

## 01 Adult Student Eligibility for NA



This section includes information about whether an adult student is eligible to participate in the Nutrition Assistance program.

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### Policy

Participants who meet the definition of a student are required to meet NA student work requirements or an NA student exemption to be potentially eligible for NA benefits.

The definition of a student includes the requirement to be age 18 through 49 and enrolled at least half-time in an institution of higher education. When the participant meets the definition of an NA student and does not meet at least one of the NA student eligibility requirements or exemptions, they are not eligible for NA.

The NA student is considered enrolled during vacation, recess or between semesters or quarters provided the student intends to register for the next normal school term.

**NOTE** The student is not considered enrolled during vacation or recess when the student graduates, drops out, is expelled, is suspended, or does not intend to register for the next normal school term.

The school defines what is considered half-time. When the school has no official definition of half-time, the minimum number of full-time hours, as defined by the school, is divided by two to determine half-time.

### Institution of Higher Education

An institution of higher education is defined as a private or public institution that meets **any** of the following:

- Normally requires a high school diploma or General Educational Development (GED) diploma for enrollment.
- Admits anyone (with or without a high school diploma or GED) who is over the age of 15 and the institution is legally authorized or recognized in Arizona for providing **any** of the following:

An educational program beyond a high school education such as colleges, universities, and community colleges.

**NOTE** Enrollment in a self-study or correspondence course is not considered enrollment in an institution of higher education.

A program of training to prepare students for gainful employment such as trade schools, technical schools and vocational schools.

A school that has an established program that allows attendance via the Internet is acceptable when the participant is meeting the school's requirements. The school must identify what is considered full-time or half-time enrollment.

See **all** of the following for NA student requirements and exemptions:

- [NA Student Employment](#)
- [NA Student Eligibility-Work-study](#)
- [NA Student Eligibility-Jobs SNAP CAN.](#)
- [NA Student Exemptions](#)

### **NA Student Employment**

NA students who are employed and paid for at least 80 hours in a 30-day period are potentially eligible for NA benefits. It is not required that the student earn minimum wage.

Self-employed students must be employed for an average of 20 hours or more per week and receive earnings equal to the [federal minimum wage\(g\)](#).

NOTE Working for the landlord as payment for shelter expenses (In-kind income) is not considered employment when determining NA student eligibility.

### **NA Student Work-study**

NA students who are participating in a state or federally financed work-study program during the regular school year are potentially eligible for NA benefits. The student must be working at a job and receiving earnings or tuition credit for the work performed.

NOTE The criteria are met even when earnings from certain work-study programs are not counted for eligibility and income determination.

A student who is working in a hospital or student teaching is not considered as participating in a state or federally financed work-study. The student is receiving class credits, not earnings or tuition credit.

NA student eligibility based on work-study participation continues through vacations, breaks in the school year, and between semesters or quarters. The student is required to have been participating in the work-study during the school period prior to the break and must plan on continuing the work-study once classes resume.

### **NA Student Jobs SNAP CAN.**

NA students are eligible when assigned to or placed in an institution of higher education through **one** of the following:

- The Jobs Program.
- The Workforce Innovation and Opportunity Act (WIOA).
- The Supplemental Nutrition Assistance Program Career Advancement Network (SNAP CAN).
- A Tribal employment and training program.

- Section 236 of the 1974 Trade Adjustment Act (TAA). TAA is made available to workers who lose jobs or hours of work due to increased imports.

## NA Student Exemptions

Effective 01/01/2021, see [Urgent Bulletin](#) emailed 01/14/2021 regarding a temporary student exemption.

The participant may be an eligible student when they meet **any** of the following NA Student Exemptions:

- Under the age of 18, or over the age of 49.
- Currently receiving any CA benefits.
- Meets the Unfit for Work NA Work Requirement Exemption. (See [NA Work Requirement Exemptions](#) for more information and policy.)
- The student is responsible for the care of a dependent child, based on **one** of the following caretaker exemptions:

The student is a single parent, enrolled full-time and responsible for the care of a dependent child under age 12, regardless of adequate childcare.

The child is age five, through age 11 and adequate childcare is not available. (See [Example 1](#))

The child is under the age of six.

When the NA budgetary unit includes more than one child and more than one adult student responsible for the care of the children, every student is eligible for the caretaker exemption at a ratio of one student per eligible child. (See [Example 2](#) and [Example 3](#))

### NA Student Exemption-Adequate Childcare

Consider the availability of adequate childcare when an NA student is responsible for the care of a child age five, through age 11. Adequate childcare allows the NA student to attend class and to meet employment or work-study requirements.

Adequate childcare can be **any** of the following:

- Available - A participant age 18 or older, other than the NA student, is suitable and able to provide the childcare.
- Unavailable - The participant states adequate childcare is unavailable due to **one** of the following:

Lack of public or private transportation to obtain childcare.

Lack of funds to pay a childcare provider.

