



# SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM: Estimated Eligibility and Receipt among Food Insecure College Students



## Estimated Eligibility and Receipt among Food Insecure College Students

### Why GAO Did This Study

In fiscal year 2023, the federal government spent approximately \$31.4 billion dollars on Pell Grants to help over 6 million students with financial need go to college. This substantial federal investment in higher education is at risk of not serving its intended purpose if college students drop out because of limited or uncertain access to food.

Some studies have found that food insecurity negatively affects students' academic success. Certain students are eligible for SNAP—the nation's largest nutrition assistance program available to low-income households.

Given the substantial federal investment in higher education, GAO was asked to review newly available Education data on food insecurity among a nationally representative sample of college students.

This report, which is the first of two reports on college student food insecurity, describes what Education's NPSAS data show about food insecurity among college students and their access to SNAP benefits. GAO's estimates are based on 2020 NPSAS data, which were the most recent available.

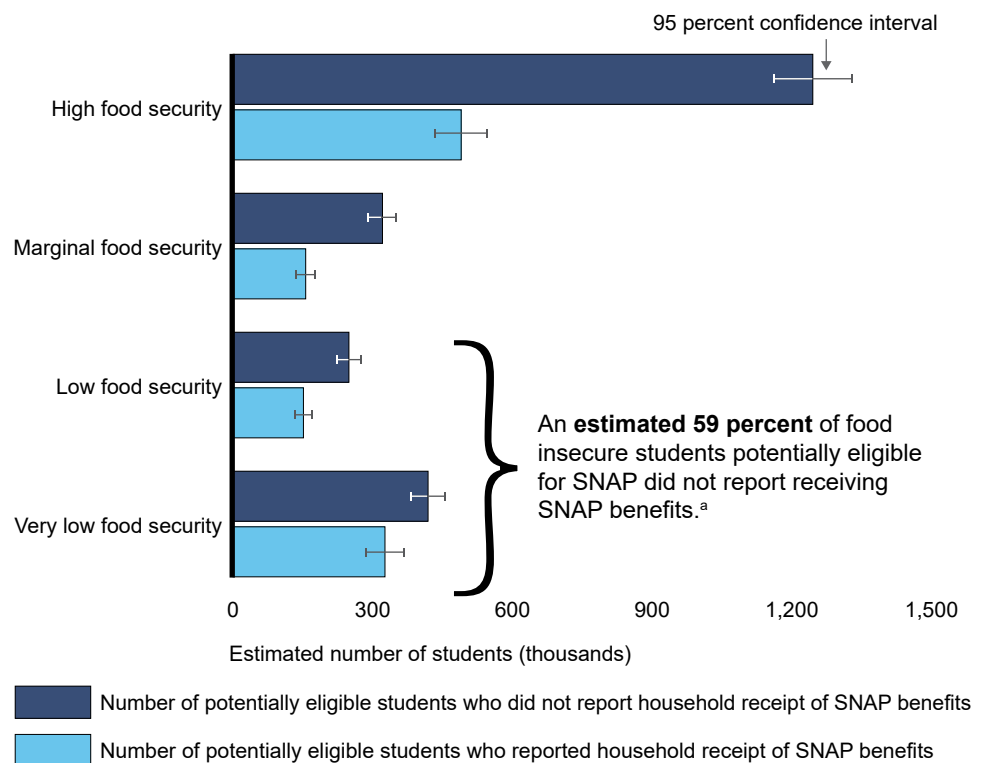
View [GAO-24-107074](#). For more information, contact Kathryn Larin at (202) 512-7215 or [larink@gao.gov](mailto:larink@gao.gov).

### What GAO Found

An estimated 23 percent of college students (3.8 million) experienced food insecurity in 2020, according to GAO's analysis of student data from the Department of Education's National Postsecondary Student Aid Study (NPSAS). The U.S. Department of Agriculture defines the range of food security to include high, marginal, low, and very low, and it categorizes those with low or very low food security as food insecure. Among food insecure students in 2020, a majority (2.2 million) had very low food security, meaning they reported multiple instances of eating less than they should or skipping meals because they could not afford enough food.

SNAP benefits are available to eligible low-income households to help them pay for food. For students to qualify for SNAP, they must meet additional student-specific criteria, such as working at least 20 hours a week at a paid job. Using available Education data, GAO estimated that fewer than two in five food insecure students met the criteria to be potentially eligible for SNAP. Of these students, 59 percent did not report receiving SNAP benefits in 2020.

### Estimated Supplemental Nutrition Assistance Program (SNAP) Receipt among Potentially Eligible College Students, 2020



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | [GAO-24-107074](#)

<sup>a</sup> The 95 percent confidence interval is within a margin of error of +/- 3 percentage points.

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441 G St. N.W.  
Washington, DC 20548

June 24, 2024

The Honorable David Scott  
Ranking Member  
Committee on Agriculture  
House of Representatives

The Honorable Robert C. “Bobby” Scott  
Ranking Member  
Committee on Education and the Workforce  
House of Representatives

In fiscal year 2023, the federal government spent approximately \$31.4 billion dollars on Pell Grants to help over 6 million students with financial need attend college.<sup>1</sup> This substantial federal investment in higher education is at risk of not serving its intended purpose if college students drop out because of limited or uncertain access to food. According to some studies, students who experience food insecurity are more likely to have lower grades and less likely to graduate compared to their peers.<sup>2</sup> Food insecure students are also more likely to report symptoms of depression and anxiety.<sup>3</sup>

Although no existing federal program has the specific goal of addressing food insecurity among college students, certain students may be able to receive assistance from the Supplemental Nutrition Assistance Program (SNAP).<sup>4</sup> SNAP is the nation’s largest nutrition assistance program available to low-income households.<sup>5</sup> College students

<sup>1</sup>For the purposes of this report, “colleges” include 2- and 4-year degree-granting institutions of higher education, as well as providers of technical training in shorter certificate programs. Unless otherwise noted, “college students” refers to undergraduate students enrolled in one of these institutions. The Pell Grant is the largest federal grant program offered to undergraduates and is designed to assist students from low-income households. To qualify for a Pell Grant, a student must demonstrate financial need through the Free Application for Federal Student Aid (FAFSA).

<sup>2</sup>According to the U.S. Department of Agriculture, food insecurity occurs when, at times, individuals or households are unable to acquire adequate food for one or more household members because they did not have enough money or other resources. Julia A Wolfson, Noura Insolera, Alicia Cohen, and Cindy W. Leung. “The effect of food insecurity during college on graduation and type of degree attained: Evidence from a nationally representative longitudinal survey.” *Public Health Nutrition*, vol. 25, no. 2 (2022): 389-397. Robert R. Weaver, Nicole A. Vaughn, Sean P. Hendricks, Penny E. McPherson-Myers, Qian Jia, Shari L. Willis, and Kevin P. Rescigno. “University student food insecurity and academic performance.” *Journal of American College Health*, vol. 68, no. 7 (2020): 727-733.

<sup>3</sup>Hans Oh, Lee Smith, Louis Jacob, Jinyu Du, Jae Il Shin, Sasha Zhou, and Ai Koyanagi. “Food Insecurity and Mental Health Among Young Adult College Students in the United States.” *Journal of Affective Disorders*. 303 (2022): 359-363. Devon C. Payne-Sturges, Allison Tjaden, Kimberly M. Caldeira, Kathryn B. Vincent, Amelia M. Arria. “Student Hunger on Campus: Food insecurity among college students and implications for academic institutions.” *American Journal of Health Promotion*. (2018) 32(2): 349-354.

<sup>4</sup>Federal student aid—including federal student loans—may be used to pay for students’ food and other costs while in school. When calculating students’ full cost of attendance, colleges include not only tuition and fees, but also room and board and other miscellaneous expenses. The amount of federal student aid (such as Pell Grant Aid) a student is eligible for is based, in part, on the full cost of attendance. We previously reported based on interviews with officials that federal need-based aid alone is generally not enough to cover the full cost of attendance for low-income students. GAO, *Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits*. GAO-19-95 (Washington D.C.: Dec. 21, 2018).

<sup>5</sup>SNAP eligibility is largely based on a household’s income. In general, SNAP defines a household as individuals living together who purchase food and prepare meals together. A single individual living alone or purchasing and preparing meals alone would also be considered a household for purposes of SNAP eligibility.



who are enrolled at least half time must meet specific eligibility criteria to receive benefits. These eligibility criteria were designed to prevent students from higher income families from qualifying for SNAP as separate low-income households while enrolled in college.<sup>6</sup> In addition, we reported in 2018 that almost 2 million at-risk college students who were potentially eligible for SNAP did not report receiving benefits.<sup>7</sup>

The Department of Education added a measure of college student food security to its 2020 National Postsecondary Student Aid Study (NPSAS), which for the first time collected survey responses on food insecurity from a nationally representative sample of students. You asked us to review the issue of food insecurity among college students. This report describes what Education's NPSAS data show about food insecurity among college students and their access to SNAP benefits. This report is the first of two products on college student food insecurity.

## Scope and Methodology

We analyzed data from the 2020 NPSAS, the most recent year available, to understand what college students reported about experiencing food insecurity.<sup>8</sup> We used these data to provide descriptive information about those students' college enrollment, financial, and demographic characteristics. We also analyzed available data in the NPSAS to estimate potential SNAP eligibility and students' household receipt of benefits. We assessed the reliability of NPSAS data by reviewing existing information about the data and the system that produced them and by interviewing agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report. Unless otherwise noted, all percentage estimates from the NPSAS data analysis have 95 percent confidence intervals with margins of error of +/- 4 percentage points or fewer. See appendix I for additional information about our scope and methodology and limitations of our estimate of students' potential eligibility for and receipt of SNAP.

We conducted this performance audit from September 2023 to June 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>6</sup>Students enrolled at least half time in an institution of higher education are typically ineligible for SNAP benefits unless they meet certain exemptions. College student SNAP exemptions are tied to a student's age, access to child care, receipt of Temporary Assistance for Needy Families benefits, enrollment in certain employment and training programs, or employment of at least 20 hours a week, among other things. In addition to meeting at least one exemption, students must still meet the standard eligibility criteria (e.g., income and asset limits) to be eligible for benefits. More information about how to determine if a student is subject to these restrictions is available in appendix II.

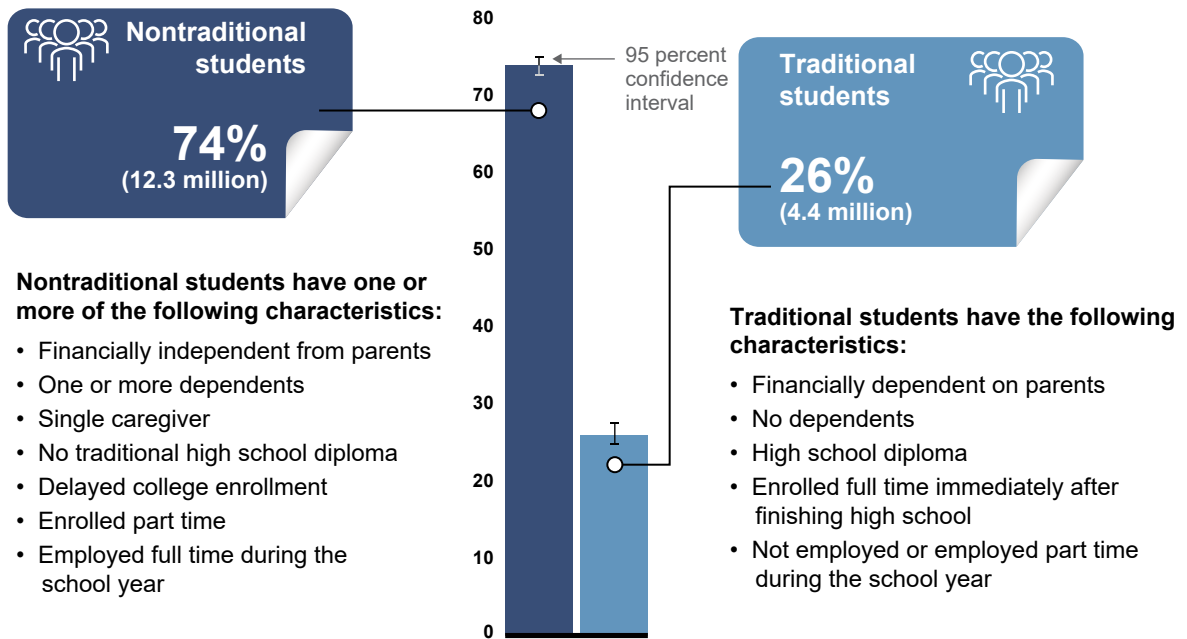
<sup>7</sup>In 2018, we recommended the Food and Nutrition Service (FNS) make information about student eligibility easier to understand and more accessible to students, and to collect and share information about SNAP flexibilities for college students with state SNAP agencies. FNS addressed our two recommendations by revising its SNAP student eligibility website and sharing information on SNAP flexibilities with students, college officials, and state agencies. See [GAO-19-95](#).

