Developmental
Disabilities Services (ODDS) |
| ☒ Self Sufficiency Programs | ☐ ODDS Children's Intensive In
Home Services |
| ☐ County DD program managers | ☐ Stabilization and Crisis Unit (SACU) |
| ☐ ODDS Children's Residential Services | ☐ Other (please specify): |
| ☐ Child Welfare Programs | |

Policy/rule title:	Student Policy Change		
Policy/rule number(s):	461-135-0570	Release number:	
Effective date:	7/1/2019	Expiration date:	
References:			
Web address:			

DISCUSSION/INTERPRETATION:

Student hunger is a significant problem in Oregon's universities and community colleges. Hunger and food insecurity hinder academic achievement, worsens health outcomes, and threaten economic mobility. Our goal is to support every individual we serve on their path out of poverty, and education is an important component that leads to greater employment options with higher wages.

To support this commitment, several updates have been made allowing more students of higher education access to SNAP benefits. July 1, 2019 rule changes allowed for greater flexibility within the following eligible student criteria:

- Workforce Innovation and Opportunity Act (WIOA)
- Federal Work Study
- Meal Plans
- Expansion of eligible programs of study at institutions of higher education to include programs designed to be completed in not more than four years.

Outreach efforts are planned statewide at universities, colleges and student events to message these changes to students and inform faculty.

IMPLEMENTATION/TRANSITION INSTRUCTIONS:

Workforce Innovation and Opportunity Act (WIOA):

Previously in policy, only students of higher education placed in an approved WIOA program by a contractor were eligible for SNAP. Now, students of higher education who voluntarily place themselves in an approved WIOA program are also eligible under this criterion. To verify the student is enrolled in an approved school and program use the most updated WIOA list of approved training providers and programs at <https://www.wioainoregon.org/eligible-training-providers.html>.

Federal Work Study:

Federal work study (FWS) is a form of financial aid the student applies for and is awarded as part of the Free Application for Federal Student Aid (FAFSA) process. FWS provides funding for a student to work part-time on or off campus.

This was previously limited to students who could provide a start date and employment information. Now, a student who has applied for and been awarded FWS funds as part of their accepted financial aid offer may be eligible for SNAP so long as they **anticipate starting** a position in the school term. The student remains eligible under this criterion until the end of the school term, or if they refuse an assignment.

Example: When Francisco applied for Financial Aid, they requested work study as part of their financial aid package. Francisco is starting school in the fall and accepted FWS in addition to Pell grants and some loans. Francisco accepted the financial aid offer including work study and has started looking for positions to apply for. Francisco is eligible for SNAP based on the FWS student criteria.

Meal Plans:

Students with meal plans that provide for less than 51% of the meals may be eligible for SNAP.

Expansion of eligible programs of study:

Previously in policy SNAP eligibility was limited to Community College students and required the school to complete the form DHS 934, verifying that the student met eligibility criteria. A review of this process highlighted that the form created barriers in the application process. The DHS 934 is no longer needed and has been obsoleted in support of the following process.

Eligibility for this criterion will be determined by engaging in a meaningful conversation with the student of higher education about their education plan and how this course will connect them to jobs or a career.

- A student of higher education is eligible for the expanded criterion based on:
 - The student articulating a direct connection from education to employment and;
 - The educational component is intended to be completed in 4 years or less; students requiring additional time to complete program remain eligible.
 - This includes students taking additional time to complete a 4 year or less program
- A student of higher education would not be eligible under the E&T criterion;
 - If their employment plan requires a post-baccalaureate or graduate program; or
 - If they are currently enrolled in a post-baccalaureate or graduate program.

An important aspect of determining student eligibility is engaging the individual in a conversation about their career path and how their education is helping them reach their goal. If a student is not able to provide the link from education to employment, they would not be eligible for SNAP under this criterion.

Sometimes students are still trying to figure out which career path is right for them. Referring the student back to their school career center, advisory office or counselor is a great option for undecided individuals. These resources can be helpful for students to guide earlier decisions about education and employment goals.

Stay curious, taking the opportunity to listen free from judgement about the applicant's long-term goals. Education is one pathway out of poverty and each applicant chose this path for a reason that may be personal to them. By creating a safe and welcoming environment we allow individuals to share those reasons.

Here are some ways of starting this conversation to consider:

- I see that you are a University student, tell me about what you are going to school for?
- What are your plans after graduation?

Example 1 - Eligible:

Jordan, full-time student at the American College of Healthcare Sciences in the Master of Science of Aromatherapy program, is reapplying for SNAP benefits. While reviewing the most recent WIOA approved provider list it is discovered that Jordan meets WIOA criteria as both the school and program are listed. Eligibility is clearly narrated documenting the conversation with Jordan and the date the WIOA list of approved training providers was checked.

Example 2 – Eligible:

Bob is a full-time student at Mt Hood Community College. He applied for the nursing program but was not able to get in this year due to missing some pre-requisite classes. He is currently working on completing them and plans to reapply for the 2-year nursing program next year. He would like to be a geriatric nurse once he completes the program.

After reviewing all student criteria Bob is enrolled in a program meeting the student employment and training criterion. The eligibility determination was narrated to include Bob's employment goals after school. Bob will remain eligible even if it will take him longer than 4 years to complete due to pre-requisite requirements.

Example 3 – Eligible:

Sheila is a full-time student at Western Oregon University. She reports during the interview that she chose WOU because they had the best arts programs. The program usually takes 4 years, but she has been taking classes during summer breaks and is excited to become a motivational speaker with her own YouTube channel after graduation. She purchased a meal plan through WOU but states that it only provides for 1-2 meals a week.

Sheila is an eligible student because her meal plan provides for less than half of her meals. After reviewing all student eligibility criteria, she meets criterion under Employment and Training. The eligibility decision was clearly narrated including Sheila's employment plans after graduation and the conversation about her purchased meal plan.

Example 3 – Not Eligible:

Marco is a graduate student enrolled in a master's program. He applies for SNAP benefits but doesn't meet any of the student criteria for students of higher education. His program of study is not included in the expansion. He is not eligible for SNAP.

Example 4 – Not Eligible:

Rosa is an undergraduate student, currently undeclared and doesn't have a plan for work after graduation. Rosa is not eligible under the new expanded criteria.

Retroactive eligibility for students

Rules supporting these changes allow for retroactive eligibility when the following are met:

- The original filing date is 7/1/2019 or after; and
- The individual was denied for not meeting student eligibility criteria and is now eligible under these changes.

Local/branch action required: Share this information with staff who are responsible for determining eligibility for Self-Sufficiency Programs and take the above listed actions.

Central office action required:

Field/stakeholder review: ☐ Yes ☐ No

If yes, reviewed by:

Filing instructions:

If you have any questions about this policy, contact:

Contact(s): SNAP POLICY TEAM	
Phone:	Fax:
Email: SNAP.Policy@dhsosha.state.or.us	