



SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

Federal Actions Needed to Help Connect College Students with Benefits

Report to Congressional Requesters

March 2025

GAO-25-106000

United States Government Accountability Office

Accessible Version

GAO Highlights

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Highlights of [GAO-25-106000](#), a report to congressional requesters

March 2025

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Federal Actions Needed to Help Connect College Students with Benefits

Why GAO Did This Study

According to a national survey, almost one-quarter of college students were food insecure in 2020, yet GAO found many who were potentially eligible for SNAP had not received benefits. The substantial federal investment in higher education is at risk of not serving its intended purpose if students drop out because of limited or uncertain access to food. Studies have found using data to direct outreach to those potentially eligible can increase benefit uptake.

GAO was asked to review college student food insecurity. This report addresses (1) the extent to which Education and USDA have supported data use to help college students access SNAP benefits, and (2) how selected states and colleges have used student data to help connect students with SNAP benefits.

GAO reviewed relevant federal laws and agency documents. GAO also interviewed officials from Education, USDA, and national higher education and SNAP associations. GAO selected three states and interviewed officials from state SNAP and higher education agencies and seven colleges in these states. GAO visited one selected state in person and interviewed two virtually. States were selected based on actions to support food insecure students and stakeholder recommendations.

What GAO Recommends

GAO is making five recommendations, including that Education develop a plan to implement FAFSA data-sharing and assess its benefit notification approach; and that USDA improve its SNAP agency guidance. The agencies neither agreed nor disagreed with these recommendations.

What GAO Found

The U.S. Department of Agriculture (USDA) and the Department of Education have taken some steps to connect college students with Supplemental Nutrition Assistance Program (SNAP) benefits to help them pay for food, but gaps in planning and execution remain. Effective July 2024, a new law gave Education authority to share students' Free Application for Federal Student Aid (FAFSA) data with USDA and state SNAP agencies to conduct student outreach and streamline benefit administration. However, according to officials, Education had not yet developed a plan to implement these complex data-sharing arrangements. This risks delays in students getting important information that could help them access benefits they are eligible for. Following the passage of this new law, Education began providing a notification about federal benefit programs for students who may be eligible for them. However, it has not evaluated its method for identifying potentially eligible students. According to GAO analysis of 2020 Education data, Education's method could miss an estimated 40 percent of potentially SNAP-eligible students.

USDA encouraged state SNAP agencies to enhance student outreach and enrollment assistance. However, USDA has not included important information about the use of SNAP data and other student data in its guidance to state

SNAP agencies. These gaps in guidance have left states with questions about how to permissibly use and share students' data to help connect them with benefits.

Student Food Assistance at a College Basic Needs Center



Source: GAO. | GAO-25-106000

Officials from the three selected states and seven colleges GAO contacted described key strategies for communicating with students about their potential SNAP eligibility. These include using destigmatizing language, linking students directly to an application or support staff, and coordinating outreach efforts with SNAP agencies. Officials from the states and colleges GAO contacted said it is helpful to have staff available on campus to assist students with the SNAP application. Some colleges have found it helpful to partner with their respective SNAP agencies to obtain information on the status of students' applications.

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Abbreviations

Abbreviation	Word or Phrase
COVID-19	Coronavirus disease 2019
E&T	Employment and Training
Education	U.S. Department of Education
EFC	Expected Family Contribution
FAFSA	Free Application for Federal Student Aid
FNS	Food and Nutrition Service
FSA	Federal Student Aid
NASFAA	National Association of Student Financial Aid Administrators
NASSGAP	National Association of State Student Grant and Aid Programs
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USDA	U.S. Department of Agriculture

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441 G St. N.W.
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March 11, 2025

The Honorable Angie Craig
Ranking Member
Committee on Agriculture
House of Representatives

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

The Honorable David Scott
House of Representatives

In fiscal year 2023, the U.S. Department of Education spent approximately \$31.4 billion on Pell Grants to help over 6 million students with financial need attend college.¹ 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.² Food insecure students are also more likely to report symptoms of depression and anxiety.³

Although no 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).⁴ The U.S. Department of Agriculture (USDA) is responsible for working with state agencies to administer SNAP, which is the nation's largest nutrition assistance program available to low-income

¹For 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. The Pell Grant is the largest federal grant program offered to undergraduate students and is designed to assist students from lower-income households. To qualify for a Pell Grant, a student must demonstrate financial need through the Free Application for Federal Student Aid (FAFSA).

²According 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.

³Hans 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*, vol. 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*, vol. 32, No. 2 (2018): 349–354.

⁴Federal 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).

households.⁵ College students 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.

We previously reported that an estimated 23 percent of college students (3.8 million) experienced food insecurity in 2020.⁶ This was more than double the estimated food insecurity rate among U.S. households overall (11 percent) at that time.⁷ However, we found that fewer than half of food insecure students whom we estimated to be potentially eligible for SNAP in 2020 reported household receipt of benefits (estimated 41 percent).⁸ By contrast, USDA estimated that 78 percent of potentially eligible households overall received SNAP benefits in 2020.⁹ According to some studies, one way to increase benefit uptake is to use data to direct outreach efforts to those who are potentially eligible.¹⁰

You asked us to review food insecurity among college students. This report addresses (1) the extent to which Education and USDA have supported data use to help college students access SNAP benefits, and (2) how selected states and colleges have used student data to help connect students with SNAP benefits.

We employed multiple methodologies to address both of our research questions. We reviewed relevant agency regulations, guidance, and other documents. We also interviewed officials from Education and the USDA Food and Nutrition Service (FNS) national office as well as two FNS regional offices that oversee SNAP programs in our selected states. We selected three states (California, Massachusetts, and Washington) to learn about their current practices conducting SNAP outreach to students and their perceptions of related federal support. We selected states that were active in efforts to connect students with SNAP benefits based on input from Education officials, FNS officials, and stakeholders with expertise in college student food insecurity.¹¹ We interviewed officials from these three states' higher education and SNAP agencies and two to three selected public colleges in each state.¹² To select colleges, we asked higher education and SNAP agency officials from

⁵SNAP 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.

