



# Young People and Nutrition Assistance

## Supplemental Nutrition Assistance Program

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*February 2021*

The transition from adolescence to young adulthood can be a time of opportunity and promise, as young people who have the supports they need to smoothly make this transition can gather knowledge, experience, and skills to become independent. As the fallout from the COVID-19 pandemic continues to affect families nationwide, now more than ever young people with low incomes face significant barriers to stability and mobility, such as high rates of poverty, employment instability, and disconnection from both school and work (Parker, Minkin, and Bennett 2020; Aaronson and Alba 2020; Lewis 2020). To finish school and training and get connected to a successful pathway, young people must be able to meet their basic needs for food, shelter, cash, and health care.

This brief is part of a series focused on how well major federal safety net programs serve young people—defined as those ages 14 to 24. The series pays special attention to young people who live independently. Information was obtained from literature and interviews with safety net and youth policy experts as well as youth-serving practitioners.

This brief focuses on the circumstances under which young people ages 14 to 24 are able to access Supplemental Nutrition Assistance Program (SNAP)—the largest federal nutrition assistance program—and what is known about the program’s effectiveness for this population. It is an initial exploration of issues relevant to young people, based on a quick review of literature and conversations with experts. Though we focus on information relevant to young people, it may be useful to other age groups as well.

## Key Takeaways

- **Ensuring access to food and good nutrition is fundamental to young people’s ability to thrive.** Yet far too many young people face food insecurity—a lack of dependable access to food—undercutting their ability to explore and seize opportunities to successfully transition into adulthood and placing their health and development at risk.
- **The Supplemental Nutrition Assistance Program (SNAP) is a widely available federal support that helps young people afford food and reduces food insecurity.** SNAP, unlike many other federal supports, is available to most individuals who meet income and asset criteria, including both single people and families.
- **There are some important ways in which SNAP does not effectively meet young people’s needs:**
  - » inadequacy of the benefit to meet young people’s nutritional needs
  - » gaps in the extent to which some groups of young people can get SNAP, including some immigrants, some college students, some young people with drug felonies, and some young people in foster care
  - » work requirements as a condition of receiving benefits that can limit participation, though these requirements have been suspended during the COVID-19 health emergency
- **SNAP could better meet young people’s needs** if it raised benefit levels, eliminated eligibility gaps for subgroups of young people, implemented more cross-systems collaboration in administering benefits, and enacted flexibilities that account for the circumstances of young people’s lives—income volatility, complicated family circumstances and housing arrangements, and challenges meeting programmatic expectations such as paperwork and other enrollment requirements

## What Is SNAP, and What Roles Does It Play in Meeting Young People’s Needs?

The transition from adolescence to adulthood can be a time of exciting exploration. Yet for young people whose families and communities have fewer resources to support this transition, food insecurity is common. These challenges arise, at least in part, from systemic barriers disproportionately affecting young people of color that lead to reduced access to well-paying jobs and community resources.<sup>1</sup> Although no national data exist on the extent of food insecurity among adolescents and young adults ages 14 to 24, a national study suggests that roughly one in six children younger than 18 were experiencing food insecurity before the pandemic and that this has increased to just under one in four now (Feeding America 2020; Waxman, Gupta, and Gonzalez 2020). The overall food insecurity rate in September 2020 was about 20 percent (Waxman, Gupta, and Gonzalez 2020). The food insecurity rate among school-age young people of color is significantly higher—nearly 40 percent (Gupta, Gonzalez, and

Waxman 2020). Some data provide insights on levels of food insecurity for young adults. For example, and a study of 18- to 26-year-olds in the Minneapolis/St. Paul area before the pandemic found as many as one in four experienced hunger, a number that has likely grown because of economic conditions (Larson, Laska, and Neumark-Sztainer 2020).

Food insecurity among young people is a critical problem to solve because it can create barriers to the healthy development of young people and can carry long-term negative consequences. It has been linked to health problems such as higher blood pressure and prediabetes, poor diet quality and less availability of healthy foods, and risky behaviors (Kirkpatrick, McIntyre, and Potestio 2010; Whitaker, Phillips, and Orzol 2006; McLaughlin, et al. 2012).<sup>2</sup> One study found that adolescents in food-insecure families routinely work to bring food into the household or go without food to protect their younger siblings. Some adolescents who face serious food deprivation may engage in risky behavior to obtain food for themselves or their families (Galvez et al. 2016). Food insecurity is also associated with suicidal ideation and other mental health disorders in young people (Alaimo et al. 2002; McLaughlin et al. 2012).