<sup>8</sup>The 2020 NPSAS survey component was fielded in March 2020, just as COVID-19 was spreading though the U.S. and a national emergency was declared. At this time, many students and institutions were in a period of flux and uncertainty because of the pandemic. For more information see appendix I.

## College Student Demographics

Education characterizes a traditional college student as one who attends classes full time, enrolls immediately after high school, relies on their parents for financial support, and works only part time or not at all during the school year.<sup>9</sup> According to NPSAS data, traditional students made up a relatively small share of the roughly 16.7 million college students in 2020, and an estimated 74 percent of students were nontraditional (see fig. 1). Education has reported that nontraditional student characteristics, including being a single parent, delaying college enrollment, and working full time, are negatively associated with students' likelihood of staying enrolled in school and completing a degree.<sup>10</sup>

**Figure 1: Estimated Percentages and Characteristics of Traditional and Nontraditional Undergraduate College Students, 2020**



Source: GAO analysis of U.S. Department of Education 2020 National Postsecondary Student Aid Study (NPSAS) data. | GAO-24-107074

Notes: Categories of traditional and nontraditional students are based on the Department of Education's definition. The 95 percent confidence intervals for the estimated number of nontraditional students are (11.6 million, 13.1 million) and (4.1 million, 4.6 million) for traditional students.

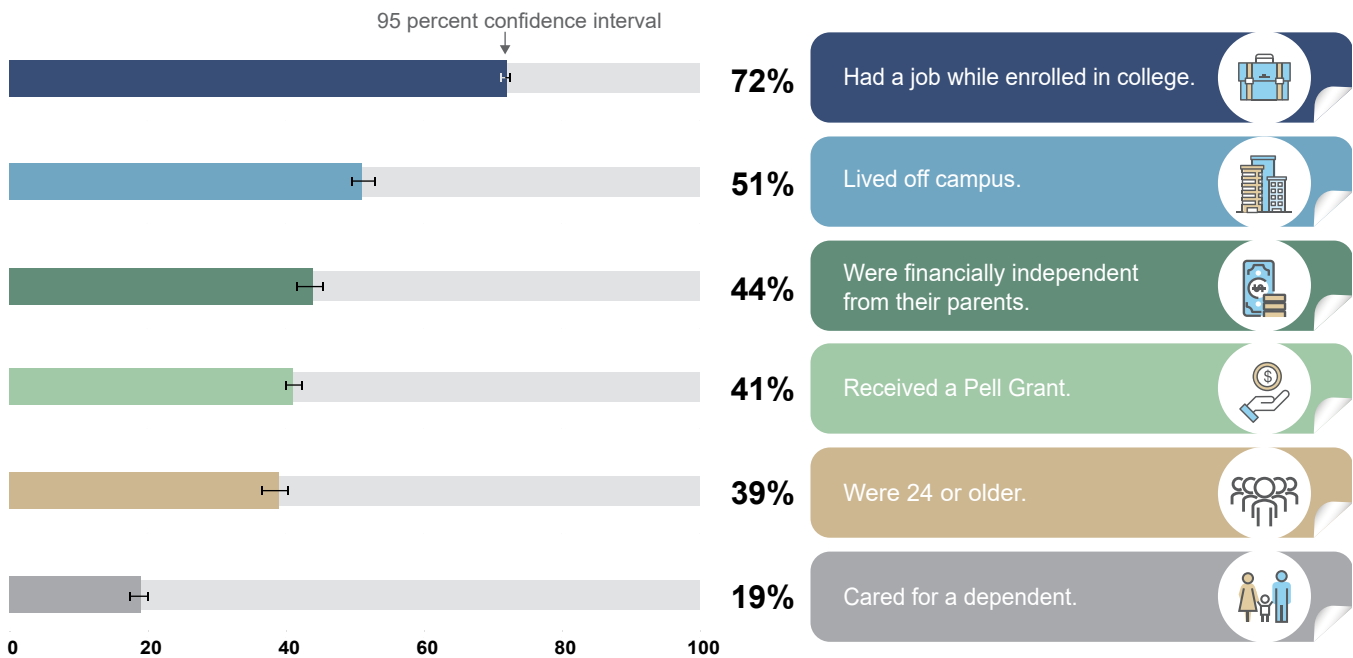
A large share of all college students balanced demands and responsibilities outside of the classroom in 2020. According to NPSAS data, an estimated 72 percent of students worked while enrolled, with 41 percent working full time. An estimated one in five students cared for a child or other dependent. Around half of students commuted from off-campus housing (see fig. 2). Additionally, many students

<sup>9</sup>U.S. Department of Education, National Center for Education Statistics, *Nontraditional Undergraduates*, NCES 2002–012 (Washington, D.C.: 2002).

<sup>10</sup>Alexandria Walton Radford, Melissa Cominole, and Paul Skomsvold. "Demographic and Enrollment Characteristics of Nontraditional Undergraduates: 2011-12. Web Tables. NCES 2015-025." U.S. Department of Education National Center for Education Statistics (2015).

in 2020 were from low-income households. Over the past few decades, the share of low-income students has increased. The percentage of college students who had a household income at or below 130 percent of the federal poverty level was 28 percent in 1996 and increased to 34 percent in 2020.

**Figure 2: Estimated Percentages of All Undergraduate Students with Selected Characteristics, 2020**



Source: GAO analysis of U.S. Department of Education 2020 National Postsecondary Student Aid Study (NPSAS) data. GAO (icons). | GAO-24-107074

## Measuring Food Security

Food insecurity occurs when, at times, households are unable to acquire adequate food for one or more household members because they did not have enough money or other resources. The number of food-insecure conditions and behaviors a household reports determines the food security status of each household. The U.S. Department of Agriculture (USDA) uses four categories to define the range of food security:

- **High food security.** Households had no problems, or anxiety about, consistently accessing adequate food.
- **Marginal food security.** Households had problems at times, or anxiety about, accessing adequate food, but the quality, variety, and quantity of their food intake were not substantially reduced.
- **Low food security.** Households reduced the quality, variety, and desirability of their diets, but the quantity of food intake and normal eating patterns were not substantially disrupted.
- **Very low food security.** At times during the year, eating patterns of one or more household members were disrupted and food intake reduced because the household lacked money and other resources for food.<sup>11</sup>



Source: USDA (text); GAO (icons). | GAO-24-107074

<sup>11</sup>USDA, "Food Security in the U.S.: Measurement", accessed March 6, 2024, <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/measurement/#survey>.

USDA considers households with low and very low food security as experiencing food insecurity. USDA developed a series of survey questions designed to measure household food security, which collect some information about the conditions that may lead to hunger but do not directly assess hunger.<sup>12</sup> According to Education officials, they worked with USDA to modify these questions to measure college student food security (see sidebar for a list of the food security survey questions that Education used in the 2020 NPSAS).

## College Student Eligibility for SNAP

The Food and Nutrition Service within USDA oversees states' administration of SNAP, the primary federal benefit program to address food insecurity among low-income households.<sup>13</sup> SNAP has both financial and non-financial household eligibility rules. Financial eligibility rules require that applicants' income and—in some states—assets fall below a certain threshold. Applicants are also subject to certain non-financial rules, including citizenship and crime-related restrictions. Generally, to be eligible for SNAP benefits under federal law, a household's gross income cannot exceed 130 percent of the federal poverty level (in 2020 this was an annual income of \$34,060 for a family of four).<sup>14</sup>

<sup>12</sup>USDA has studied and validated the use of its food security survey module among the general population and selected subpopulations. Findings show that most households have expected response patterns and strong model fit. Analyses have found some evidence of underreporting of more severe food-insecure conditions but no evidence of overreporting of food-insecure conditions in the general population. M.P. Rabbitt, L.J. Hales, M.P. Burke, and A. Coleman-Jensen. (2023). *Household food security in the United States in 2022* (Report No. ERR-325). U.S. Department of Agriculture, Economic Research Service.

<sup>13</sup>Some people who live together are included in the same household for determining SNAP eligibility even if they purchase and prepare meals separately, such as spouses and children under 22 living with their parents. In the case of a college student who is considered dependent for the purpose of calculating federal student aid who does not live with their parents while in school, the household for determining SNAP eligibility might be the student alone. Roommates may be considered a household if they customarily buy food and prepare meals together.

<sup>14</sup> C.F.R. § 273.9(a)(1)(i). Household gross income at or below 130 percent of the federal poverty level (FPL) is the standard income requirement to qualify for SNAP benefits for households that do not include a member 60 or older or disabled. States may also adopt broad-based categorical eligibility policies that apply to a larger group of low-income households. Through this option, states may choose to confer SNAP eligibility to households that receive certain other means-tested benefits, which often have gross income limits above 130 percent of the federal poverty level (but no higher than 200 percent). As of January 2024, 44 states (including states, U.S. territories, and the District of Columbia) have implemented broad-based categorical eligibility for SNAP, with most states (37 of 44) using an FPL above 130 percent, and 24 states using 200 percent. Additionally, most states (40 of 44) that use broad-based categorical eligibility do not limit assets. In fiscal year 2020, USDA estimated that about 1.5 percent of SNAP benefits went to households with gross income at or above 131 percent of the federal poverty level.

## National Postsecondary Student Aid Study (NPSAS) Food Security Survey Questions



For statements 1-3, please tell me whether the statement was often true, sometimes true, or never true for you in the last 30 days:

1. I worried whether my food would run out before I got money to buy more.
2. The food I bought just didn't last, and I didn't have money to get more.
3. I couldn't afford to eat balanced meals.
4. In the last 30 days, have you ever cut the size of your meals or skipped meals because there wasn't enough money for food?
5. (If yes to 4) In the last 30 days, how many days did this happen?
6. In the last 30 days, did you ever eat less than you felt you should because there wasn't enough money for food?
7. In the last 30 days, were you ever hungry but didn't eat because there wasn't enough money for food?
8. In the last 30 days, did you lose weight because there wasn't enough money for food?
9. In the last 30 days, did you ever not eat for a whole day because there wasn't enough money for food?
10. (If yes to 9) In the last 30 days, how many days did this happen?