⁶The 95 percent confidence interval for this estimate is within a margin of error of +/- 1 percentage point. GAO, *Supplemental Nutrition Assistance Program: Estimated Eligibility and Receipt Among Food Insecure College Students* [GAO-24-107074](#) (Washington D.C.: June 24, 2024).

⁷The 90 percent confidence interval for this estimate is within a margin of error of +/- 0.2 percentage points. U.S. Department of Agriculture, Economic Research Service, *Household Food Security in the United States in 2020*, ERR-298 (September 2021).

⁸The 95 percent confidence interval for this estimate is within a margin of error of +/- 3 percentage points. [GAO-24-107074](#).

⁹The 90 percent confidence interval for this estimate is within a margin of error of +/- 1 percentage point. Karen Cunyningham, *Empirical Bayes Shrinkage Estimates of State Supplemental Nutrition Assistance Program Participation Rates: Fiscal Year 2018 to Fiscal Year 2020*, a report prepared at the request of the U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Contract No. 12-3198-22-F-0020, (Mathematica, August 2023).

¹⁰Amy Finkelstein and Matthew J. Notowidigdo, "Take-up and targeting: Experimental evidence from SNAP," *The Quarterly Journal of Economics*, vol.134, no. 3 (2019): 1505-1556; Karla Palos Castellanos et al., "Emailing Eligible College Students Resulted in More than 7,000 Students Applying for CalFresh Benefits," Policy Brief, California Policy Lab (August 2022).

¹¹We also considered whether states listed students as a priority population in their fiscal year 2022 SNAP outreach plans.

¹²SNAP agencies in each state—and in some cases counties within a state—administer SNAP by determining household eligibility, calculating monthly benefits, and issuing benefits to eligible participants. SNAP is county-administered in one of the states we selected, and we also met with officials from the SNAP offices located in the counties of our selected colleges. We also spoke with officials from one state's SNAP outreach partner that exclusively supported college student outreach and enrollment assistance. State higher education agencies can take the form of boards, offices, or commissions that coordinate and regulate higher education.

the three selected states to recommend public colleges in their state that were actively supporting students' access to SNAP benefits.¹³ We visited one state in person and conducted virtual interviews in the other two states. The experiences of these states and colleges are not generalizable but serve as illustrative examples.

To gain further insight into federal support for efforts to connect students with SNAP benefits, we obtained additional information from state SNAP agencies and state higher education agencies. Specifically, we reviewed the FNS-approved state SNAP outreach plans for fiscal year 2024.¹⁴ We surveyed members of an association of state higher education agencies that administer state student grant and aid programs. We received survey responses from 19 of the 43 members of the association.¹⁵ We also interviewed representatives from the State Higher Education Executive Officers Association, the National Association of State Student Grant and Aid Programs (NASSGAP), the National Association of Student Financial Aid Administrators (NASFAA), and the American Association of SNAP Directors. We also analyzed data from Education's 2020 National Postsecondary Student Aid Study, the most recent year available, to assess Education's method of selecting students to notify about their potential eligibility for benefits.¹⁶ We assessed Education's and FNS's communication and information sharing activities against aspects of their respective agency strategic plans and federal internal control standards. Specifically, we determined that internal controls related to management clearly defining its objectives and using quality information and effective communication were significant to our objectives.

We conducted this performance audit from May 2023 to March 2025 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.

¹³We selected two to three colleges in each state (for a total of seven colleges). To do this, we considered the institution's level (i.e., 2-year or 4-year) with the goal of selecting at least one 2-year and one 4-year college from each state. We also considered whether colleges were mentioned in the state's SNAP outreach plan. Two of the selected colleges were also SNAP outreach partners.

¹⁴FNS established outreach priority areas to encourage states to target certain underrepresented or particularly vulnerable populations to help ensure eligible households can access SNAP benefits. FNS reimburses state agencies for up to 50 percent of allowable administrative costs, including outreach and application assistance activities. FNS has encouraged states to prioritize outreach to college students for each fiscal year between 2022 and 2025.

¹⁵We emailed our web-based questionnaire in December 2023 to state higher education agencies (representing 42 states and the District of Columbia) that are members of the National Association of State Student Grant and Aid Programs (NASSGAP). Some states do not administer state grant programs and therefore are not NASSGAP members. Other states may administer grant programs but opt not to join this association. After we drafted the questionnaire, we asked for comments from NASSGAP leadership and pretested it with an official from one NASSGAP member organization to ensure the questions were answerable and the phrasing and terminology were interpreted consistently. We modified the questionnaire after considering their feedback.

¹⁶For additional details on our methodology for estimating college students' potential SNAP eligibility and students' household receipt of benefits, see [GAO-24-107074](#). We assessed the reliability of Education's dataset by reviewing existing information about the data and the system that produced them and by interviewing agency officials knowledgeable about the data. We found it reliable for the purposes of our reporting objectives.

Background

College Student Eligibility for SNAP

The Food and Nutrition Service (FNS) within USDA oversees states' administration of SNAP, the primary federal benefit program to address food insecurity among low-income households.¹⁷ 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.¹⁸

The Food Stamp Act Amendments of 1980 restricted college students' eligibility for SNAP benefits unless they meet certain additional criteria.¹⁹ Congress designed 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.²⁰ 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,
- caring for a child in their household under the age of 6,
- caring for a child in their household aged 6 to 11 and are 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,²¹

¹⁷Some 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 and 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.

¹⁸7 C.F.R. § 273.9. Household gross income at or below 130 percent of the federal poverty level 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 expand automatic eligibility for SNAP to households that are eligible for or receiving benefits from another assistance program, which may apply to a larger group of low-income households.

¹⁹Pub. 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. For the purposes of discussing student access to SNAP benefits in this report, we will refer to these individuals as "college students".

²⁰7 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.

²¹TANF 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.

- not physically or mentally fit (e.g., have a physical or mental disability or condition that prevents them from working),²² or
- enrolled in certain programs for the purpose of employment and training.²³

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; or²⁴
- had an Expected Family Contribution (or EFC, which is based on a student's financial aid application) of \$0 during the academic year. This included students who were eligible for a maximum Pell Grant award.²⁵

These temporary student exemptions expired in June 2023 following the end of the public health emergency.

