

01 Adult Student Eligibility for NA



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

Policy

Participants who meet the definition of a student enrolled in an [institution of higher education\(g\)](#), are required to meet NA student work requirements or an NA student exemption to be potentially eligible for NA benefits.

A participant is an NA student when age 18 through 49 and enrolled at least half-time in an institution of higher education. A participant is considered enrolled in an institution of higher education when **one** of the following occurs:

- They are enrolled in a business, technical, trade, or vocational school and in a course of study that normally requires a high school diploma or General Educational Development (GED) diploma.
- They are enrolled in a college or a university in a course of study working towards a degree.

NOTE An NA student is not enrolled in an institution of higher education, when only enrolled in a special program. Special programs include, and are not limited to, **any** of the following:

- English as a Second Language (ESL) courses
- Adult basic education courses
- Literacy courses
- GED courses
- Community education courses

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.

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

- [NA Student Employment](#)
- [NA Student Eligibility Work-study](#)

- [NA Student Employment and Training Programs](#)
- [NA Student Participating in an On-The-Job Training Program](#)
- [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 Eligibility 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.

NOTE NA students may contact the school for more information on work-study programs.

NA Student Employment and Training Programs

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

- The Jobs Program. (See [CA Work Programs](#) for more information.)
- The Workforce Innovation and Opportunity Act (WIOA). (See [WIOA](#) for more information.)
- The Supplemental Nutrition Assistance Program Career Advancement Network (SNAP CAN). (See [SNAP CAN](#) for more information.)
- 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.

- A Career and Technical Education Program (CTE) in accordance with the Carl D. Perkins Career and Technical Education Act that meets **all** of the following:
The program is designed to be completed in four years, or less.
The program is completed at an institution of higher education.
- A similar employment and training program. The program must meet **all** of the following:
Offered by a state or local government
For low-income households
Provide at least one component similar to a component offered by SNAP CAN.
(See [SNAP CAN](#) for more information.)

NA Student Participating in an On-The-Job Training Program

NA students who are participating in an on-the-job training program are potentially eligible for NA benefits during the training period. An NA student is participating in an on-the-job training program when **all** of the following occur:

- Hired and paid wages by an employer.
- Engaged in productive work and receiving training.

NOTE The student is only eligible for NA benefits during the time the student is being trained by the employer.

NA Student Exemptions

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

- Age 17 or younger.
- Age 50 or older.
- Currently receiving any CA benefits.
- Unfit for Work. (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 aged 11 or younger, regardless of adequate childcare.

When adequate childcare is not available, and the child is age 6 through 11.
(See [Example 1](#))

The child is age five or younger.

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 6 through 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 aged 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.)

Procedures

Complete **all** of the following for NA students:

- Determine whether the participant is enrolled in an institution of higher education.
- Determine whether the participant is attending half-time or more.
- Determine whether the participant meets an NA student work requirement or an NA student exemption.
- Document the case file.

Send the Student Information Verification (C013) notice when additional verification is needed. Allow the participant 10 calendar days to provide the information.

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.

The school defines what is half-time attendance. When questionable, contact the school or request the participant provide verification.

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

- Request verification from the PI using the Student Information Verification (C013) notice
- 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
- Current report card
- Scholarship boards/records
- Participant's statement (allowed as a last resort)

Verification of NA student employment is determined by the total hours worked in a calendar month by the student who is employed. Certain AZTECS screens verify when the student has met the requirements.

Verification of participation in work study may include, and is not limited to, **all** of the following:

- Completion of the FAA-0060A form
- Collateral Contact to the school
- Correspondence from the school
- Paystubs that indicate the student is paid for work study hours

Verification of participation in an on-the-job training program may include, and is not limited to, **all** of the following:

- Collateral Contact or signed statement from the employer verifying participation in the program and the length of the training
- Any other verification that confirms the student's participation in the program and the length of the training

When a participant is placed in an [institution of higher education](#) through an employment and training program, verification may include, and is not limited to, **any** of the following:

- Collateral Contact or signed statement from the employment and training program provider, verifying participation in the program
- Any other verification that confirms the student's participation in the program

For the Age and CA program participation exemptions, verification is available in AZTECS.

For verification that can be used for the unfit for work exemption, see [NA Work Requirements](#).

Verification that adequate childcare is unavailable may include, and is not limited to, **any**

of the following:

- Participant Statement verification, unless [questionable\(g\)](#).
- Screenshots confirming childcare distance or cost, from the childcare provider's website or the program's application.
- Collateral Contact or a signed and dated statement from the childcare provider.

NOTE Provider documentation needs to contain the name, address, and telephone number of the provider.

AZTECS Keying Procedures

When a budgetary unit includes a participant who is aged 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 enrolled in an institution of higher education

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

- CA for participants receiving cash assistance
- CH for care of a dependent child exemption
- EM for NA Student employment exemption

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.

- ET for **all** of the following:
 - On-the-job training program participation
 - Employment and training program participation
 - Unfit for work exemption
- WS for work study participation

A student who receives the majority of their meals through either a mandatory or optional meal plan or does not meet at least one of the NA student eligibility requirements or an NA student exemption is an ineligible student. Key **all** of the following:

- NE in the STUDENT EXEM field on SSDO
- OU in the PT field on SEPA

When the ineligible adult student is the only participant in the budgetary unit, complete **all** of the following:

- Key the FS Denial Closure Reason Code on FSED, allowing for NOAA.
- Send the NA – Ineligible (F210) notice.

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 6](#))

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 need to decide which one of them receives 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 younger, per adult student.

3) **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 younger, per adult student.

4) Lois applies for NA benefits for herself, she is approved for NA and was screened as an appropriate candidate to participate in SNAP CAN. Lois is subject to ABAWD requirements and voluntarily contacts a SNAP CAN provider. Lois is referred to complete a Career and Technical Education Program by the SNAP CAN provider. She reports the change to FAA that she is now enrolled in a

school for Cosmetology and can obtain her license in two years. A high school or GED diploma is required to enroll.

Lois is voluntarily participating, and complying, with the requirements of an employment and training program and provides the required verification. It is verified that the school is an institution of higher education. Since Lois has an ABAWD exemption and is an eligible NA Student, she continues to remain eligible for NA benefits.

5) Maria applies for NA benefits for herself.

Maria is a full-time student enrolled in an institution of higher education. She receives breakfast and lunch every weekday through her meal plan, which is equivalent to ten meals per week.

Even though Maria receives two of the three daily meals throughout the weekday, Maria is potentially an eligible adult student for NA because ten meals per week are less than the half of the majority of 21 total weekly meals. Maria is potentially eligible for NA benefits when she meets other NA eligibility criteria.

6) 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.

DBME BEST Google Job Aids

[Institution of Higher Education \(IHE\)](#)

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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