### NA Work Registration Requirements

When NA student eligibility criteria is met, the NA participant is exempt from NA work registration requirements. (See [NA Work Requirement Exemptions](#) for more information and policy.)

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### Procedures

The school defines what is half-time attendance. When questionable, contact the school or view official school publications, such as **any** of the following:

- Catalogs
- Class schedules

When the school has no official definition of half-time, divide the minimum number of full-time hours by two. Use the full-time number of hours required for the course of study.

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### Verification

System interfaces and the [case file\(g\)](#) must be reviewed before verification is requested. No additional verification is needed when AZTECS interface or HEAplus hubs have verified any of the nonfinancial or financial eligibility factors.

When school attendance is questionable, verify school attendance using **any** of the following procedures:

- Request verification from the PI
- Make a collateral contact to the school
- Send an Authority to Release Student Information (FAA-0060A) form to the school

The participant has the primary responsibility for providing verification. (See [Participant Responsibilities – Providing Verification](#) for additional policy.)

**Any** of the following sources can be used to verify school attendance when requested:

- Correspondence from the school
- Registration form
- School records or school official's statements
- Home teaching affidavit filed with the county
- Current report card
- Scholarship boards/records
- Participant's statement (allowed as a last resort)

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### AZTECS Procedures

When a budgetary unit includes a participant who is age 18 through 49, key **one** of the following in the STUDENT STATUS field on SSDO:

- FT when the participant is enrolled full-time in an institution of higher education
- HT when the participant is enrolled half-time in an institution of higher education

- NS when the participant is enrolled less than half-time in an institution of higher education or is not a student

When the adult student meets **any** of the following criteria, key the appropriate Exemption Reason Code in the STUDENT EXEM field on SSDO:

- When the adult student meets the criteria for employment, EM Exemption Reason Code

NOTE The hours of NA students who are employed and paid for at least 80 hours in a 30-day period may be converted. The converted hours, after keying the employment on EAIC must be at least 80.

- When the adult student meets the criteria for work-study key the WS Exemption Reason Code.
- When the student meets the criteria for a CA Jobs or an NA work requirements exemption key the ET Exemption Reason Code. (See [NA Student Eligibility-Jobs SNAP CAN](#) for information and policy.)
- When the student is receiving cash assistance, key the CA Exemption Reason Code.
- When the student meets the Unfit for Work NA Work Requirement Exemption, key the ET Exemption Reason Code. (See [NA Work Requirement Exemptions](#) for more information and policy.)
- When the student meets the criteria for the caretaker of a child exemption, key the CH Exemption Reason Code.
- When the student does not meet an NA Student Exemption key the No Exemption (NE) Exemption Reason Code.

A student who does not meet at least one of the NA student eligibility requirements or an NA student exemption is an ineligible student. Key OU in the PT field on SEPA.

When denying or stopping benefits for the budgetary unit, key the FS Denial or Closure Reason Code on FSED, allowing for NOAA. When there are other eligible participants in the budgetary unit, key expenses on EXNS next to the NA participant receiving income. This allows the expense deduction for the budgetary unit. (See [Example 4](#))

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### Examples

1) **All** the following apply for Nutrition Assistance (NA):

- David (age 28/student/unemployed)
- Carol-spouse (age 26/student/unemployed)
- Frank-common child (age 8)

The budgetary unit includes two adult students and one child. Adequate childcare is not available for both adult students. David and Carol will need to decide which one of them will receive the caretaker exemption.

2) **All** of the following apply for Nutrition Assistance (NA):

- Richard (age 28/student/unemployed)
- Theresa-spouse (age 26/unemployed)
- Dick-common child (age 6)
- Jane-common child (age 3)
- Sally-common child (age 1)

Richard is eligible for the NA student caretaker exemption, even though Theresa is available for childcare. The reason Richard is eligible for the NA student caretaker exemption is that the household includes at least one child, age five or under, per adult student.

3) NA benefits are approved for the months of 01/2019-12/2020.

**All** the following apply for Nutrition Assistance (NA):

- Richard (age 28/student/unemployed)
- Maria -spouse (age 26/student/unemployed)
- Dick-common child (age 5)
- Jane-common child (age 3)

Richard and Maria are both available to care for the children. However, both are eligible for the caretaker exemption because the household includes at least one child, age five or under, per adult student.

4) Denise applies for NA benefits for herself and her two children, Susan (17 years old) and Jane (12 years old).

Denise is a full-time student with no income and does not meet the NA student eligibility requirements. She is coded OU for NA.

Susan works full-time and is the only participant in the NA budgetary unit receiving income.

Since Susan is the only participant in the budgetary unit receiving income, the budgetary unit's expenses are keyed next to Susan.

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### Legal Authorities

7 CFR 273.5

7 CFR 273.5(a)

7 CFR 273.5(b)(1 through 11)

### [Prior Policy](#)

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