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.²⁶ In addition, under current law, SNAP benefits generally cannot be used to purchase cafeteria meals.²⁷ 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 general population.²⁸

Although almost one-quarter of college students experienced food insecurity in 2020, a majority of those food insecure students who were potentially eligible for SNAP (estimated 59 percent) did not report receiving benefits.²⁹ Studies have found that multiple factors may contribute to students' low SNAP uptake, including

²²Students 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.

²³This includes participating in an approved on-the-job training program. 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.

²⁴Participating 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 regardless of whether they obtained a work-study job.

²⁵EFC was a number that helped determine students' eligibility for certain types of federal student aid. This number was calculated using the information that students provided on their Free Application for Federal Student Aid (FAFSA). As a result of the FAFSA Simplification Act amendments to the Higher Education Act, EFC was replaced with the Student Aid Index starting in the 2024-25 school year.

²⁶7 C.F.R. § 273.1(b)(7)(vi).

²⁷U.S.C. § 2016(b).

²⁸U.S.C. §§ 2014, 2015; 7 C.F.R. § 273.9.

²⁹The 95 percent confidence interval for this estimate is (56, 61). [GAO-24-107074](#).

students not being aware of SNAP's existence, not knowing if they are eligible or how to apply for benefits, or mistakenly thinking that all students are ineligible.³⁰

FNS-Funded SNAP Outreach

State agencies administering SNAP have the option to conduct outreach to inform low-income households about the availability, eligibility requirements, application procedures and the benefits of SNAP.³¹ According to FNS guidance, SNAP outreach can help correct myths and misperceptions about SNAP and enable potentially eligible individuals to make an informed decision about whether to apply. FNS reimburses state SNAP agencies for up to 50 percent of allowable administrative costs, including outreach and application assistance activities. State agencies often partner with local community organizations to provide these outreach services.³² In recent years, FNS has issued memos to state SNAP agencies recommending that they conduct outreach activities to serve communities that may not be well-served by existing efforts ("SNAP outreach priority memos"). In these memos, FNS has specifically encouraged states to prioritize outreach efforts to college students.

Student Aid and the FAFSA Simplification Act

Education's Office of Federal Student Aid (FSA) administers numerous federal student aid programs, including federal grants and loans. Students apply for this aid by completing the Free Application for Federal Student Aid (FAFSA), which is typically done online (see sidebar).

³⁰The Hope Center for College, Community, and Justice, *#RealCollege 2021: Basic Needs Insecurity During the Ongoing Pandemic*, (Philadelphia, PA: Mar. 31, 2021); Michelle Hodara, Marbella Uriostegui, Rachel Maller, Shannon Davidson, *Connecting College Students to Public Benefits: Findings from Community College of Allegheny County and Montgomery County Community College*, Education Northwest. (Portland, OR: April 2023).

³¹7 U.S.C. § 2020(e)(1)(A).

³²A state SNAP agency may conduct outreach activities on its own, or contract with a subrecipient to conduct these activities. Subrecipients may be community or faith-based organizations, food banks or pantries, retailers, or other community organizations such as colleges. For the purposes of this report, we will refer to these entities as "outreach partners".

Free Application for Federal Student Aid (FAFSA)

Before each year of college, students may apply for federal grants, work-study, and loans using the FAFSA form. Colleges use students' FAFSA data to determine federal aid eligibility. Many states and colleges also use FAFSA data to award their own aid.

After students' FAFSA forms are submitted and processed, students can access their FAFSA Submission Summary—an electronic or paper document that summarizes the information students reported on their FAFSA. It includes their estimated eligibility for a Federal Pell Grant and federal student loans, Student Aid Index (SAI), among other things. Colleges receive a similar document produced by the FAFSA Processing System. This report is sent to the colleges that students designate on their FAFSA.

The FAFSA Submission Summary is not a financial aid offer; it provides only estimates of students' eligibility for federal student aid. Students receive a financial aid offer from colleges after they have been accepted for admission. Financial aid offers tell students exactly what financial aid they are eligible to receive at a particular college.

Source: U.S. Department of Education. | GAO-25-106000

Congress passed the FAFSA Simplification Act in December 2020.³³ The Act represented a significant overhaul of the processes and methodology used to calculate and award federal student aid. The simplified FAFSA included changes to streamline the application process by reducing the number of questions and, when possible, pulling students' and parents' financial information directly from the Internal Revenue Service (IRS).

FAFSA Simplification Act amendments to the Higher Education Act created new requirements and authorities, related to using FAFSA data to conduct outreach and enrollment assistance for SNAP and other means-tested benefits (benefits).³⁴ For example, Education is required to notify certain FAFSA applicants of federal benefits that they may be eligible for, including SNAP.³⁵ Education is also authorized to establish data-sharing agreements with state and federal benefit agencies to facilitate benefit outreach and enrollment for students.

Legal Restrictions and SNAP Outreach

Colleges and state agencies must comply with applicable federal laws when designing efforts to use data for SNAP outreach and application assistance. Multiple federal laws restrict how student data can permissibly be used, and colleges and state higher education agencies must determine which law(s) apply for their intended purpose. If multiple laws cover a specific use of data, the most restrictive provision applies, according to Education officials (see table 1). The Food and Nutrition Act of 2008 and related federal regulations restrict the ways that state SNAP agencies are permitted to use and share SNAP data.³⁶

³³Pub. L. No. 116-260, div. FF, tit. VII, 134 Stat. 1182, 3137-201. The FAFSA Simplification Act originally had a general effective date of July 1, 2023, but at the request of Education, Congress passed an extension, pushing back the effective date 1 year to October 2024. However, we previously reported that the rollout of the simplified FAFSA for the 2024–2025 cycle faced numerous delays and technical issues. GAO, *FAFSA: Education Needs to Improve Communications and Support around the Free Application for Federal Student Aid*, [GAO-24-107407](#) (Washington D.C.: Sept. 24, 2024).