As the main program responsible for providing food security to individuals and families with low incomes in the US, the federal SNAP program helps participants afford a nutritionally adequate diet by providing individuals and families with an electronic benefits transfer (EBT) card loaded with a monthly benefit amount that can be used to purchase food at authorized retailers. Preliminary data suggest that about 43 million households were receiving SNAP benefits in August 2020, an increase of 6 to 7 million since just before the pandemic began in February 2020.<sup>3</sup> The average monthly benefit that families received was \$258 in 2019, though this is likely higher now because of pandemic-related benefit increases.<sup>4</sup>

Though little research exists on the impacts of SNAP for young people ages 14 to 24, ample evidence shows that SNAP positively affects the health and well-being of children under age 18 (Carlson et al. 2016). Research on the impacts of SNAP on families overall finds clear links to reductions in food insecurity, reduced poverty, and better health outcomes (CBPP 2018). One study found that child poverty rates could be reduced by more than 2 percent if SNAP benefits were expanded to account for adolescents' needs and were increased during the summer when students are out of school (National Academies 2017).

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## BOX 1

### Characteristics of Young People

Although adolescence is a time of great strength and tremendous potential for growth, many characteristics of young people heighten their need for assistance while also creating challenges for obtaining and keeping support from safety net programs.

#### **Brain Development**

Adolescence is a time when young people learn about and adapt to the world around them. It is a time of significant brain development but still a time when critical cognitive skills that affect decisionmaking are not fully developed. Young people are more likely to engage in exploratory behaviors that involve taking

risks, which can be positive ways to explore the world when in a supportive environment, but in other situations can lead to criminal legal system involvement and other adverse outcomes that make it difficult for young people to achieve stable employment or access safety net programs. Young people also have a developmental need to feel accepted, which means they may be easily discouraged from applying for safety net programs after having a negative experience with a caseworker. This need can also mean that stigmas attached to specific benefit programs may persuade them not to apply.

### ***Complex and Dynamic Family Relationships***

Family relationships can be much more complex than accounted for in safety net policies, making it hard for young people to meet requirements. Young people may have more than one home or family they connect to; they may live with relatives other than their parents; they may be in and out of their family home; or they may have become estranged from their parents because of abuse or conflict over gender identity or sexual orientation (Samuels et al. 2019). Each of these realities can create challenges for their ability to meet program requirements that assume a simpler family situation.

### ***Poverty***

Young adults face the highest poverty rates of any age group. The spike in poverty among people ages 18 to 24 is apparent not only when measured using the official poverty measure but is even more pronounced when using the supplemental poverty measure, which considers necessary expenses and receipt of public benefits.<sup>a</sup> Although official pandemic-era poverty rates are not yet available, other indicators of hardship suggest that youth poverty rates have risen since the pandemic began (Giannarelli, Wheaton, and Acs 2020).<sup>b</sup> Poverty rates are especially high among young parents and young people with a history of child welfare and criminal legal system involvement. Black and Latinx young people also experience higher rates of poverty than their white peers, reflecting the effects of structural racism.

### ***Employment Instability***

Adolescents and young adults face greater challenges in the labor market than somewhat older adults. Young people ages 18 to 24 made up roughly a quarter of the low-wage workforce before the crisis, and an outsized share worked in the gig economy (Ross and Bateman 2019).<sup>c</sup> Young people ages 16 to 24 had higher unemployment rates than adults ages 25 to 44 before the pandemic (9 percent compared with 4 percent), and they remained higher as of August 2020 (14 percent compared with 8 percent).<sup>d</sup> During the pandemic, the labor market prospects of adolescents and young adults (ages 16 to 29) have been particularly hard hit, in part because young people were more likely to be employed by industries most negatively affected by the pandemic. Black and Latinx young people as well as young people with lower levels of education experienced the greatest losses. Employment instability can make it more challenging for young people to comply with program rules that require them to report any changes in income, and temporary increases in income can make them ineligible when they still need help.

### ***Housing Instability***

Residential mobility is highest among young people ages 20 to 29, with almost one in four moving within the past year.<sup>e</sup> In addition, roughly 1 in 30 adolescents ages 13 to 17 and 1 in 10 young adults ages 18 to 25 experience homelessness each year. Housing insecurity is likely to have risen since the pandemic began (Samuels et al. 2019; Lake 2020). Youth housing instability makes it harder to provide proof of residency for safety net programs or to communicate with benefit administrators through mail and indicate a permanent address on applications.