Source: U.S. Department of Education 2020 National Postsecondary Student Aid Study. GAO (icons). | GAO-24-107074



The Food Stamp Act Amendments of 1980 restricted college students' eligibility for SNAP benefits unless they meet certain additional criteria.<sup>15</sup> Congress established this restriction because of concerns that students from higher income families, who receive financial support from their parents, were qualifying for SNAP by appearing to have a low income while in college. There are several exemptions to this restriction so that certain students can access benefits.<sup>16</sup> Assuming they meet all other SNAP eligibility requirements, a student may be eligible for SNAP benefits if they are:

- younger than 18 or 50 or older;<sup>17</sup>
- a parent caring for a child under age 6;
- a parent who is caring for a child aged 6 to 11 and is unable to obtain childcare to attend school and work;
- a single parent enrolled full-time caring for a child under age 12;
- working a minimum of 20 hours per week at paid employment;
- participating in a state- or federally-funded work-study program;
- receiving Temporary Assistance for Needy Families (TANF) benefits;<sup>18</sup>
- not physically or mentally fit (e.g., have a disability);<sup>19</sup> or
- enrolled in certain programs for the purpose of employment and training.<sup>20</sup>

As part of the response to the COVID-19 public health emergency, two additional exemptions were enacted that temporarily offered SNAP eligibility to students who:

- were eligible to participate in state- or federally-funded work-study during the regular academic year, as determined by their college, or<sup>21</sup>
- had an Expected Family Contribution (or EFC, which is based on a student's FAFSA) of \$0 during the academic year. This included students who were eligible for a maximum Pell Grant award.<sup>22</sup>

<sup>15</sup>Pub. L. No. 96-249, tit. I, § 139, 94 Stat. 357, 370. Federal law restricts access to SNAP benefits for individuals enrolled half time or more in an institution of higher education. The Food and Nutrition Service issued guidance in February 2023 to help clarify which students are subject to the SNAP restrictions (see appendix II for more details). For the purposes of discussing student access to SNAP benefits in this report, we will refer to these individuals as college students.

<sup>16</sup>U.S.C. § 2015(e). Throughout this report we refer to these as student eligibility exemptions. Students who meet one of these student eligibility exemptions must still apply for SNAP and meet the household income and asset limits, among other eligibility criteria, to be determined eligible to receive SNAP benefits.

<sup>17</sup>In 2023, a modification to the SNAP age-based work exemption was enacted which is applicable to college students and other adults. Between fiscal year 2023 and 2025 the age at which individuals will be exempt from the work requirement will increase in stages from 50 to 55. Fiscal Responsibility Act of 2023, Pub. L. No. 118-5, tit. II, § 311, 137 Stat. 10, 36.

<sup>18</sup>TANF is a block grant to states to help meet the needs of low-income families. The program emphasizes work and cash assistance and gives states wide discretion on how to use TANF funds, including for various noncash services.

<sup>19</sup>Students are exempt from SNAP ineligibility if they are "not physically or mentally fit." For ease of reference, in this report we use the term "disability" to refer to this student SNAP exemption.

<sup>20</sup>FNS officials told us that states have flexibility regarding which programs may qualify a student for the exemption that pertains to enrollment in certain programs for the purpose of employment and training.

<sup>21</sup>Participating in a state- or federally-funded work-study program is among the standard SNAP exemptions; however, during the COVID-19 public health emergency this exemption was modified to include students who were eligible for work-study but did not require students to obtain a work-study job.

<sup>22</sup>EFC is a number that helps determine students' eligibility for certain types of federal student aid. This number is calculated using the information that students provide on their FAFSA. Colleges subtract the EFC and other financial assistance from students' cost of attending school to determine their need for federal student financial aid. As a result of the FAFSA Simplification Act amendments to the Higher Education Act, EFC will be replaced with the Student Aid Index starting with the 2024-25 school year.

These temporary student exemptions expired in June 2023 following the end of the public health emergency.<sup>23</sup>

Even if students meet an exemption, they may not qualify for SNAP benefits if they live on campus and get more than one-half of their meals from a school meal plan.<sup>24</sup> In addition, under current law, SNAP benefits generally cannot be used to purchase cafeteria meals.<sup>25</sup> Students attending an institution less than half-time are not subject to the same restrictions as students attending half time or more, but they are subject to the regular SNAP eligibility rules for the larger population.<sup>26</sup>

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<sup>23</sup>If students recertified for SNAP by June 30, 2023, they may still have qualified under the temporary student exemptions. If students recertify for SNAP after June 30, 2023, they must meet one of the standard student exemptions listed in regulations. Often states require households to certify their SNAP eligibility every 6 months.

<sup>24</sup>See 7 U.S.C. § 2012(m)(4).

<sup>25</sup>7 U.S.C. § 2016(b).

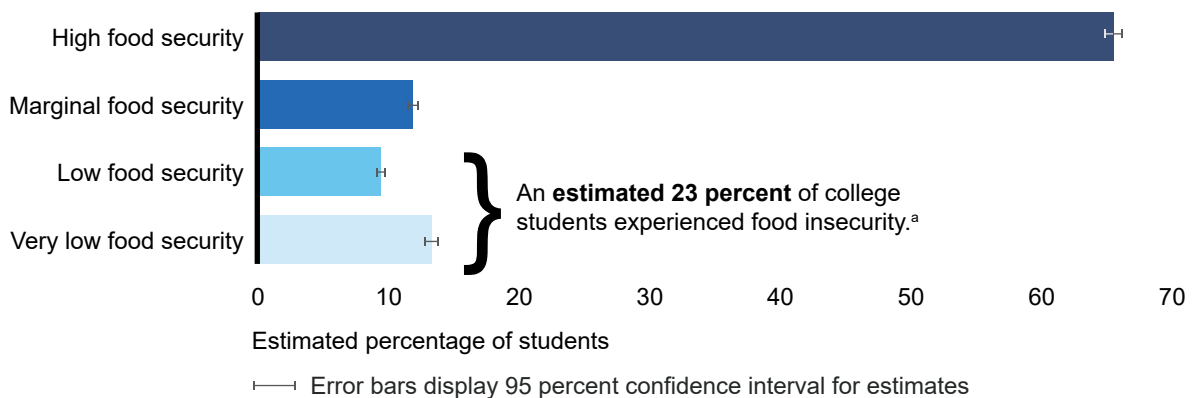
<sup>26</sup>7 U.S.C. §§ 2014, 2015; 7 C.F.R. § 273.9(a)(1)(i).

# Estimate of Food Insecurity among College Students

## A Majority of Food Insecure Students Had Very Low Food Security, and Such Students Made up Relatively Larger Shares of For-Profit and Minority-Serving Schools

According to our analysis of 2020 NPSAS data, an estimated 23 percent of students (3.8 million) reported experiencing food insecurity. A majority of those students (2.2 million) experienced very low food security, meaning they reported multiple instances of eating less than they should or skipping meals because they could not afford enough food (see fig. 3).<sup>27</sup>

**Figure 3: Estimated Food Security Status among College Students, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. An estimated 12 percent of graduate students also experienced food insecurity in 2020. An estimated 6 percent of graduate students had very low food security.

<sup>a</sup>The 95 percent confidence interval for this estimate is (22, 23).

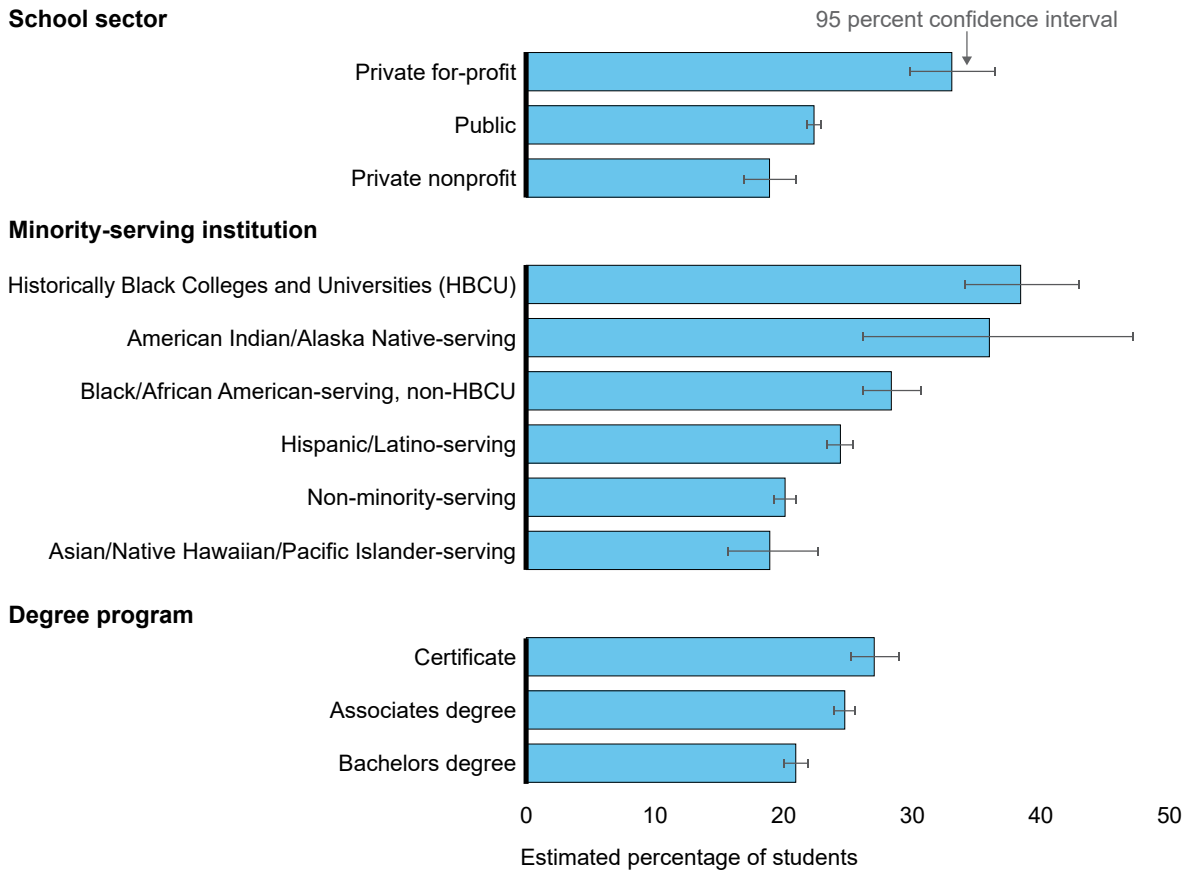
An estimated 3.0 million food insecure students (79 percent) were enrolled at least half time in 2020, making them subject to the SNAP student restrictions. The remaining 21 percent of food insecure students (791,000) were enrolled less than half time and would not be considered students for the purpose of determining SNAP eligibility (see appendix I for more information about how we identified students enrolled at least half time and appendix II for more information about how USDA defines a college student for the purpose of determining SNAP eligibility).

Food insecure students attended for-profit and minority-serving institutions and enrolled in short-term programs at rates higher than other types of colleges and programs. Compared to public and private nonprofit colleges, private for-profit colleges enrolled a larger share of food insecure students. Yet, because substantially more students enrolled in public colleges overall, a larger number of

<sup>27</sup>The 95 percent confidence interval for the estimated number of food insecure students is (3.5 million, 4.0 million), and the estimate of the number of students with very low food security is (2.1 million, 2.4 million). The estimated rate of food insecurity among college students was about double that of households in the U.S. overall, which USDA estimated to be about 11 percent in 2020. U.S. Department of Agriculture, Economic Research Service, *Household Food Security in the United States in 2020*, ERR-298 (September 2021).

students experiencing food insecurity were enrolled in public colleges (2.8 million) compared to for-profit colleges (441,000).<sup>28</sup> Minority serving institutions generally enrolled a larger share of food insecure students compared to colleges not considered minority-serving institutions. For example, an estimated 38 percent of students who attended Historically Black Colleges and Universities (HBCU) were food insecure compared to an estimated 20 percent at colleges not considered a minority-serving institution (see fig.4). The share of food insecure students enrolled in certificate and associate degree programs was higher than that among students enrolled in bachelor’s degree programs.

**Figure 4: Estimated Percentage of the College Student Population That Experienced Food Insecurity, by Type of School or Program, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. Education classifies colleges as minority-serving based on either one of two separate criteria: legislation or the percentage of minority student enrollment. Federal law designates HBCUs and Tribal Colleges and Universities (TCUs). Education used enrollment-based criteria to identify institutions that served substantial proportions of minority students but did not have legal status as an HBCU or TCU.