³⁴A means-tested benefit is one where the administering agency considers an applicant's income and resources as part of determining their eligibility. Federal means-tested benefit programs include SNAP, Temporary Assistance for Needy Families, the special supplemental nutrition program for Women, Infants, and Children (WIC), Supplemental Security Income (SSI), free or reduced-price school lunch, and others.

³⁵20 U.S.C. § 1090(a)(3)(A)(iv).

³⁶7 C.F.R. § 272.1(c).

Table 1: Selected Provisions of Federal Laws That Restrict Student Data Use for Benefit Outreach

Act	Act description
Higher Education Act	Restricts use of Free Application for Federal Student Aid (FAFSA) data to the application, award, and administration of student financial aid, except under specific circumstances. ^a
Family Educational Rights and Privacy Act (FERPA)	Prohibits educational agencies and institutions from disclosing personally identifiable information from education records to any third party without the prior written consent of the student, unless permitted under an exception.
Privacy Act of 1974	Governs the collection, maintenance and use of records maintained by federal agencies and generally prohibits agencies from disclosing individually identifiable information from those records without consent.

Source: GAO analysis of selected provisions of federal laws. | GAO-25-106000

^aThe FAFSA Simplification Act permitted Institutions of Higher Education to share FAFSA data with organizations assisting applicants in applying for federal assistance for any component of their cost of attendance provided they obtained the express written consent of an applicant. In addition, the FAFSA Simplification Act amended the Higher Education Act to require the Department of Education to develop plans to notify prospective students and their families of their potential eligibility for certain federal benefits, including the Supplemental Nutrition Assistance Program (SNAP).

Education and FNS are responsible for ensuring colleges and state agencies follow applicable federal laws and regulations when using data to connect students with SNAP.³⁷ Education, through FSA, is responsible for supporting, monitoring, and enforcing state higher education agencies' and colleges' compliance with federal laws and regulations governing student aid programs, including the use of data collected on students' FAFSA forms. FNS is responsible for overseeing state compliance with federal laws and regulations governing data use and privacy for SNAP.

Education Has Clarified Policy, but Has Not Sufficiently Supported States and Colleges in Using Data for SNAP Outreach and Enrollment

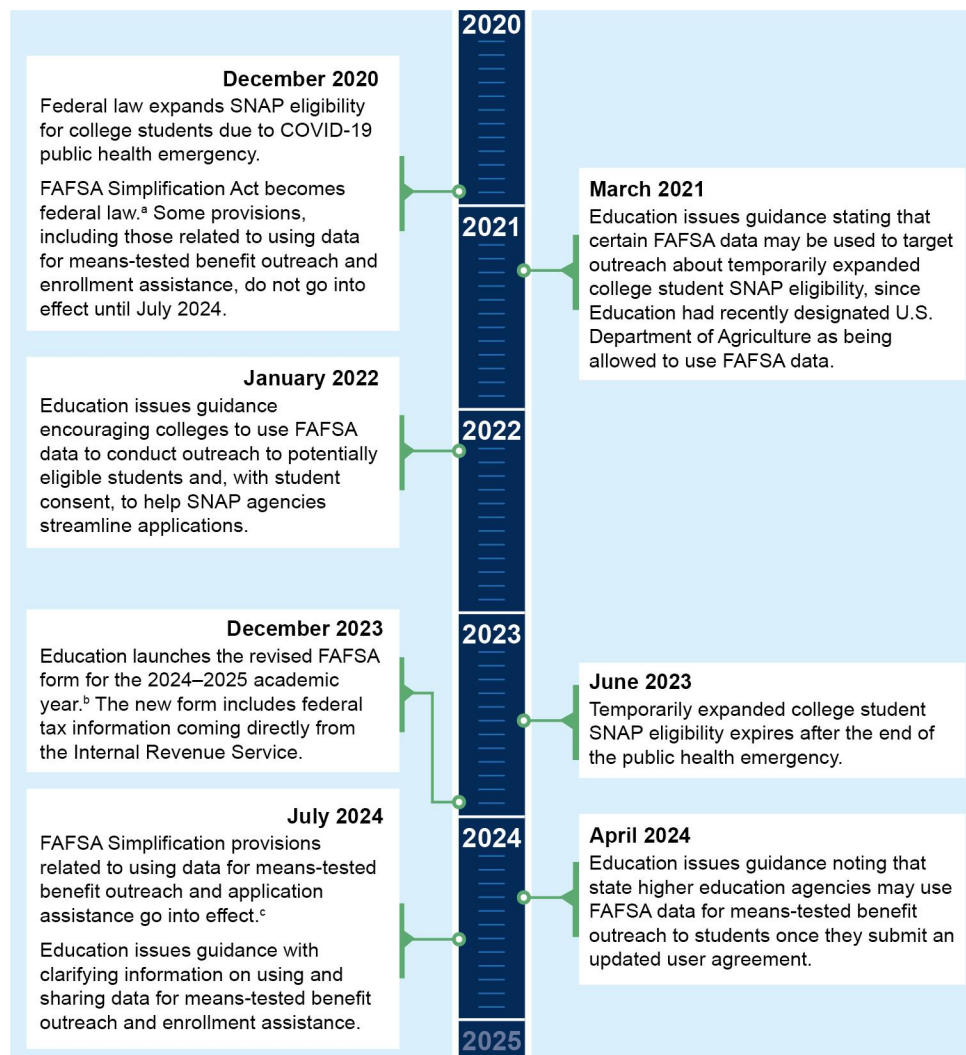
Amid Changing Laws, Education Issued Guidance That Clarified Data-Use Authorities and Committed to Ongoing Student Outreach About SNAP

Federal laws that govern college student eligibility for SNAP and how states and colleges can use data to help connect students with benefits have changed in recent years. For example, the temporary student SNAP exemptions expired in 2023 and the FAFSA Simplification Act became fully effective in 2024, creating new requirements and authorities related to using FAFSA data to conduct outreach and enrollment assistance for SNAP, as discussed above. Amid these changes, Education has emphasized to states and colleges the