### ***Inexperience with Bureaucracy***

Young people may not know about safety net programs and may be even less likely than other adults to have the experience and ability to navigate the notoriously challenging logistical and paperwork demands of accessing and maintaining safety net benefits, including completing lengthy forms, meeting scheduled appointments, or accessing personal documents like a Social Security card or medical

records. Young people may also experience difficulty navigating paper forms often required to apply for programs, which they are less likely to have experience interacting with than older adults.

**Sources:** Conversations with youth-serving practitioners and other experts. Aaronson and Alba 2020; Parker, Minkin, and Bennett 2020; National Academies 2019.

<sup>a</sup>Liana Fox, “What Is the Supplemental Poverty Measure and How Does it Differ from the Official Measure?,” United States Census Bureau, September 6, 2018, [https://www.census.gov/newsroom/blogs/random-samplings/2018/09/what\\_is\\_the\\_suppleme.html](https://www.census.gov/newsroom/blogs/random-samplings/2018/09/what_is_the_suppleme.html).

<sup>b</sup>“POV-01. Age and Sex of All People, Family Members and Unrelated Individuals,” United States Census Bureau, 2019, [https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pov/pov-01.html#par\\_textimage\\_10](https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pov/pov-01.html#par_textimage_10); “Tracking the COVID-19 Recession’s Effects on Food, Housing and Employment Hardships,” Center on Budget and Policy Priorities, December 16, 2020, <https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-recessions-effects-on-food-housing-and>.

<sup>c</sup>Kisha Bird and Lashon Amado, “Next Coronavirus Package Must Do More for Youth and Young Adults,” *Center for Law and Social Policy* (blog), March 27, 2020, <https://www.clasp.org/blog/next-coronavirus-package-must-do-more-youth-and-young-adults>.

<sup>d</sup>“Employment During COVID-19,” Youth.gov, September 15, 2020, <https://youth.gov/youth-topics/employment-during-covid-19>.

<sup>e</sup>“Many Young Adults Lack Financial Literacy, Economic Stability, Study Finds,” *Science Daily*, August 24, 2018, <https://www.sciencedaily.com/releases/2018/08/180824135007.htm>; Riordan Frost, “Who Is Moving and Why? Seven Questions About Residential Mobility,” Joint Center for Housing Studies of Harvard University, May 4, 2020, <https://www.jchs.harvard.edu/blog/who-is-moving-and-why-seven-questions-about-residential-mobility>.

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## Challenges and Opportunities for Young People in Accessing SNAP

To assess how well SNAP meets the needs of young people, it is useful to examine three questions: Are young people eligible and under what circumstances? How well do the benefits and services meet young people’s needs? How easy is it for young people to get and keep these services? Each of these questions is examined below.

### Are Young People Eligible and Under What Circumstances?

#### ELIGIBILITY OPPORTUNITIES FOR YOUNG PEOPLE

SNAP is relatively widely available to young people with low incomes in comparison with other programs:

- SNAP is generally available to individuals whose gross income is below 130 percent of the federal poverty level (FPL), net income is below FPL, and whose assets are below strict requirements (though many states have relaxed the asset requirements).<sup>5</sup>
- Most young people living with their parents must continue to receive benefits in the same SNAP household until they are 22, though generally they can apply on their own once they reach 18 if they are outside of their parent’s home.<sup>6</sup>

- **Some young people can get SNAP on their own even before age 18**—for example, homeless adolescents can apply on their own.<sup>7</sup>
- Finally, 43 states have **rules that make individuals automatically eligible for SNAP if they qualify for federal or state-funded Temporary Assistance for Needy Families (TANF) benefits**, so young adults who qualify for TANF-funded programming would be able to automatically qualify for SNAP in those states.<sup>8</sup>

## ELIGIBILITY GAPS FOR YOUNG PEOPLE

Not all young people who are income eligible are able to receive SNAP, and others may face limits on how long they can get SNAP benefits.