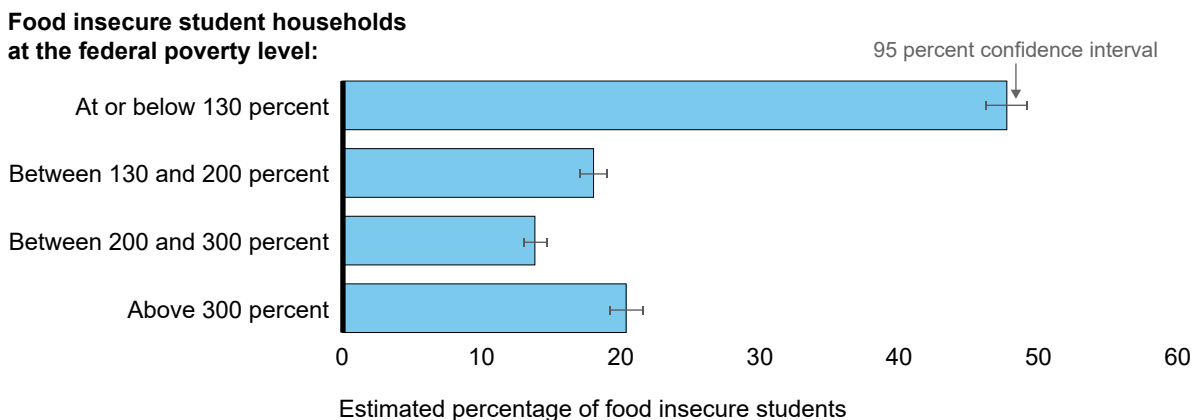
<sup>a</sup>American Indian/Alaska Native-serving institutions includes TCUs or institutions where American Indians/Alaska Natives constitute at least 25 percent of the undergraduate enrollment while students of all other individual minority groups each constitute less than 25 percent of the undergraduate enrollment and are not designated as an HBCU.

<sup>28</sup>The 95 percent confidence intervals for these estimates are (2.6 million, 3.0 million) and (311,000, 570,000) respectively.

## Many Food Insecure Students in 2020 Were Low-Income and Most Were Nontraditional Students

According to our analysis of 2020 NPSAS data, nearly one-half of the estimated 3.8 million food insecure students had household incomes at or below 130 percent of the federal poverty level (an estimated 48 percent). While many food insecure students were from low-income households in 2020, an estimated 20 percent of food insecure students had household incomes over 300 percent of the federal poverty level (see fig. 5). In 2020, 300 percent of the federal poverty level was an annual income of \$78,600 for a family of four.

**Figure 5: Estimated Percentage of Food Insecure College Students by Household Income as a Percent of Poverty, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

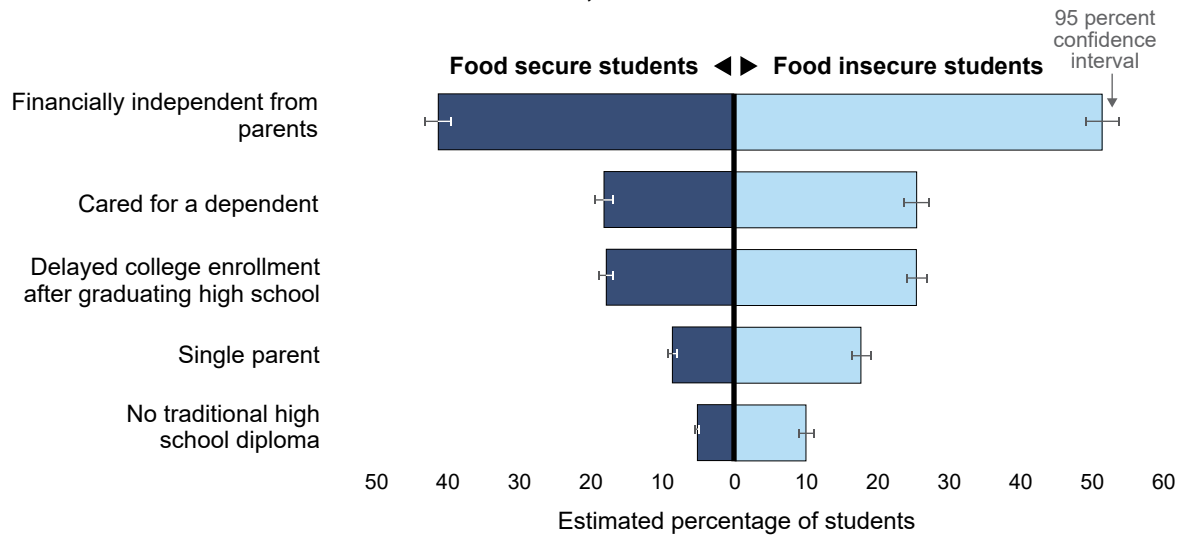
Note: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers.

An estimated 80 percent of food insecure students were considered nontraditional, such that they had at least one characteristic that Education has reported is negatively associated with students’ likelihood of completing a degree. Food insecure students had many of these nontraditional student characteristics at rates higher than food secure students (see fig. 6). For example, an estimated 25 percent of food insecure students delayed college enrollment after graduating from high school, compared to 18 percent of food secure students. Additionally, a greater share of food insecure students were caring for dependents compared to food secure students, and an estimated 18 percent of food insecure students were single parents compared to an estimated 9 percent of food secure students.<sup>29</sup>

<sup>29</sup>We previously reported that Education data indicate that a lower percentage of undergraduate student parents earned a degree compared to students without children. According to our analysis of Education data from 2009, an estimated 52 percent of undergraduate student parents left school without a degree within 6 years, compared to 32 percent of students without children. GAO, *Higher Education: More Information Could Help Student Parents Access Additional Federal Student Aid*, GAO-19-522 (Washington, D.C.: Aug. 20, 2019).



**Figure 6: Estimated Percentage of Food Secure and Food Insecure College Students with Selected Nontraditional Student Characteristics, 2020**

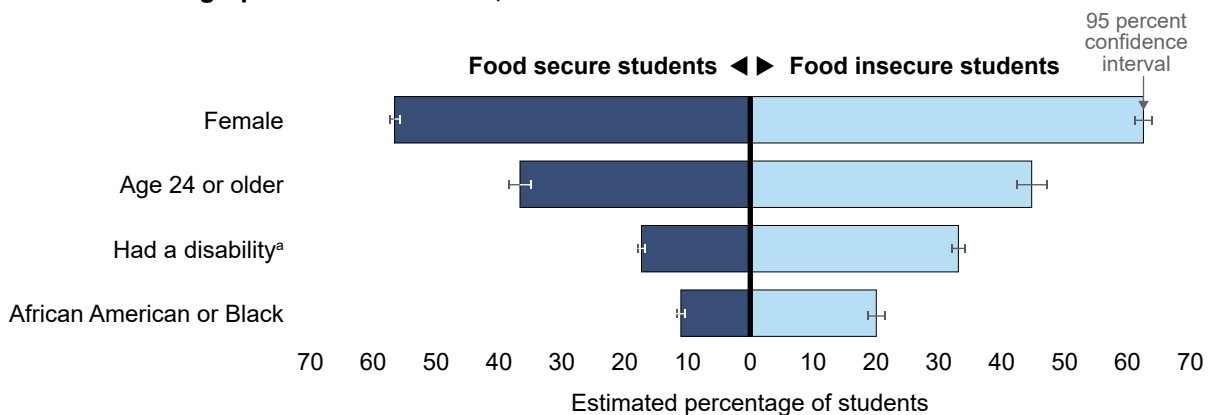


Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Note: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers.

Among the different demographic categories we analyzed, we found that students with certain traits accounted for a higher share of food insecure students compared to food secure students (see fig. 7). For example, an estimated 33 percent of food insecure students reported having a disability compared to 17 percent of food secure students. An estimated 45 percent of food insecure students were age 24 or older compared to 37 percent of food secure students.

**Figure 7: Estimated Percentage of Food Secure and Food Insecure College Students with Selected Demographic Characteristics, 2020**



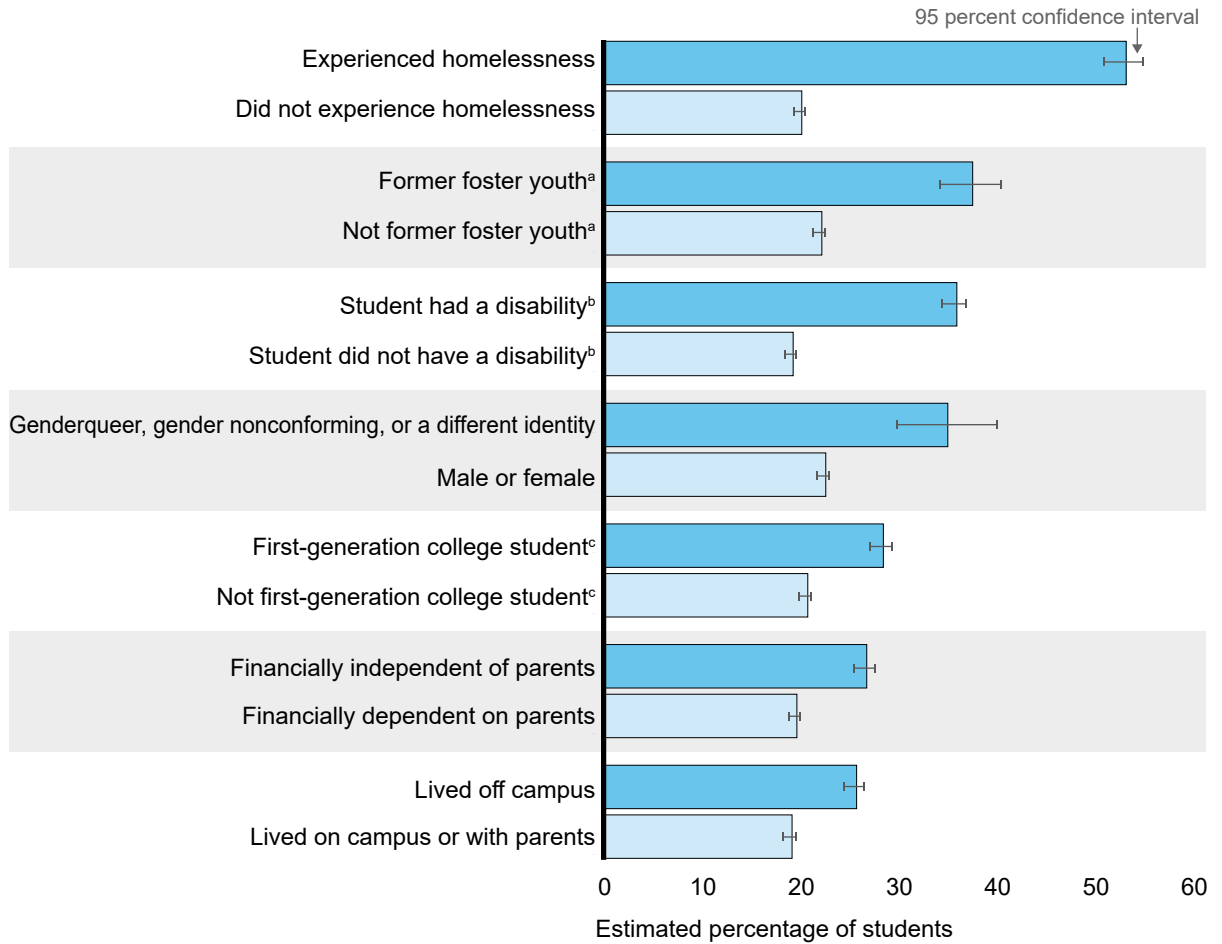
Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Note: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers.

<sup>a</sup>Students self-report their disability status.

Students with certain other characteristics were food insecure at rates higher than their peers (see fig. 8). Notably, an estimated 53 percent of students who experienced homelessness were also food insecure compared to 20 percent of students who were not. Genderqueer or gender nonconforming students experienced food insecurity at a rate higher than male or female students. Students living off-campus also experienced higher rates of food insecurity compared to students living on-campus or with their parents.

**Figure 8: Estimated Food Insecurity Rates among College Students with and without Selected Characteristics, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Note: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers.

<sup>a</sup>The variable GAO used as a proxy for having been a former foster youth is indicated by being an orphan or ward of the court.

<sup>b</sup>Students self-report their disability status.