³⁷State higher education agencies and colleges are required to submit written agreements as a part of their administration of federal student aid programs. As part of these agreements, state agencies and colleges commit to complying with legal and regulatory requirements, including those related to using and protecting student data. To operate SNAP, state agencies are required to sign a federal-state agreement that commits states to complying with applicable laws and regulations.

importance of connecting students with benefits, such as SNAP. Education issued multiple guidance documents on using FAFSA data to help them do so (see fig. 1).³⁸

Figure 1: Key Events in Supplemental Nutrition Assistance Program (SNAP) and College Student Policy, December 2020–July 2024



Source: GAO analysis of Education guidance and related laws. | GAO-25-106000

³⁸U.S. Department of Education, Federal Student Aid, *Use of FAFSA Data to Administer Federal Programs*, GEN-22-02 (Jan. 20, 2022); Office of Career, Technical, and Adult Education, *End of the Public Health Emergency and Impact on Student Eligibility for Supplemental Nutrition Assistance Program (SNAP)*, (Mar. 30, 2023); Federal Student Aid, *Updates to the FAFSA Completion Initiative and Means-Tested Benefits Outreach*, GENERAL-24-35 (Apr. 8, 2024); Federal Student Aid, *Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies*, GENERAL-24-93 (July 29, 2024); Federal Student Aid, *Guidance for State Grant Agencies and Institutions of Higher Education on the Access, Disclosure, and Use of FAFSA Data for the Application, Award, and Administration of Student Aid Programs*, GENERAL-24-129 (Nov. 7, 2024).

Accessible Data for Figure 1: Key Events in Supplemental Nutrition Assistance Program (SNAP) and College Student Policy, December 2020–July 2024

- **December 2020:** Federal law expands SNAP eligibility for college students due to COVID-19 public health emergency.

FAFSA Simplification Act becomes federal law.^a Some provisions, including those related to using data for means-tested benefit outreach and enrollment assistance, do not go into effect until July 2024.

- **January 2022:** Education issues guidance encouraging colleges to use FAFSA data to conduct outreach to potentially eligible students and, with student consent, to help SNAP agencies streamline applications.
- **December 2023:** Education launches the revised FAFSA form for the 2024–2025 academic year.^b The new form includes Federal Tax Information coming directly from the Internal Revenue Service.
- **July 2024:** FAFSA Simplification provisions related to using data for means-tested benefit outreach and application assistance go into effect.^c

Education issues guidance with clarifying information on using and sharing data for means-tested benefit outreach and enrollment assistance.

- **March 2021:** Education issues guidance stating that certain FAFSA data may be used to target outreach about temporarily expanded college student SNAP eligibility, since Education had recently designated U.S. Department of Agriculture as being allowed to use FAFSA data.
- **June 2023:** Temporarily expanded college student SNAP eligibility expires after the end of the public health emergency.
- **April 2024:** Education issues guidance noting that state higher education agencies may use FAFSA data for means-tested benefit outreach to students once they submit an updated user agreement.

Source: GAO analysis of Education guidance and related laws. | GAO-25-106000

^aStudents may apply for federal grants, work-study, and loans by completing the Free Application for Federal Student Aid (FAFSA).

^bEducation launched the simplified FAFSA form on December 30, 2023; however, the application was not consistently available until January 7, 2024, according to Education.

^cThese provisions include a requirement for Education to notify students of their potential eligibility for certain federal means-tested benefits, including SNAP, on their FAFSA forms and new authorities for Education to share data with federal and state agencies that administer certain federal means-tested benefits, once an agreement is in place.

Prior to July 2024, Education's guidance did not include important clarifying details, leaving officials from some state higher education agencies and colleges with questions about permitted practices when using data for SNAP outreach. In December 2023 we surveyed state higher education agencies about their perspectives on laws and federal guidance at the time:

- 11 out of 19 state agency officials who responded said it was unclear whether any organizations were allowed to use student data for targeted SNAP outreach,
- 15 of 19 said it was unclear if and under what circumstances students' prior written consent was required before using certain student data, and
- 12 out of 19 said it was unclear which laws and rules apply to different data sources.³⁹

³⁹The remaining officials out the 19 who responded to our survey indicated either that the laws and guidance at the time were not unclear or they had no opinion.

Additionally, Higher Learning Advocates and the National Association of Student Financial Aid Administrators (NASFAA) conducted a college survey in 2023. In it, they found that, of those who reported not providing outreach to students about federal benefits, 23 percent of 182 responding colleges said they had not done so due to fear of using FAFSA data in a way that is not authorized by the federal government.⁴⁰ Officials from selected colleges and state higher education agencies also differed in their interpretations of certain authorities. This included, for example, whether offices on-campus other than financial aid could use FAFSA data for SNAP outreach and whether state higher education agencies were authorized to do so.

During our review, Education issued multiple guidance documents that clarified key points for using and sharing student data for SNAP outreach.⁴¹ For example, Education's July 2024 guidance said that other on-campus offices were permitted to use FAFSA data for SNAP outreach, under certain conditions. In April 2024 and July 2024 guidance, Education clarified that state higher education agencies would be authorized to use FAFSA data for SNAP outreach, once they submitted an updated user agreement. Education also hosted a training webinar on this guidance in July 2024 for colleges, state higher education agencies, and others.

Because this guidance was published recently, we were unable to assess the overall effect it had on colleges and state agencies; however, representatives we spoke with from national associations for colleges and state higher education agencies shared some positive initial reactions. For instance, a representative from a national association of financial aid administrators said this guidance had been helpful, likely improved college officials' understanding of permitted practices, and increased their confidence in complying with applicable laws.

Education and FNS also established a memorandum of understanding in September 2024 that formalized a plan for both agencies to take actions to support college students' access to SNAP. In it, Education committed to sending annual emails with information on SNAP to colleges and to certain low-income students identified as potentially eligible for SNAP, using FAFSA data.⁴² In November 2024, Education sent emails to approximately 8 million students, according to officials. In this memorandum, Education also committed to supporting USDA with student outreach pilot projects in selected states. These projects would establish processes for sharing students' FAFSA data between colleges and state SNAP agencies to inform outreach to potentially SNAP-eligible students. USDA has not yet begun to implement these pilot projects.