- **Immigrant young people.** Undocumented immigrants are generally ineligible for SNAP, as are legally present noncitizens if they have been living in the US for fewer than 5 years (some exceptions exist, including refugees, asylees, and those with certain military connections). However, noncitizen minors meeting certain qualifications can receive benefits without a waiting period.<sup>9</sup>
- **Students enrolled in higher education.** Most able-bodied students older than 18 enrolled in higher education at least half time are not eligible for SNAP benefits unless they meet additional eligibility criteria such as working at least 20 hours a week, participating in a work study program, or taking care of a young child. States vary in how accessible they make SNAP for college students who meet any of these exemptions.<sup>10</sup> This became a critical issue during the pandemic as colleges moved to virtual learning and campus jobs were lost, and in response Congress temporarily removed these additional work and eligibility requirements for students in late 2020.<sup>11</sup>
- **Young people with drug felony convictions.** Young people convicted of drug felonies may be ineligible, though most states have opted out of the restriction or imposed less severe restrictions through a modified ban (e.g., imposing a temporary restriction, requiring participation in a treatment program).<sup>12</sup>
- **Young people in foster care.** Young people in foster care are excluded from SNAP households unless the head of household requests their inclusion. If they are included, foster care payments will be counted as income; therefore, it is often best for the family not to request their inclusion (Fremstad 2012). Young people in foster care may not participate in SNAP independently.<sup>13</sup>
- **Work requirements.** In addition, many young people must also meet work requirements to access SNAP benefits.
  - » With some exceptions, young people ages 16 and older must register for work; participate in SNAP Employment and Training or workfare if assigned by the state SNAP agency; and take a suitable job if offered and not quit or reduce their work hours below 30 a week without good reason. Young people may be excused for various reasons, including if they are taking care of a child under 6 or an

incapacitated person, participating in alcohol or drug treatment, or studying in high school at least half time.

- » Young people ages 18 and older who do not have dependents or disabilities are limited to receiving SNAP for three months in a three-year period unless they meet additional work reporting requirements, including documenting that they are working or participating in a work program at least 80 hours a month.
- » States may extend work requirements to other SNAP households or seek waivers of the 3-month time limit for able-bodied adults without dependents (ABAWDs) in areas with high unemployment rates or insufficient numbers of jobs available.<sup>14</sup>

## COVID-19 EFFECTS ON ELIGIBILITY AND ACCESS

Several federal and state actions have affected eligibility and access to SNAP during the pandemic.

- The Families First Coronavirus Response Act allowed the federal government increased authority to allow states to make it easier for people to apply, qualify for, and maintain SNAP benefits. All states have also used the option that the Act provided to give many SNAP households additional benefits up to the maximum amount they can receive, as well as meal replacement benefits for children who attend a school closed because of health conditions and who would have received free or reduced-price meals (called Pandemic-EBT, or P-EBT).<sup>15</sup>
- Additionally, for the duration of the public health emergency, the Act suspends the three-month time limit for ABAWDs who are not working unless the state offers a qualifying training activity to all subject to the time limit.<sup>16</sup>
- In December 2020, Congress passed a COVID relief bill that provided a 15 percent increase in SNAP benefits for six months and expanded the P-EBT program to serve families with young children.<sup>17</sup>
- Nearly all states are participating in a SNAP online purchasing pilot.<sup>18</sup> Generally, SNAP participants are required to swipe their EBT card and enter a PIN, making it impossible for them to purchase food without personal contact. In early 2020, the pilot had been implemented as planned in a few states, but the pilot was expedited given the social distancing needs of the COVID-19 pandemic, allowing all states the opportunity to join the pilot. Most states only have a few authorized retailers participating, so online access remains limited.

## How Well Do the Benefits and Services Meet Young People's Needs?

SNAP is widely available compared with other benefits, but benefit levels are largely inadequate to meet young people's needs.

- One strength of SNAP in supporting adolescents and young adults is that it is an **entitlement program**, meaning services are available for anyone deemed eligible for services—though, as noted above, gaps in coverage exist that leave some young people uncovered.

- However, numerous **concerns exist about the adequacy of the benefit amounts** to meet young people's nutritional needs. First, research before the pandemic suggests that SNAP benefits are generally inadequate, as the average cost of a low-cost meal is 27 percent higher than the maximum SNAP benefit level, and the benefits do not cover the cost of such a meal in 99 percent of US continental counties (Waxman, Gundersen, and Thompson 2018). Second, the benefit levels do not recognize the significantly higher food consumption levels of adolescents and young adults.<sup>19</sup>
- Further, although states have taken advantage of flexibilities under pandemic legislation to respond to increased need for food aid, the **need continues to greatly outstrip help provided to people struggling to afford food**. More than 1 in 10 adults reported on recent Census survey that their household had at least sometimes lacked enough food to eat in the past week, a large increase compared with prepandemic levels.<sup>20</sup> The USDA has interpreted the Families First Act narrowly, not allowing states to provide additional assistance to the households with the lowest incomes who were already receiving the maximum benefit level and who are likely to have the highest need for additional support.<sup>21</sup>

## How Easy Is It for Young People to Get and Keep SNAP?

According to our interviews with experts and practitioners, on-the-ground experience suggests that SNAP is more accessible than some other major federal supports. That said, access challenges are still common for youth heads of household (as well as for people of all ages).