<sup>c</sup>Education determined first generation college student status based on whether students reported that their parents attended college.

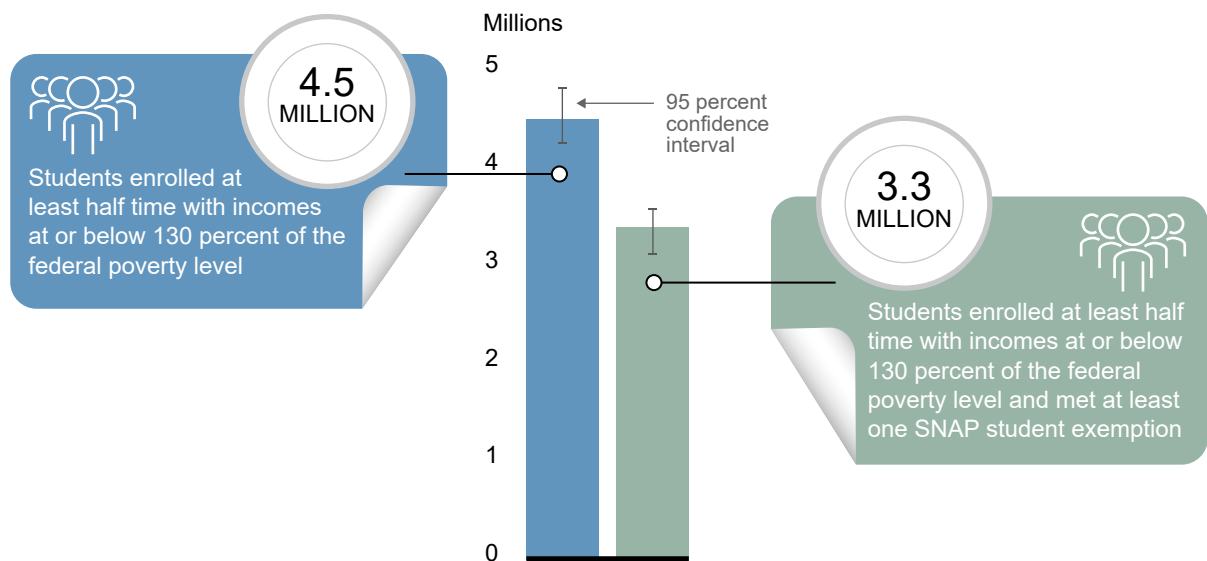
SECTION  
2:

# Estimate of College Students' Potential Eligibility for SNAP Benefits

## An Estimated 3.3 Million Students Were Potentially Eligible for SNAP in 2020, with a Majority of Them Working at Least 20 Hours Per Week

We estimated that 3.3 million college students were potentially eligible for SNAP benefits in 2020.<sup>30</sup> To develop this estimate, we first identified students who were enrolled at least half time (and therefore subject to the college student SNAP restrictions) and had household incomes at or below 130 percent of the federal poverty level (the basic income eligibility threshold for SNAP benefits).<sup>31</sup> An estimated 4.5 million of the total 16.7 million college students potentially met these criteria.<sup>32</sup> Of these students, an estimated 74 percent (3.3 of 4.5 million) met at least one of the student SNAP exemptions that we could identify using the NPSAS data.

**Figure 9: Estimated Number of College Students Who Met Supplemental Nutrition Assistance Program (SNAP) Enrollment, Income, and Student Exemption Criteria, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. GAO identified students potentially eligible for SNAP based on characteristics identified in the NPSAS data related to SNAP eligibility. Specifically, GAO looked at whether students had an income at or below 130 percent of the federal poverty level and reported one of the characteristics GAO identified that correspond with a student exemption. GAO did not make any legal determination about actual SNAP eligibility for any individual.

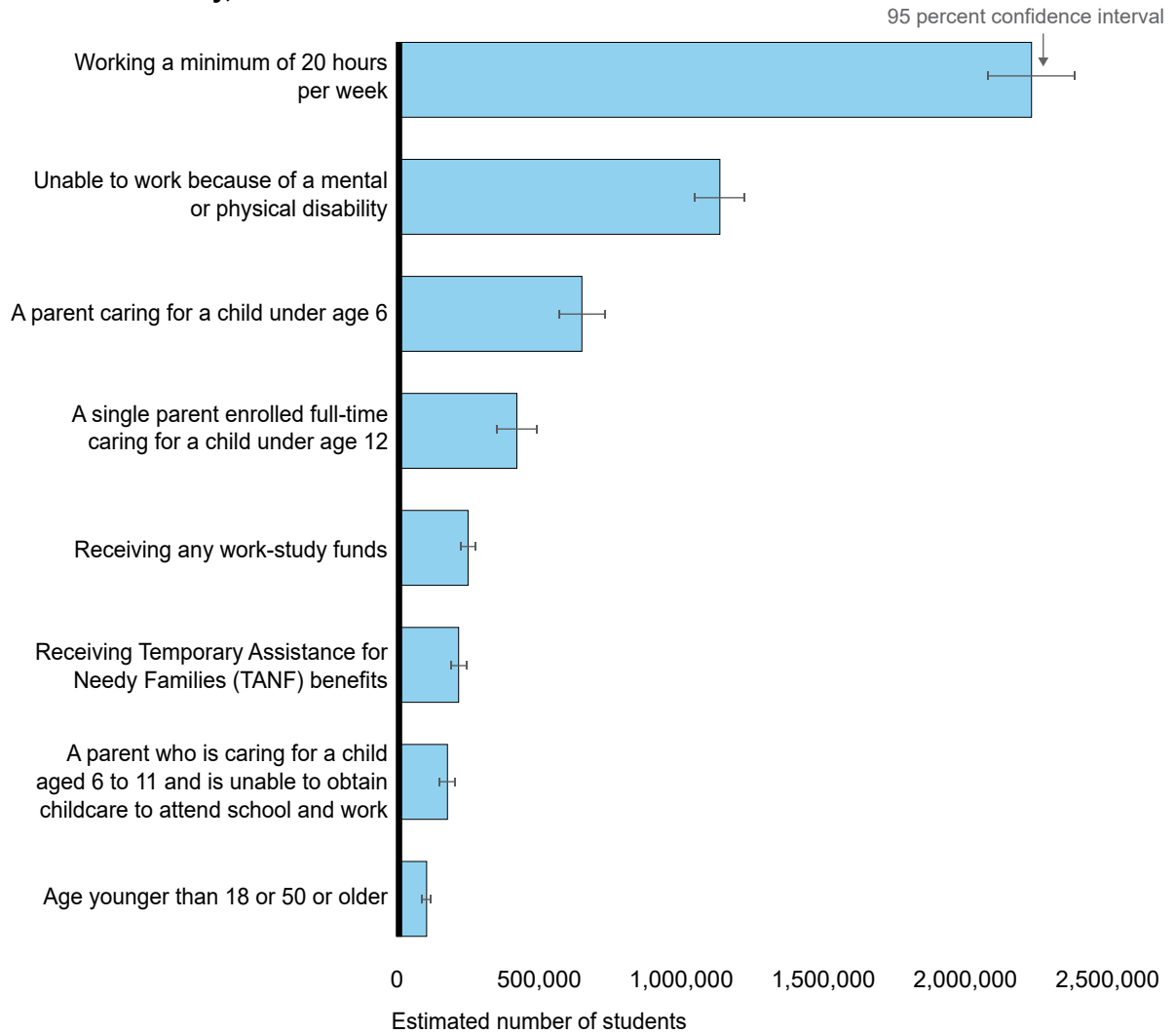
<sup>30</sup>The 95 percent confidence interval for the estimate of the number of students potentially eligible for SNAP is (3.1 million, 3.6 million). Additionally, an estimated 15 percent of graduate students were potentially eligible for SNAP.

<sup>31</sup>This estimate represents students potentially eligible for SNAP, regardless of food security status. In some ways our estimate of potential SNAP eligibility may undercount the total number of students who are likely to meet a SNAP student exemption, particularly because the NPSAS data set does not include a variable that would allow us to identify students enrolled in an employment or training related program. In other ways we may be overestimating the number of students potentially eligible for SNAP. For example, the NPSAS variables relating to students’ disability status and access to childcare did not align perfectly with the SNAP student exemptions. We did not make any legal determination about actual SNAP eligibility for any individual. See appendix I for more information about how we estimated students’ potential SNAP eligibility.

<sup>32</sup>The 95 percent confidence interval for these estimates is (4.3 million, 4.8 million) and (15.8, 17.5 million) respectively.

Of these potentially SNAP eligible students, the most common student exemption they met according to NPSAS data was working at least 20 hours per week (see fig. 10). An estimated 67 percent of potentially SNAP eligible students met this exemption.

**Figure 10: Estimated Number of College Students Who Met a Supplemental Nutrition Assistance Program (SNAP) Student Exemption Identified in the National Postsecondary Student Aid Study, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. GAO identified students potentially eligible for SNAP based on characteristics identified in the NPSAS data related to SNAP eligibility. Specifically, GAO looked at whether students had an income at or below 130 percent of the federal poverty level and reported one of the characteristics GAO identified that correspond with a student exemption. GAO did not make any legal determination about actual SNAP eligibility for any individual. Some students may meet multiple SNAP exemptions and would be counted multiple times in this figure.

## Most Students Potentially Eligible for SNAP Also Received Need-Based Student Aid, yet about One-Third Reported Being Food Insecure

An estimated 76 percent of students who were potentially eligible for SNAP received a Pell Grant—the primary source of federal need-based grant aid.<sup>33</sup> In 2020, students with an expected family contribution (EFC) of zero, as determined by their FAFSA, were eligible to receive the maximum Pell Grant award amount.<sup>34</sup> This grant aid can be used to help cover the cost of food and other expenses, including tuition and fees, while in college. However, even among students who received a Pell Grant, an estimated 31 percent reported experiencing food insecurity, with a majority of these students experiencing very low food security.<sup>35</sup> Moreover, an estimated 13 percent of students potentially eligible for SNAP did not complete a FAFSA, which is required for students to access federal student aid.

We estimated that 88 percent of the students potentially eligible for SNAP had an EFC of zero in 2020.<sup>36</sup> The average EFC among students potentially eligible for SNAP was an estimated \$370 compared to \$16,360 for students not potentially eligible for SNAP.<sup>37</sup> A vast majority (95 percent) of students potentially eligible for SNAP had an estimated EFC below approximately \$980.

During the COVID-19 public health emergency, federal law temporarily expanded SNAP eligibility to students who had a zero EFC, which increased the total number of students eligible for benefits. We estimated that adding zero EFC to the standard student SNAP exemptions would have expanded eligibility to an additional 1 million students (resulting in an estimated 4.4 million total students potentially eligible for SNAP).<sup>38</sup> This means that these additional students had a household income at or below 130 percent of the federal poverty level and had a zero EFC, but they met none of the standard student exemptions that we could identify (see fig. 11).<sup>39</sup>

If the only student exemption used to qualify students for SNAP benefits was zero EFC—and the standard student exemptions were eliminated—we estimated that some students would lose eligibility and others would gain eligibility. Specifically, this would result in a net addition of an estimated 624,000 students becoming eligible for SNAP (resulting in a total of 4.0 million students potentially

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<sup>33</sup>This estimate includes students who received any amount of Pell Grant aid in 2020, not just the maximum award amount. According to Education, starting with the 2024-25 award year, Pell Grant eligibility will be calculated differently and linked to students' family size and federal poverty level. Education estimates that these changes will result in approximately 610,000 new students receiving Pell Grants and nearly 1.5 million more students receiving the maximum award amount compared to awards made in 2023-24 award year.

<sup>34</sup>EFC is a number that helps determine students' eligibility for certain types of federal student aid. This number is calculated using the information that students provide on their FAFSA. Colleges subtract the EFC from students' cost of attending school to determine their need for federal student financial aid. Certain full-time students with an EFC up to \$5,576 could have received some amount of Pell Grant aid in 2020, depending on their cost of attendance.