⁴⁰Higher Learning Advocates, *The Numbers Speak for Themselves: Using FAFSA Data to Secure Today's Students' Basic Needs*, (January 2024).

⁴¹U.S. Department of Education, Federal Student Aid, *Updates to the FAFSA Completion Initiative and Means-Tested Benefits Outreach*, GENERAL-24-35 (Apr. 8, 2024); *Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies*, GENERAL-24-93 (July 29, 2024); *Guidance for State Grant Agencies and Institutions of Higher Education on the Access, Disclosure, and Use of FAFSA data for the Application, Award, and Administration of Student Aid Programs*, GENERAL-24-129 (Nov. 7, 2024).

⁴²In the memorandum of understanding, USDA also commits to notifying state SNAP agencies in advance of Education sending these emails, to allow them to prepare for any related increase in student applications.

Education Does Not Have a Plan for Data Sharing and Its Targeted Notifications May Not Reach Many SNAP-Eligible Students

Education's Implementation of New Data Sharing Authorities

Selected County Supplemental Nutrition Assistance Program (SNAP) Agency Official Perspectives on Student Financial Aid Data Use and Sharing for Enrollment

"It would make things a lot more streamlined if students' FAFSA data could prepopulate a [SNAP] application, since both forms ask for so much of the same information. This would be a game-changer. It could revolutionize how students get SNAP..."

There is a general need to reduce the application burden for those who need nutrition assistance... Each program requires people to go through so much trouble to apply ...it would be a tremendous benefit to SNAP staff, by reducing the administrative burden to processing these applications, and very effective in helping students access food they vitally need."

Source: GAO interview with SNAP agency officials in one state. | GAO-25-106000

Starting in July 2024, the FAFSA Simplification Act gave Education the authority to enter into data sharing agreements with certain state and federal agencies. These agreements could enable agencies to get FAFSA data directly from Education, with students' prior consent, and use it to administer federal benefits, including SNAP. For example, Education could share data from a student's FAFSA application with a state SNAP agency. The state SNAP agency could then use it to help determine the student's eligibility for SNAP. Officials from one state SNAP agency told us such data sharing could streamline benefit administration by speeding up verification processes and eliminating some paper requirements (see sidebar). With access to students' FAFSA data, state SNAP agencies could also conduct targeted outreach to those students identified as potentially eligible.

Education officials did not have a written plan detailing what the agency would need to complete to move forward with data sharing; however, officials provided us with a general explanation of two important aspects of the process, which we have summarized below. These include obtaining student consent and establishing data-sharing agreements with agencies that administer benefits.⁴³

Obtaining students' consent. According to officials, Education must take several steps before it can begin obtaining student consent to share their FAFSA data with benefit agencies. Officials said they would need to consult with other agencies and Education's internal legal counsel to draft consent language to add to the FAFSA form. They would also need to publish proposed FAFSA form revisions to the Federal Register and go through the public comment process. Finally, Education would need to build the new option into the electronic FAFSA form.

Establishing data-sharing agreements. Education would also need to establish unique data-sharing agreements with each benefit agency involved, each of which would take time and resources, according to officials. In the case of SNAP, this could mean establishing a data-sharing agreement with FNS or with individual state SNAP agencies.

Education officials said they would need to coordinate with each benefit agency to develop individual data-sharing agreements. These agreements would need to be tailored to account for various factors such as how

⁴³Required consent includes that of any other FAFSA contributors, including the applicant's parent(s) or spouse.

benefit agencies plan to use the FAFSA data. Officials said that some types of agreements will take longer to set up than others; for example, computer-matching between agency systems can require 12 to 18 months to execute. Education officials also told us that, given capacity constraints, they would not be able to work on data-sharing agreements with all benefit agencies at once, so would need to prioritize which to pursue first.

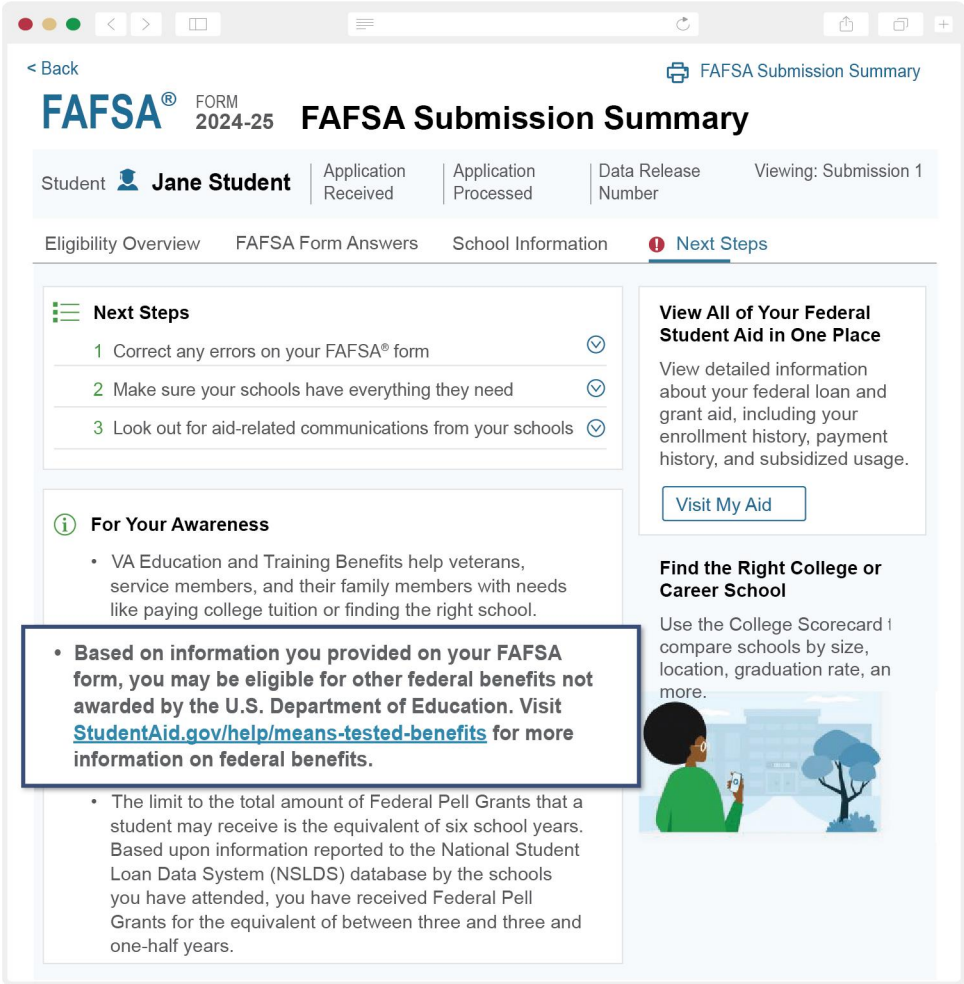
Education officials told us they had not taken steps to address these FAFSA Simplification Act data-sharing provisions, which were effective in July 2024. While officials said they intend to move forward with sharing FAFSA data with other agencies, Education does not have a formal plan in place for how it would implement this effort, nor has the agency estimated a timeframe for when it would begin sharing data. Federal internal controls state that agencies should define their objectives, including what is to be achieved, who is to achieve it, how it is to be done, and the time frames for doing so.⁴⁴ Given the complex, multi-step nature of this work, without a written plan, Education may not be prepared to implement these FAFSA data-sharing authorities. This could lead to delays in vulnerable college students getting information that could help them access food and benefits they are eligible for.