Some aspects of SNAP make it relatively easier to get than other benefits:

- **SNAP is more widely known than some other benefits.**
- Unlike some other programs that employ waiting lists, **SNAP agencies are obligated to assist all eligible applicants.**

On the other hand, there are several ways that SNAP does not reflect the complex realities and characteristics of young people's lives, their developmental stage, or their strengths (see box 1 for more information on the characteristics of young people), making it more challenging for them to access SNAP benefits. For example, this group may struggle with the following:

- **knowing SNAP exists and they may be able to apply for it on their own**
- **accessing the documentation and information that they need**, including their own paperwork and Social Security card as well as income verification from their employers, particularly given the jobs young people often have (e.g., part-time, paid in cash, multiple jobs)
  - » **personal paperwork can be particularly challenging** for young people who have left home and may not have close relationships with their families
  - » they may **struggle to correspond by mail** when addresses change or they have no permanent address



- **navigating the eligibility determination process** (including interacting with a caseworker), particularly if they are currently included in the household of a parent or guardian for benefit purposes
- **meeting work or training requirements to get benefits at age 16 or older and maintain benefits as an able-bodied adult participant without dependents**
  - » **the typical instability and variability in work hours for young people heighten their risk of losing SNAP** if their work hours fall below the required level; those meeting the work requirements may still have difficulty documenting their compliance, such as accurately reporting their work hours (Phillips 2016)
  - » research suggests **program administration of the SNAP work-related time limit is complicated and error prone**<sup>22</sup>
- **navigating the benefit system while transitioning from systems involvement** (e.g., foster care, criminal legal system)
- **knowing about SNAP but not wanting to apply because of the stigma** around receiving “food stamps” (Gaines-Turner, Simmons, and Chilton 2019)

## What Role Does Structural Racism Play in SNAP?

Structural racism appears in SNAP in several ways, including the following.

- Long-standing structural inequalities are reflected in high levels of food insecurity for Black, Latinx, and Native American families when compared with their white peers (Odoms-Young 2018). The pandemic has exacerbated these preexisting vulnerabilities. A survey conducted during the pandemic found that Black households were more likely to be unable to buy food than other households, and racial and ethnic minority households were less confident in their food security generally (Morales et al. 2020). Further, about 40 percent of families with Black or Latinx parents reported experiencing food insecurity in the past month, compared with about 15 percent of families with white parents (Gupta, Gonzalez, and Waxman 2020). SNAP is among the most important policy tools for combating these disparities by providing need-based nutrition assistance.<sup>23</sup>
- Evidence exists that immigrant families (particularly Latinx families) experience hunger at high rates and have been particularly hard hit by the pandemic. These families are often reluctant to seek public assistance they qualify for, including SNAP, out of fear that doing so could affect their immigration status (Waxman, Gupta, and Karpman 2020).<sup>24</sup> In other cases, immigrants do not qualify because of the five-year waiting period, despite high levels of need.
- Further, work requirements do not consider the realities that disproportionately disadvantage people of color in the labor market, from racial discrimination to higher rates of incarceration and a higher likelihood of living in communities with low access to jobs. These policies therefore

reduce mobility for people of color by reducing the leveling effects of benefit programs like SNAP for these populations.<sup>25</sup>

## Areas for Further Research

Much research on the effectiveness of SNAP has focused on younger children, leaving several important areas for further research related to young people. Some questions that would be useful to explore include the following:

- To what extent do adolescents and young adults receive SNAP benefits, where are there gaps in assistance, and what policy changes could address inadequacies?
- What are the patterns of food hardship for young people generally and during COVID-19 specifically, and how can assistance be better targeted to reduce this hardship?
- What alternative benefit delivery strategies could more effectively serve young people? How can we test these strategies?
- Are some groups of young people more likely than others to lose SNAP despite ongoing need? If so, why? For example, are some young people more likely than others to lose SNAP because of paperwork or procedural errors; fluctuating incomes; noncompliance with work reporting requirements; and/or other reasons?
- What should be included in a national research agenda on how SNAP could better support youth transitions from institutional settings?