<sup>35</sup>We previously reported that, according to officials from organizations we interviewed, federal Pell Grant aid does not cover the full cost of college attendance for many students, particularly for those at 4-year colleges or in areas with high costs of living. GAO-19-95.

<sup>36</sup>Some students with an EFC of zero may not receive a Pell Grant because they are enrolled in a short-term program ineligible for federal student aid or may have defaulted on previous student loans, among other reasons. According to Education, students' EFC data captured in the NPSAS came primarily from 2019-20 Pell Grant records in the National Student Loan Data System. For non-Pell recipients, Education used FAFSA data. If EFC was not available from either of these sources, Education officials imputed students' EFC by using the 2019-20 simplified EFC formula and available student data. Some students with imputed EFCs of zero may not have applied for or received federal student aid. The average and 95<sup>th</sup> percentile calculations included imputed EFCs and EFCs equal to zero.

<sup>37</sup>The 95 percent confidence interval for these estimates are (\$223, \$520) and (\$15,609, \$17,116) respectively.

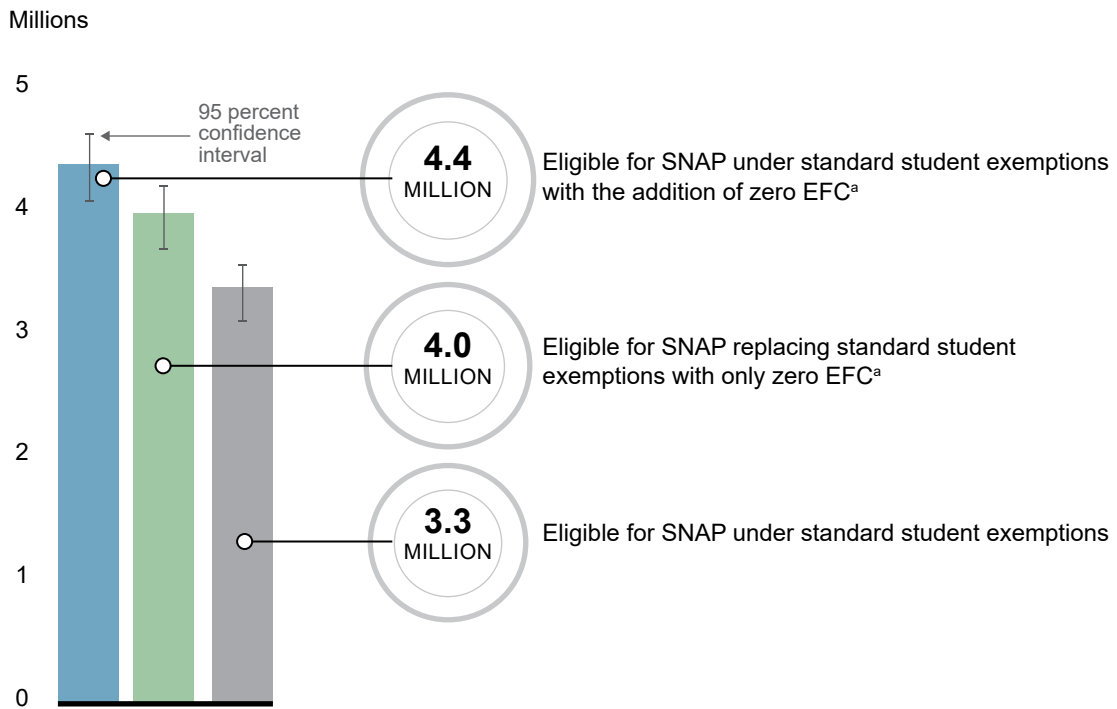
<sup>38</sup>The 95 percent confidence interval for this estimate is (4.1 million, 4.7 million).

<sup>39</sup>This estimate included only those students who were enrolled at least half time, and therefore subject to the SNAP student restrictions.



eligible for SNAP).<sup>40</sup> However, this approach would also lead to an estimated 412,000 students losing SNAP eligibility because their EFC was above zero.<sup>41</sup>

**Figure 11: Estimated College Student Eligibility for Supplemental Nutrition Assistance Program (SNAP) Benefits under Varying Student Exemption Scenarios, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. GAO identified students potentially eligible for SNAP based on characteristics identified in the NPSAS data related to SNAP eligibility. Specifically, GAO looked at whether students had an income at or below 130 percent of the federal poverty level and reported one of the characteristics GAO identified that correspond with a student exemption. GAO did not make any legal determination about actual SNAP eligibility for any individual.

<sup>a</sup>EFC refers to students expected family contribution determined by their Free Application for Federal Student Aid, which informs their federal student aid award calculations.

## Almost 40 Percent of Food Insecure Students Enrolled at Least Half Time in 2020 Were Estimated to Be Potentially Eligible for SNAP Benefits

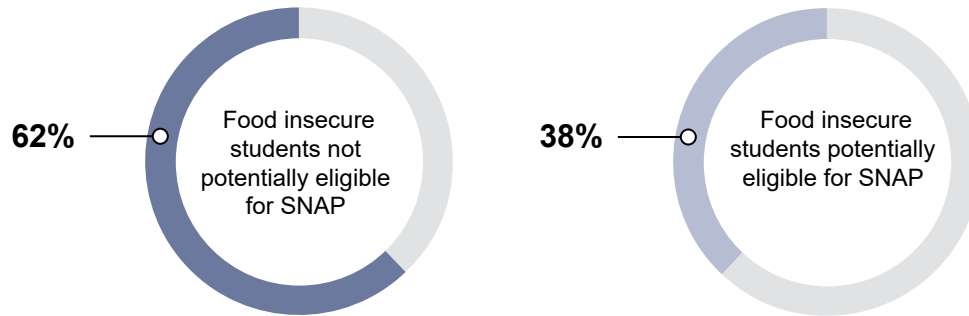
We estimated that among the 3.0 million food insecure students who were enrolled at least half time and therefore subject to the student SNAP restrictions in 2020, 38 percent were potentially eligible for benefits and 62 percent were not eligible (see fig. 12). Food insecure students may not be eligible for SNAP for a variety of reasons. For example, students may have a household income above 130 percent of the federal poverty level or may not meet one of the SNAP student exemptions. Additionally, as previously mentioned, some students who are eligible for SNAP may not appear in

<sup>40</sup>The 95 percent confidence interval for this estimate is (3.7 million, 4.2 million).

<sup>41</sup>The 95 percent confidence interval for this estimate is (377,000, 447,000).

our estimate (e.g., students enrolled in employment and training programs whom we could not identify in the NPSAS data).

**Figure 12: Estimated Eligibility Rate for Supplemental Nutrition Assistance Program (SNAP) Benefits among Food Insecure College Students, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. GAO identified students potentially eligible for SNAP based on characteristics identified in the NPSAS data related to SNAP eligibility. Specifically, GAO looked at whether students had an income at or below 130 percent of the federal poverty level and reported one of the characteristics GAO identified that correspond with a student exemption. GAO did not make any legal determination about actual SNAP eligibility for any individual. These estimates have 95 percent confidence intervals with margins of error of +/- 2 percentage points or fewer.



The relationship between food security and the use of food and nutrition assistance programs is complex. According to a USDA report, households that report using food and nutrition assistance programs in a one-time survey can either be more food secure or less food secure than low-income households not using those programs. Because these programs provide food and other resources to reduce the severity of food insecurity, households are expected to be more food secure after receiving benefits. At the same time, more food-insecure households seek assistance from these programs. After accounting for self-selection, SNAP has been found to generally improve household food security. In 2020, an estimated 45 percent of households that received SNAP benefits were food insecure, and about 42 percent of food-insecure households participated in SNAP.<sup>42</sup>

Source: GAO (icons); USDA (text). | GAO-24-107074

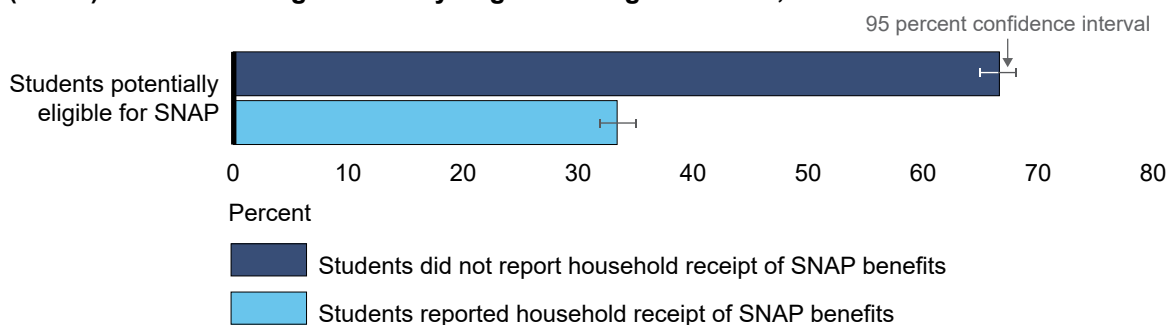
<sup>42</sup>U.S. Department of Agriculture, *Household Food Security in the United States in 2020*.

# Estimate of College Students' Household Receipt of SNAP Benefits

## An Estimated 67 Percent of Students Potentially Eligible for SNAP Did Not Report Receiving Benefits

Of the 3.3 million students we estimated to be potentially eligible for SNAP under the standard student exemptions, an estimated 67 percent—2.2 million students—reported that their household did not receive benefits (see fig. 13).<sup>43</sup> The students who reported receiving benefits may include dependent students who could not use those benefits because they did not live with their parents while in college. In addition, we estimated that approximately 65 percent of financially independent students potentially eligible for SNAP did not report receiving benefits, similar to the estimate for students overall.<sup>44</sup>

**Figure 13: Estimated Household Receipt of Supplemental Nutrition Assistance Program (SNAP) Benefits among Potentially Eligible College Students, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

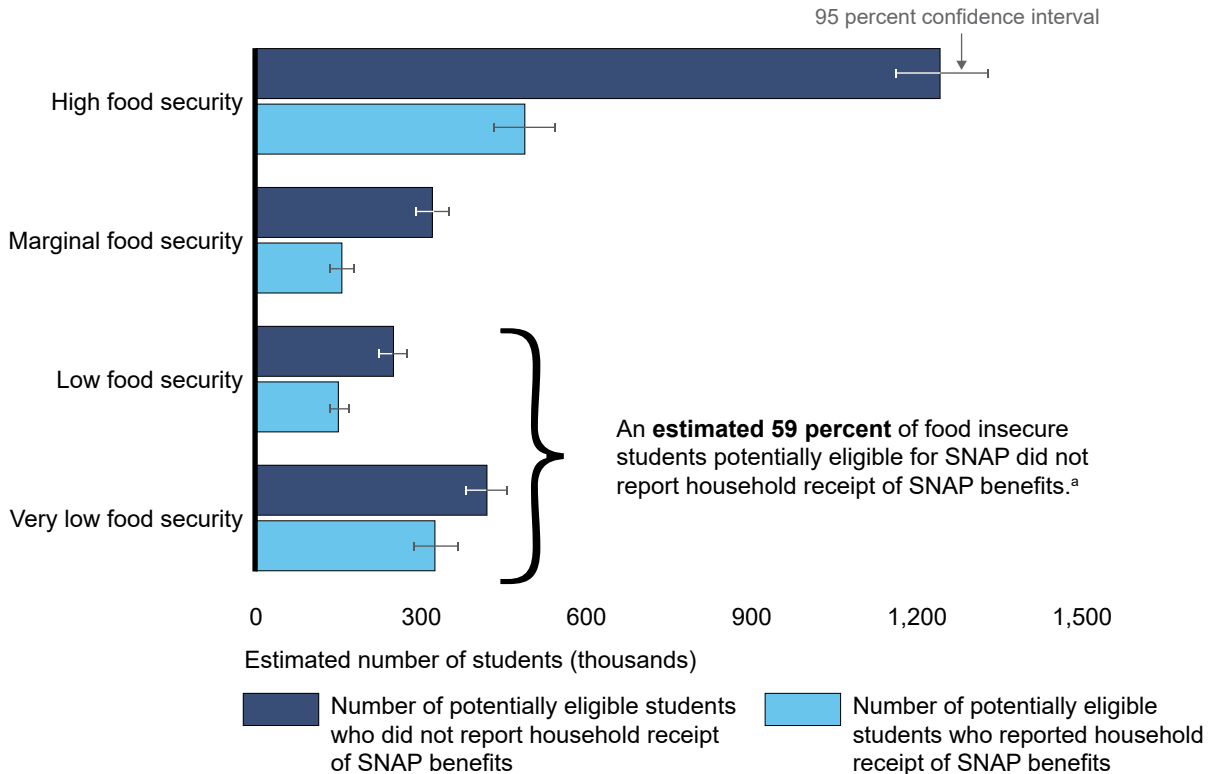
Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. GAO identified students potentially eligible for SNAP based on characteristics identified in the NPSAS data related to SNAP eligibility. Specifically, GAO looked at whether students had an income at or below 130 percent of the federal poverty level and reported one of the characteristics GAO identified that correspond with a student exemption. GAO did not make any legal determination about actual SNAP eligibility for any individual. Participation in SNAP is self-reported through the Free Application for Federal Student Aid and these data are used in the NPSAS.