Education's Notification Targeting and Reach

Following the passage of the FAFSA Simplification Act, Education began providing a targeted notification about federal benefit programs to students who may be eligible for them. The notification appears on students' FAFSA submission summary reports and the records that go to colleges and state higher education agencies. This notification informs students that they may be eligible for federal benefits not provided by Education (see fig. 2). The text of this notification links to a webpage that has descriptions of nine federal benefit programs that students may be eligible for. The SNAP program's hyperlink takes applicants to FNS's general SNAP webpage.

⁴⁴GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

Figure 2: Means-Tested Benefit Notification on Students’ Free Application for Federal Student Aid (FAFSA) Submission Summary Reports



Source: U.S. Department of Education. | GAO-25-106000

Accessible Data for Figure 2: Means-Tested Benefit Notification on Students’ Free Application for Federal Student Aid (FAFSA) Submission Summary Reports

Illustration of FAFSA Submission Summary web page highlighting the following bullet under the “For Your Awareness” section:

Based on information you provided on your FAFSA form, you may be eligible for other federal benefits not awarded by the U.S. Department of Education. Visit [StudentAid.gov/help/means-tested-benefits](\"http://StudentAid.gov/help/means-tested-benefits\") for more information on federal benefits.

Source: U.S. Department of Education. | GAO-25-106000

As of November 2024, Education targeted federal benefit notifications to students who both:

- are eligible for a Pell Grant, a federal student aid grant designed to support students from low-income households; and
- indicated their household has received at least one federal benefit.⁴⁵

With these notifications, Education's goal is to use FAFSA data to identify students who are potentially eligible for benefits and send information about those benefits to them, according to officials.

However, Education's approach for identifying students who are likely eligible for SNAP may not reach large numbers of students who may be eligible for benefits. Using Education's data from 2020, we estimated that this targeting approach would have missed 40 percent of students who were potentially eligible for SNAP but not receiving benefits, since these students were Pell Grant-eligible but did not report receiving any benefits listed on the FAFSA form.⁴⁶ These students would likely be less familiar with available federal benefits and how to apply, which would make such a notification even more useful to them. Using Pell Grant eligibility to target these notifications may also leave out other students who are potentially eligible for benefits. For example, graduate students are generally ineligible to receive Pell Grants but could be eligible for SNAP benefits.

When asked about its targeting approach, Education officials said they had not analyzed data to assess how well their approach aligned with benefit eligibility. Officials also said that, due to the demands of launching the new FAFSA form, they did not have sufficient capacity to assess whether creating notifications tailored to individual benefit programs would be beneficial. However, officials said that creating such tailored notifications for each benefit program is something they could consider in the future.

In addition, Education officials told us they did not consult with agencies that administer these benefits, like FNS, when designing this notification or its targeting approach. Moving forward this is an example of something that Education and FNS could consult on as they work together on student SNAP outreach, as described in their recently signed memorandum of understanding. This memorandum includes an option for Education and FNS to consult with each other and explore other SNAP outreach methods, including sending messages to students about their potential SNAP eligibility during the financial aid application process. Federal internal controls state that agencies should use quality information to make informed decisions, evaluate performance, and achieve their objectives.⁴⁷ Without evaluating its targeting approach, in consultation with

⁴⁵U.S. Department of Education, Federal Student Aid, *2025-26 FAFSA Specifications Guide, Volume 7 – Comment Codes*, (October 2024). The Pell Grant is the largest federal grant program offered to undergraduates. Education uses federal poverty guidelines to make Pell Grant eligibility determinations. The FAFSA collects information on whether students' households received one of several federal means-tested benefits listed on the form.

⁴⁶The FAFSA form asks applicants if their household has received the following federal benefits: Free or Reduced-Price School Meals, Supplemental Security Income (SSI), Temporary Assistance for Needy Families, Special Supplemental Nutrition Program for Women Infants and Children (WIC), and SNAP. This estimate is based on our analysis of Education's 2020 National Postsecondary Student Aid Study and has a 95 percent confidence interval with a margin of error of +/- 2 percentage points. Since these data were collected, The FAFSA Simplification Act changed the Pell Grant eligibility calculation. Starting with the 2024–2025 award year, Pell Grant eligibility has been linked to students' family size and federal poverty level, and Education reported that early data show this contributed to Pell Grant eligibility increasing by 7 percent. For more information on students' estimated eligibility for and receipt of SNAP benefits, see [GAO-24-107074](#).

⁴⁷[GAO-14-704G](#).

FNS officials, and adjusting its approach as needed, Education may not be using this FAFSA notification to effectively reach the students who could benefit the most.