## Action Steps

The current safety net is not designed to support young people's needs. We urgently need an intentional and comprehensive approach to supporting them in meeting their basic needs so they can capitalize on the inherent strengths of this stage of life and enter adulthood in a position to thrive and build stronger communities.

For example, policymakers could consider making changes to SNAP that include the following:

- **simplifying eligibility rules and application and renewal processes** to account for young people's complex relationships with family members and changing housing circumstances, challenges young people have filling out paperwork, and the fact that income volatility resulting from unstable jobs can make it more challenging to document and maintain eligibility for safety net programs
- **adopting policies that increase joint participation in SNAP and Medicaid/CHIP among eligible people**, such as using screeners to assess eligibility for multiple programs, colocating program offices, and using information from one program to enroll in or renew another

- **implementing promising models for collaborative work across systems to help transitioning young people access SNAP and other benefits** (e.g., a California policy requires a partnership between SNAP and child welfare staff (Fremstad 2012), and states could consider prioritizing SNAP employment and training programs for young people aging out of foster care and others)
- **increasing benefit amounts to account for the nutritional needs of adolescents**
- **closing eligibility gaps** for immigrant young people, students, independent young people, and other underserved young people

## Notes

- <sup>1</sup> University of Minnesota, “Nearly One in Four Young People Experience Food Insecurity from Adolescence to Adulthood,” *Medical Xpress* (blog), August 5, 2020, <https://medicalxpress.com/news/2020-08-young-people-food-insecurity-adolescence.html>.
- <sup>2</sup> University of Minnesota, “Nearly One in Four Young People Experience Food Insecurity from Adolescence to Adulthood,” *Medical Xpress* (blog), August 5, 2020, <https://medicalxpress.com/news/2020-08-young-people-food-insecurity-adolescence.html>.
- <sup>3</sup> “Tracking the COVID-19 Recession’s Effects on Food, Housing, and Employment Hardships,” Center on Budget and Policy Priorities, updates December 18, 2020, <https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-recessions-effects-on-food-housing-and>.
- <sup>4</sup> “Supplemental Nutrition Assistance Program: Data as of July 10, 2020,” US Department of Agriculture, August 18, 2020, <https://fns-prod.azureedge.net/sites/default/files/resource-files/34SNAPmonthly-7b.pdf>.
- <sup>5</sup> “Policy Basics: The Supplemental Nutrition Assistance Program (SNAP),” Center on Budget and Policy Priorities, June 25, 2019, <https://www.cbpp.org/research/policy-basics-introduction-to-the-supplemental-nutrition-assistance-program-snap>; “A Quick Guide to SNAP Eligibility and Benefits,” Center on Budget and Policy Priorities, September 1, 2020, <https://www.cbpp.org/research/food-assistance/a-quick-guide-to-snap-eligibility-and-benefits>; Note that this is the federal gross income limit, but states can waive this up to 200 percent of FPL through what is known as broad based categorical eligibility (BBCE). For a description of how BBCE works, see Waxman (2019).
- <sup>6</sup> “SNAP Eligibility,” USDA Food and Nutrition Service, December 31, 2020, <https://www.fns.usda.gov/snap/recipient/eligibility>.
- <sup>7</sup> “Are You Homeless? You Might Be Able to Get Help from SNAP!,” United States Department of Agriculture, February 19, 2020, [https://fns-prod.azureedge.net/sites/default/files/Homeless\\_QA\\_0.pdf](https://fns-prod.azureedge.net/sites/default/files/Homeless_QA_0.pdf).
- <sup>8</sup> “Broad-Based Categorical Eligibility,” United States Department of Agriculture, May 2020, <https://fns-prod.azureedge.net/sites/default/files/resource-files/BBCEStatesChart%28May2020%29.pdf>.
- <sup>9</sup> “SNAP Policy on Non-Citizen Eligibility,” USDA Food and Nutrition Service, September 4, 2013, <https://www.fns.usda.gov/snap/eligibility/citizen/non-citizen-policy>.
- <sup>10</sup> “Facts About SNAP,” Food and Nutrition Service, US Department of Agriculture, August 14, 2019, [https://www.fns.usda.gov/snap/facts\\_](https://www.fns.usda.gov/snap/facts_).
- <sup>11</sup> Ashley Burnside, “Latest COVID Relief Bill Provides Increased Access to SNAP for College Students,” Center for Law and Social Policy, December 22, 2020, <https://www.clasp.org/blog/latest-covid-relief-bill-provides-increased-access-snap-college-students>; Kristin Blagg, Macy Rainer, and Kelia Washington, “College Students’ Soiled Safety Net,” Urban Institute, May 13, 2020, <https://www.urban.org/features/college-students-siloed-safety-net>.