<sup>43</sup>Education populated this variable on the NPSAS by first referring to the students’ federal financial aid application and then the student survey. The 95 percent confidence interval for this estimate is (2.1 million, 2.4 million).

<sup>44</sup>For federal financial aid purposes, all undergraduates are considered dependent unless they meet certain criteria for independent student status. For example, students are considered independent if they are age 24 or older, married, have dependents other than a spouse, are a veteran or serving on active duty in the military, an orphan, or homeless or at-risk of homelessness. The difference between the percentage of independent students who we estimated to be potentially eligible for SNAP but reported not receiving benefits, is not statistically significant when compared to undergraduate students overall.

Among food insecure students who were potentially eligible for SNAP, we estimated 59 percent (668,000 students) reported that their household did not receive benefits (see fig.14). An additional estimated 320,000 students with marginal food security who were potentially eligible for SNAP did not report receiving benefits (67 percent of those potentially eligible).<sup>45</sup>

**Figure 14: Estimated Supplemental Nutrition Assistance Program (SNAP) Receipt among Potentially Eligible College Students by Food Security Status, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

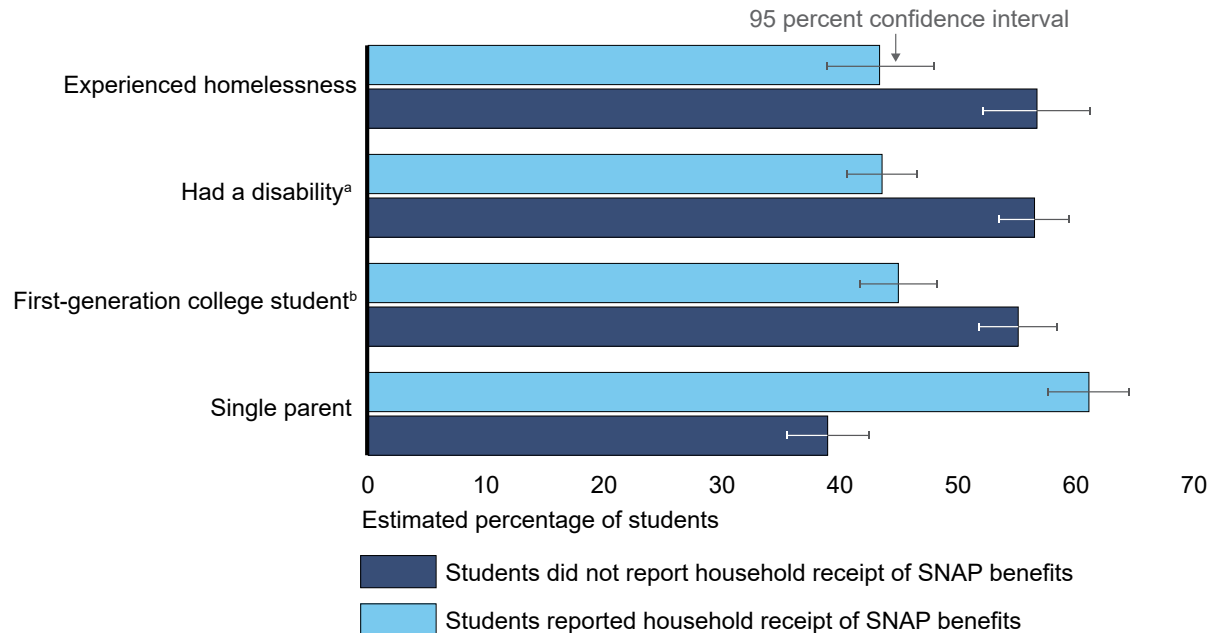
Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. GAO identified students potentially eligible for SNAP based on characteristics identified in the NPSAS data related to SNAP eligibility. Specifically, GAO looked at whether students had an income at or below 130 percent of the federal poverty level and reported one of the characteristics GAO identified that correspond to a student exemption. GAO did not make any legal determination about actual SNAP eligibility for any individual. Participation in SNAP is self-reported through the Free Application for Federal Student Aid and these data are used in the NPSAS.

<sup>a</sup>The 95 percent confidence interval for this estimate is (56, 61).

<sup>45</sup>In our December 2018 report on college student food security, we recommended that the Food and Nutrition Service make information about student eligibility easier to understand and more accessible to students, and to collect and share information about SNAP flexibilities for college students with state SNAP agencies. FNS addressed the recommendations by revising its SNAP student eligibility website to explain eligibility criteria more clearly, and sharing information about SNAP flexibilities with students, college officials, and state agencies. [GAO-19-95](#).

Certain groups of food insecure students who we estimated to be potentially eligible for SNAP reported that their households received benefits at different rates. For example, food insecure single parents reported receipt of benefits at rates higher than other student populations we examined. Yet, we estimated that 39 percent of these potentially eligible single parents did not report receiving benefits (see fig. 15).

**Figure 15: Estimated Percentage of Household Supplemental Nutrition Assistance Program (SNAP) Receipt among Potentially Eligible Food Insecure College Students with Selected Characteristics, 2020**



Source: GAO analysis of 2020 National Postsecondary Student Aid Study data from the U.S. Department of Education. | GAO-24-107074

Notes: “College students” refers to undergraduate students enrolled in 2- and 4-year degree-granting institutions of higher education, and in shorter certificate programs offered by technical training providers. GAO identified students potentially eligible for SNAP based on characteristics identified in the NPSAS data related to SNAP eligibility. Specifically, GAO looked at whether students had an income at or below 130 percent of the federal poverty level and reported one of the characteristics GAO identified that correspond with a student exemption. GAO did not make any legal determination about actual SNAP eligibility for any individual. Participation in SNAP is self-reported through the Free Application for Federal Student Aid and these data are used in the NPSAS.

<sup>a</sup>Students self-report their disability status.

<sup>b</sup>Education determined first generation college student status based on whether students reported that their parents attended college.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the Secretary of Education and appropriate congressional committees. In addition, this report is available at no charge on the GAO website at <https://www.gao.gov>. If you or your staff members have any questions about this report, please contact me at (202) 512-7215 or [larink@gao.gov](mailto:larink@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.

Kathryn A. Larin, Director  
Education, Workforce, and Income Security Issues



# Objectives, Scope, and Methodology

This report describes what Education's 2020 National Postsecondary Student Aid Study (NPSAS) data show about food insecurity among college students and their access to SNAP benefits. These data provide the first nationally representative information about college student food insecurity. Our analysis and its limitations are described in more detail below.

## NPSAS Data Analysis

We analyzed data from the Department of Education's 2020 National Postsecondary Student Aid Study (2020 NPSAS).<sup>46</sup> NPSAS data contain nationally representative, detailed demographic and financial aid data for college students enrolled in less than 2-year, 2-year, 4-year, and graduate postsecondary programs. These data come from institutional records, government databases, and student surveys. Because the NPSAS data are based on samples, estimates are calculated using the appropriate sample weights provided that reflect the sample design. Each of these samples follows a probability procedure based on random selection, and they represent only one of a large number of samples that could have been drawn. Since each sample could have provided different estimates, we express our confidence in the precision of our particular sample's results as a 95 percent confidence interval. This is the interval that would contain the actual population value for 95 percent of the samples we could have drawn. Unless otherwise noted, all percentage estimates from the NPSAS data analysis have 95 percent confidence intervals with margins of error of +/- 4 percentage points or fewer. We compared 95 percent confidence intervals to identify statistically significant differences between specific estimates.

The information provided in the NPSAS data, particularly those from the survey portion of the study, are self-reported and not all the data are based on federal determinations or cross-verified with outside sources. For example, students self-report their disability status and their hours worked. Such self-reported data are subject to several sources of nonsampling error. Nonsampling errors can influence the accuracy of information presented in the report, although the magnitude of their effect is not known.

The 2020 NPSAS survey was fielded starting in March 2020, just as the COVID-19 pandemic was spreading though the U.S. and a national emergency was declared. At this time, many students and institutions were in a period of flux and uncertainty because of the pandemic. Many students faced various personal and financial challenges during this time and some left college altogether.<sup>47</sup>

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<sup>46</sup>Education collects NPSAS data by academic year. Consistent with its naming convention, in this report, we refer to the NPSAS study that collected data from the 2019–2020 academic year as the 2020 NPSAS. The 2020 NPSAS student survey component collected information on students enrolled in postsecondary education during the 2019–2020 academic year, however, the survey was administered between March 2020 and January 2021.

<sup>47</sup>According to Education an estimated 88 percent of students experienced a disruption or change in their enrollment in response to the pandemic. An estimated 4 percent of students withdrew from their institution and another 4 percent took a leave of absence. An estimated 40 percent of students experienced a financial or personal disruption. M. Cameron, T.A. Lacy, P. Siegel, J. Wu, A. Wilson, R. Johnson, R. Burns, and J. Wine. (2021). 2019–20 National Postsecondary Student Aid Study (NPSAS:20): *First Look at the Impact of the Coronavirus (COVID-19) Pandemic on Undergraduate Student Enrollment, Housing, and Finances* (Preliminary Data) (NCES 2021-456). U.S. Department of Education. Washington, DC: National Center for Education Statistics. Retrieved November 17, 2023 from <https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2021456>.

# Measure of Student Food Security

The 2020 NPSAS survey component included 10 questions to assess students’ food security. According to the 2020 NPSAS Codebook, these 10 survey questions were taken from the U.S. Department of Agriculture’s (USDA) U.S. Adult Food Security Survey Module. These questions asked students to think only about the last 30 days when responding to these questions.<sup>48</sup> Responses of “yes,” “often,” “sometimes,” or responses of “3 days or more” for items measuring frequency are coded as affirmative. The sum of affirmative responses to the 10 questions is the student’s score on the scale. See Table 1 for information about how the NPSAS scored the severity of students’ food security status.

**Table 1: Department of Education’s National Postsecondary Student Aid Study (NPSAS) Food Security Status**

	NPSAS Score (i.e., Number of affirmative responses)
<b>High food security:</b> Households had no problems or anxiety about consistently accessing adequate food.	0
<b>Marginal food security:</b> Households had problems at times, or anxiety about, accessing adequate food, but the quality, variety, and quantity of food intake were not substantially reduced.	1-2
<b>Low food security:</b> Households reduced the quality, variety, and desirability of their diets, but the quantity of food intake and normal eating patterns were not substantially disrupted.	3-5
<b>Very low food security:</b> At times household eating patterns were disrupted and food intake reduced because the household lacked money and other resources for food.	6-10

Source: 2020 NPSAS Documentation and U.S. Department of Agriculture Adult Food Security Scale. | GAO-24-107074

## Identification of Students Who Potentially Met a SNAP Exemption

Using NPSAS data, we identified students who were enrolled in school at least half time, as these are the individuals subject to the SNAP student restrictions and must meet a student exemption to receive benefits.<sup>49</sup> We then narrowed this group of students to include only those whose household income was at or below 130 percent of the federal poverty level, which is the standard income requirement to qualify for SNAP benefits for households that do not include a member who is 60 years of age or

<sup>48</sup>According to Education officials, because the food security survey questions ask students to think only about the previous 30 days, 70 percent of student responses refer to a time period following the 2020 NPSAS academic year (i.e., July, 1 2019—June, 30 2020); therefore, students’ food security responses do not precisely align with other enrollment information collected in the 2020 NPSAS.

