



*Written Testimony before the Higher Education
and Employment Advancement Committee
Submitted by the Department of Social Services
March 2, 2021*

**H.B. 6229 - AN ACT ADDRESSING THE NEEDS OF FOOD-INSECURE STUDENTS
AT PUBLIC INSTITUTIONS OF HIGHER EDUCATION.**

Section 2 would require the Department of Social Services and the Board of Regents for Higher Education to identify any education program offered at a regional community-technical college that would meet the requirements of the Supplemental Nutrition Assistance Program employment and training (SNAP E&T) program and seek federal approval for such programs.

The Department currently contracts with all twelve community colleges as well as a number of community-based organizations to administer the SNAP E&T program. As part of this partnership, each year the colleges submit proposals and projections to the Department, including the academic programs being offered and the funding available to support the programs (SNAP E&T reimburses schools for 50% of qualifying expenditures). The Department uses this process to develop the state's SNAP E&T plan.

In addition, the Department and Connecticut State Colleges and Universities (CSCU) jointly identify any educational program offered at community colleges that meet the requirements for SNAP E&T and post those programs online. A list of those programs can be found here: [SNAP Employment and Training--Related Resources \(ct.gov\)](#). This list is updated annually based upon Connecticut's federally-approved SNAP E&T plan and identifies all of the programs offered, including those that offer certification as well as those that can lead to an Associate's degree.

Many of the community colleges also have dedicated portions of their website related to the SNAP E&T program. Two examples of this can be found here: [SNAP Education & Training Scholarship | Capital Community College \(capitalcc.edu\)](#) & [SNAP Employment & Training – Gateway Community College \(gatewayct.edu\)](#). These websites outline the eligibility criteria, application process, and programs that are available at the respective institutions.

While the Department appreciates and supports the intent of this legislation, we believe that the current SNAP E&T state plan development process and availability of information make it unnecessary to add more requirements in state statute.

Section 3 would require the Department to consider any student enrolled in an institution of higher education to be participating in a state or federally financed work-study program if such

student receives approval of work-study as part of a financial package to attend such institution, regardless of whether such student has received their work-study program assignment.

Under current federal law (7 CFR 273.5), students enrolled at least half-time in an institution of higher learning are ineligible for SNAP, unless they meet an exempt criteria. 7 CFR 273.5(b) provides a list of exemptions that students in institutions of higher education must meet in order to qualify for SNAP assistance. 7 CFR 273.5 (b)(6) states that, to qualify for SNAP, a student must “be *participating* in a State or federally financed work study program during the regular school year.” It further clarifies that to be approved for work-study at the time the student submits their application for SNAP benefits, the work-study must be approved by the college or university for the school term, and “*the student must anticipate actually working during that time.*”

Under this exemption, the student’s eligibility for SNAP benefits begins “with the month in which the school term begins, or the month work-study is approved, whichever is later. Once begun, the student shall continue to receive benefits until the end of the month in which the school term ends or until it becomes known that the student has refused an assignment.”

The Department would like to note that the recently passed federal Consolidated Appropriations Act of 2021 allows for some additional temporary flexibilities for student exemptions to SNAP for the duration of the federal public health emergency. Specifically, the Act changes the work study criteria from *participating* in a work-study program to *eligibility to participate* in a work-study program. This means if an individual qualified for a work-study program but is not currently working and does not anticipate working, they can still be considered an eligible student for the purposes of SNAP eligibility.

Additionally, the Act provides that, if an individual’s expected family contribution reported to financial aid for the current academic year is \$0, that individual can now be considered an eligible student for the purposes of SNAP eligibility. The Department is working with CSCU and the Connecticut Office of Higher Education so they are equipped to provide notifications to their institutions and direct communications to all students who may now qualify for SNAP assistance, including how they may apply for SNAP benefits. These flexibilities are temporary and are expected to end 30 days after the federal COVID-19 public health emergency is lifted.

Given the detailed federal regulations concerning student eligibility for SNAP, the Department respectfully requests that this section not be added to state statute as it is likely to cause confusion and, more importantly, it conflicts with federal law. The Department is available to provide guidance regarding current federal SNAP eligibility requirements if the Committee members would find this useful. Thank you for the opportunity to provide written testimony.