- <sup>12</sup> Chesterfield Polkey, “Most States Have Ended SNAP Ban for Convicted Drug Felons,” National Conference of State Legislatures, 2019, <https://www.ncsl.org/blog/2019/07/30/most-states-have-ended-snap-ban-for-convicted-drug-felons.aspx>.
- <sup>13</sup> See 7 CFR 273.1(b)(4).
- <sup>14</sup> “SNAP Work Requirements,” Food and Nutrition Service, US Department of Agriculture, May 29, 2019, <https://www.fns.usda.gov/snap/work-requirements>; “ABAWD Waivers,” Food and Nutrition Service, US Department of Agriculture, October 20, 2020, <https://www.fns.usda.gov/snap/ABAWD/waivers#:~:text=The%20law%20allows%20states%20to,the%20general%20SNAP%20work%20requirements>.
- <sup>15</sup> “SNAP: COVID-19 Waivers by State,” Food and Nutrition Service, US Department of Agriculture, November 9, 2020, <https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-waivers-flexibilities>; “States Are Using Much-Needed Temporary Flexibility in SNAP to Respond to COVID-19 Challenges,” Center on Budget and Policy Priorities, updated December 24, 2020, <https://www.cbpp.org/research/food-assistance/states-are-using-much-needed-temporary-flexibility-in-snap-to-respond-to>.
- <sup>16</sup> “Supplemental Nutrition Assistance Program (SNAP) – Families First Coronavirus Response Act and Impact on Time Limit for Able-Bodied Adults Without Dependents (ABAWDs),” US Department of Agriculture Food and Nutrition Service, March 20, 2020, <https://www.fns.usda.gov/snap/ffcra-impact-time-limit-abawds>; Parker Gilkesson, “Federal Court Ruling and Congress Ensure Food Aid Reaches People With Low Incomes During the Coronavirus Crisis,” Center for Law and Social Policy, March 19, 2020, <https://www.clasp.org/blog/federal-court-ruling-and-congress-ensure-food-aid-reaches-people-low-incomes-during-coronavirus>.
- <sup>17</sup> “Congress Passes Urgently Needed COVID-19 Relief and Spending Bills, Billions Short and Months Late,” Center for Law and Social Policy, December 22, 2020, <https://www.clasp.org/press-room/press-releases/congress-passes-covid-19-relief-bill?emci=f2ef8b5a-744f-eb11-a607-00155d43c992&emdi=74362049-9d4f-eb11-a607-00155d43c992&ceid=2835602>.
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## Acknowledgments

This brief was funded by the Annie E. Casey Foundation through the Low-Income Working Families Initiative. We thank them for their support but acknowledge that the findings and conclusions presented are those of the authors alone and do not necessarily reflect the opinions of the Foundation.

The views expressed are those of the authors and should not be attributed to the Urban Institute, its trustees, or its funders. Funders do not determine research findings or the insights and recommendations of Urban experts. Further information on the Urban Institute's funding principles is available at [urban.org/fundingprinciples](https://urban.org/fundingprinciples).

We would like to extend our thanks and appreciation to the many researchers, safety net experts, and youth service providers who shared their time and expertise with us for this series of briefs: Laudan Aron, Sunindiya Bahalla, Samantha Batko, Hamutal Bernstein, Celeste Bodner, Ed Bolen, Shelley Waters Boots, Mark Courtney, Stacy Dean, Elizabeth Edwards, Linda Giannarelli, Mark Greenberg, Jenny Haley, Samantha Harvell, Jenny Kenney, Nicole Lander, Ingrid Lofgren, Josh Louwerse, Elaine Maag, Drew Mangrum, Amy Matsui, Donna Pavetti, Mike Pergamit, Jeffrey Poirier, Susan Popkin, Natletha Gorpu Sumo, Elizabeth Taylor, Bharti Wahi, Elaine Waxman, and Ruthie White.



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