<sup>49</sup>We used the NPSAS variable that measures student’s attendance intensity during the 2019-20 academic year. This variable indicates whether students were exclusively enrolled full time, half time, less than half time, or some combination of these from July 2019-June 2020. An estimated 12.8 million undergraduate students (95 percent confidence interval for this estimate is 12.1 million, 13.5 million) and 2.5 million graduate students (95 percent confidence interval for this estimate is 2.3 million, 2.8 million) were enrolled either exclusively full time, exclusively half time, or a combination of full time and half time throughout the year. This estimate excludes students who were enrolled less than half time for one month or more. Our analysis also excludes foreign and international students.

older or disabled.<sup>50</sup> Income data in NPSAS use information submitted on students' Free Application for Federal Student Aid (FAFSA) as the primary source. However, for students who did not file a FAFSA, income is based on self-reported data from the student survey.

Among this population of low-income students, we identified those who met at least one of the SNAP student exemptions that we could identify using variables from the 2020 NPSAS data.<sup>51</sup> NPSAS data contain several variables that match up closely with certain student eligibility exemptions, however there are notable limitations (see table 2). The NPSAS data does not contain a variable to capture the student eligibility exemption related to enrollment in certain programs aimed at employment, such as the Workforce Innovation and Opportunity Act or Temporary Assistance for Needy Families employment and training programs. Therefore, we could not identify any students who met this eligibility exemption for SNAP, leading us to underestimate the number of students who would be potentially eligible for SNAP under this exemption. Other limitations may have led us to overestimate the number of students appearing to meet an eligibility exemption (e.g., the exemptions related to disability and the availability of childcare, for which the NPSAS variables do not perfectly align with the SNAP student exemptions).

**Table 2: Supplemental Nutrition Assistance Program (SNAP) Eligibility Exemptions for College Students and Corresponding Variables in the 2020 National Postsecondary Student Aid Study (NPSAS)**

College student SNAP exemption	NPSAS variable	Variable description and limitations
Under age 18 or age 50 or older <sup>a</sup>	AGE	This variable provides the student's age as of 12/31/2019.
Parent caring for a child under age 6	DEPCHILD, DEPYNG	DEPCHILD indicates whether the student had dependent children. DEPYNG provides the age of the student's youngest child during the 2019-20 academic year.
A parent who is caring for a child aged 6 to 11 and is unable to obtain childcare to attend school and work	DEPCHILD, DEPYNG, DEPCARE	This combination of variables indicates whether the student had dependent children in paid childcare during the 2019-20 academic year. Students who have a child between 6 and 11 and indicate they did not have paid childcare were identified as meeting this exemption. However, some individuals may have unpaid childcare that allows them to work and attend school, which these variables do not capture.

<sup>50</sup>7 C.F.R. § 273.9(a)(1)(i). Household gross income at or below 130 percent of the federal poverty level (FPL) is the standard income requirement to qualify for SNAP benefits for households that do not include a member who is 60 or older or disabled. As of January 2024, 44 states (including states, territories, and the District of Columbia) implemented broad-based categorical eligibility for SNAP, which generally allows households with incomes below a state-determined threshold (no more than 200 percent FPL) to be eligible for SNAP. For households not categorically eligible for SNAP, in most cases households must meet both gross and net income requirements, meaning most households must have a net income at 100 percent of the FPL after applying deductions (e.g., medical expenses, childcare, etc.). In fiscal year 2020, USDA estimated that about 1.5 percent of SNAP benefits went to households with gross income at or above 131 percent of the federal poverty level. U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2020*, by Kathryn Cronquist and Brett Eiffes. Project Officer, Kameron Burt. Alexandria, VA, 2022.

<sup>51</sup>Individuals enrolled at least half time at a college, but in a program outside of the regular curriculum or in a program that does not require a high school diploma or equivalent, are not considered enrolled in an Institute of Higher Education (IHE) and, therefore, do not need to meet a SNAP student exemption. These can include remedial education, continuing or community education, professional development, English for Speakers of Other Languages, and workforce development or training programs. The available data do not allow us to exclude students enrolled in these programs from our estimate of SNAP eligibility.

A single parent enrolled full-time caring for a child under age 12	SINGLPAR, DEPYNG, ATTNPT	These variables indicate students' single parent status, age of their youngest child, and whether they are enrolled full time.
Working a minimum of 20 hours per week	JOBHOUR	This variable indicates the number of hours worked per week while enrolled, excluding work-study and fellowships, during the 2019-2020 academic year. This variable identifies the number of hours worked at the student's job with the highest number of hours reported. It does not account for the total number of hours worked for students with more than one job during the same period.
Receiving any federal work-study funds	TFEDWRK	This provides the amount of federal work-study awarded for the 2019-20 academic year. This does not include state-awarded work-study.
Receiving Temporary Assistance for Needy Families (TANF) benefits	FEDBEND	This variable indicates whether any member of the student's household received Temporary Assistance for Needy Families (TANF) benefits during the 2017 or 2018 calendar year.
Not physically or mentally fit (e.g., have a disability)	DISABLE	This variable indicates whether a student has a long-lasting condition such as serious difficulty hearing, blindness or serious difficulty seeing, difficulty concentrating, remembering, or making decisions, or serious difficulty walking or climbing stairs. Education officials said that students' responses are self-reported and cannot be confirmed using available administrative sources. This variable is not based on a federal disability determination.
Enrolled in certain programs aimed at employment, including TANF work programs, Workforce Innovation and Opportunity Act Title I programs, and others	N/A	No corresponding NPSAS variables.

Source: GAO analysis and 2020 National Postsecondary Student Aid Study Documentation. | GAO-24-107074

Notes: Individuals enrolled at least half time at a college, but in a program outside of the regular curriculum or in a program that does not require a high school diploma or equivalent, are not considered enrolled in an institute of higher education and, therefore, do not need to meet a SNAP student exemption. These can include remedial education, continuing or community education, professional development, English for Speakers of Other Languages, and workforce development or training programs. The available data did not allow us to exclude students enrolled in these programs from our estimate of SNAP eligibility.

<sup>a</sup>In 2023 a modification to the SNAP age-based work exemption was enacted, which is applicable to college students and other adults. Between fiscal year 2023 and 2025 the age at which individuals will be exempt from the work requirement will increase from 50 to 55. Fiscal Responsibility Act of 2023, Pub. L. No. 118-5, tit. II, § 311, 137 Stat. 10, 36.

We also analyzed how adding students who had a zero expected family contribution (EFC) to the list of student SNAP exemptions affected the number of students we estimated to be potentially eligible for benefits. Education officials told us that for respondents who did not file a FAFSA, Education calculates an EFC for those students based on a simplified formula using available income and other information. Since Education does not have access to information about household assets for these students, Education's calculated EFC may be underestimated, particularly in cases where the student or dependent student's parents have a low income but high assets.

Additionally, SNAP eligibility for college students not only depends on income and meeting a student exemption, but also on other determinations such as the level of the individual's financial assets and any state policy waivers that may apply to the individual's eligibility. Given that our analysis relied on self-reported information, and we did not capture all aspects of student SNAP eligibility, we did not make any legal determinations about whether individuals were eligible for SNAP.

## Estimate of Students' Household Receipt of SNAP Benefits

To estimate receipt of SNAP benefits we used a NPSAS variable that indicates whether any member of the student's household received SNAP benefits during the 2017 or 2018 calendar year.<sup>52</sup> To populate this variable, Education first referred to students' FAFSA and then the student survey. SNAP benefits included in this variable are not always received by the individual student. This is the case particularly for students who are considered to be dependent students but may not be living with or preparing meals with their family members who received the SNAP benefits.<sup>53</sup>

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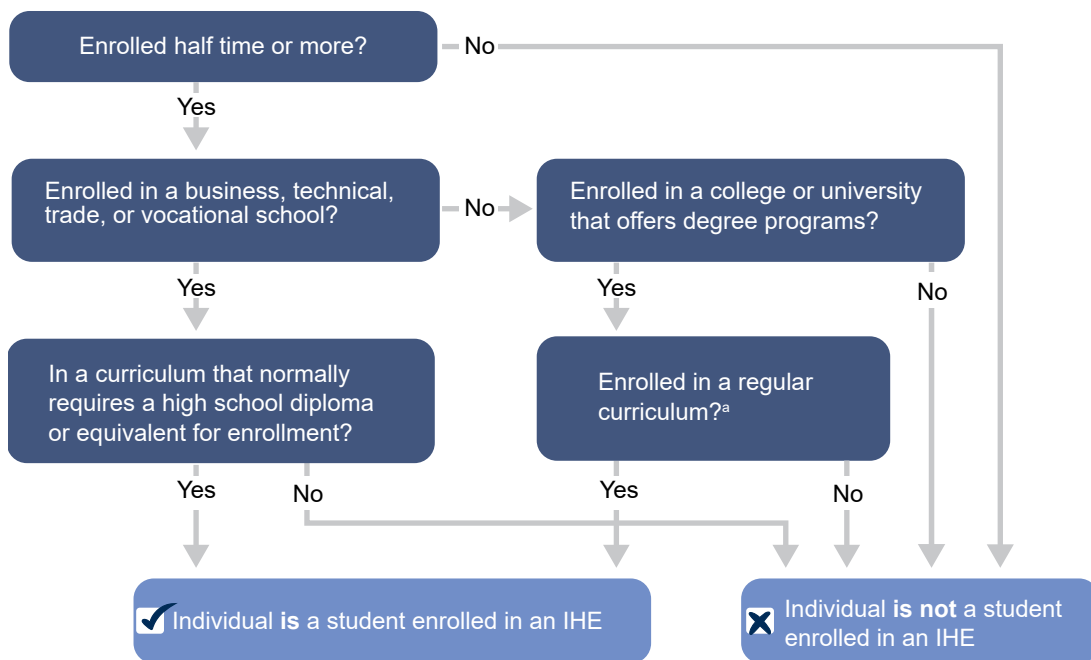
<sup>52</sup>The 2019-2020 FAFSA form that was used to populate this variable in the 2020 NPSAS asks applicants to indicate if at any time during 2017 or 2018 anyone in their household received SNAP benefits. These are the most recent NPSAS data available.

<sup>53</sup>For federal financial aid purposes, all undergraduates are considered dependent unless they meet certain criteria for independent student status. For example, students are considered independent if they are age 24 or older, married, have dependents other than a spouse, are a veteran or serving on active duty in the military, an orphan, or homeless or at-risk of homelessness.

# Food and Nutrition Service Rules for Determining Which Students are Subject to SNAP Restrictions

According to the U.S. Department of Agriculture’s Food and Nutrition Service, this flowchart illustrates how to determine whether an individual is considered enrolled in an institute of higher education and, therefore, subject to the student SNAP eligibility rules.<sup>54</sup>

**Figure 16: How to Determine Whether an Individual Is Enrolled in an Institution of Higher Education (IHE) for SNAP Eligibility Purposes**



Source: U.S. Department of Agriculture Food and Nutrition Service. | GAO-24-107074

Note: The Food and Nutrition Service issued a policy memo on February 7, 2023 with information on determining which students are subject to Supplemental Nutrition Assistance Program (SNAP) eligibility rules.

<sup>a</sup>Many colleges offer special programs that are not part of the regular curriculum. These can include remedial education, continuing or community education, professional development, English for Speakers of Other Languages, and workforce development or training programs.

<sup>54</sup>7 C.F.R. § 273.5(a).



## GAO Contacts and Staff Acknowledgments

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### Staff Acknowledgments

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