Education's Efforts to Inform Colleges and States About the Notification

Education also has not shared important information with colleges and state higher education agencies about the addition of this benefit notification to students, including its targeting approach and content, according to officials. Education did not include information about this FAFSA benefit notification in the agency's July 2024 guidance to colleges, state agencies, and other stakeholders, though that guidance was specifically focused on FAFSA data use for benefit outreach (discussed above).⁴⁸ When we asked what steps Education had taken to share information about these notifications, officials said colleges and agencies could refer to the FAFSA Specifications Guide.⁴⁹ While this guide includes some information on the notification, the specific reference to this notification is a brief technical description in a document that is over 500 pages long and covers over 300 different notifications.

Education officials and representatives from a national association of financial aid administrators said that college officials were likely unfamiliar with this notification, particularly given the heavy burden and stress associated with Education's recent roll-out of the new FAFSA form.⁵⁰ Education officials agreed that it would be helpful for college officials to understand how its notifications had been targeted and how colleges could use them to inform their own outreach efforts. With this information, college officials could be better prepared to respond to students' questions about these notifications, that students often ask college officials upon receiving communication from Education, according to representatives from a national association of financial aid administrators. Additionally, officials from one of the colleges we contacted said that more information from Education about this notification, would better prepare them to connect students with available campus resources and help them apply for SNAP (see sidebar).

Selected College Official Perspective on New FAFSA Notifications to Students

"It would also be incredibly helpful if Education communicated with other stakeholders about this FAFSA notification to students who might be eligible for SNAP, including state SNAP agencies, colleges, [and] state grant agencies. It is a pain point when those on the ground don't know what's happening and when, and it can be confusing when students ask why they received a message... Anything Education could do to help inform in advance those on the ground about what's happening and when will ensure efforts are aligned and as streamlined as possible."

Source: GAO interview with officials at a college in one selected state. | GAO-25-106000

Officials from national associations of financial aid administrators and state higher education agencies said it is important for Education to provide information to colleges and state higher education agencies about how it targeted these notifications and the content going to students. Education's Federal Student Aid strategic plan for fiscal years 2023 to 2027 states that the agency will provide accurate and timely information and support to its stakeholders.⁵¹ Yet, Education has not done so for these benefit notifications. Providing quality information

⁴⁸U.S. Department of Education, Federal Student Aid, *Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies*, GENERAL-24-93 (July 29, 2024).

⁴⁹U.S. Department of Education, Federal Student Aid, *2025-26 FAFSA Specifications Guide, Volume 7 – Comment Codes*, (October 2024).

⁵⁰See [GAO-24-107407](#) for more information on the recent implementation of a new FAFSA form.

⁵¹U.S. Department of Education, Federal Student Aid, *Strategic Plan for Fiscal Years 2023-2027*.

to colleges and state agencies about these notifications could better support their efforts to connect students with benefits.

USDA Did Not Include Key Information About Data-Informed Outreach to Students in Guidance to SNAP Agencies

In recent years, FNS has encouraged SNAP agencies to focus outreach on college students who are potentially eligible for SNAP but may be unaware of or misinformed about their potential eligibility. FNS has also noted that colleges may use data to inform and target this outreach. However, FNS has not provided key information in its guidance to SNAP agencies on the permitted uses of FAFSA or SNAP data when conducting these efforts.

Permitted Uses of FAFSA Data

FNS has issued outreach priority memos that have specifically urged state SNAP agencies to partner with colleges and others to use FAFSA data for SNAP outreach and application assistance.⁵² However, FNS has not conveyed information about important elements of permitted FAFSA data use for SNAP outreach and enrollment assistance for students. FNS's fiscal year 2025 guidance contains general language stating that colleges may use FAFSA data for outreach and cites Education's January 2022 guidance on the topic. FNS has not updated its guidance to include Education's more recent July 2024 guidance that answered key questions about permissible practices (discussed above). By not citing this recent guidance, FNS is missing an opportunity to provide the most relevant and up-to-date information for state SNAP agencies about state higher education agencies' ability to use FAFSA data for student outreach. FNS guidance also does not include information on the new data-sharing authority granted by the FAFSA Simplification provision described earlier in this report. This provision allows Education to share FAFSA data with state SNAP agencies so they can use it in SNAP administration and outreach.

Officials from each of our three selected state SNAP agencies, along with two SNAP outreach partners, said it would be helpful for FNS to provide information on using student data, including FAFSA data, for outreach and application assistance. For example, officials from one state SNAP agency said that FNS should work with Education to provide detailed information on which data can be used, for what purposes, and by whom. Officials from another state SNAP agency said that it would be helpful for FNS to be equipped to provide quality information and answer related questions about FAFSA data use from state SNAP agencies. Officials from our selected state SNAP agencies also told us they were not given advance notice of recent changes from FAFSA Simplification. As a result, they were unable to take steps to prepare for or take advantage of new authorities.

Permitted Uses of SNAP Data

As noted above, the Food and Nutrition Act of 2008 and related federal regulations restrict the ways in which SNAP agencies are permitted to use and share SNAP data.⁵³ According to FNS officials, there are some

⁵²U.S. Department of Agriculture, Food and Nutrition Service, *Supplemental Nutrition Assistance Program (SNAP) – FY 2024 Priority Areas for State Outreach Plans*, (Alexandria, VA: Feb. 1, 2023). *Supplemental Nutrition Assistance Program (SNAP) – Fiscal Year 2025 Priority Areas for State Outreach Plans*, (Alexandria, VA: Feb. 1, 2024).

⁵³7 C.F.R. § 272.1(c).

circumstances under which colleges could access SNAP data that are not detailed in the law. For example, FNS officials told us that colleges serving as formal SNAP outreach partners could be permitted some access to students' SNAP data, when part of the state's approved outreach activities. Officials also said that information about the status of students' SNAP applications (e.g., whether students have filed an application or are missing verification documents) rather than personal information students submit as part of their application (e.g., social security numbers) may be subject to different privacy restrictions. Yet, FNS has not issued guidance that addresses these areas of ambiguity.

According to FNS officials, state SNAP agencies should be able to understand the extent to which they are permitted to use and share SNAP data for student outreach by referring to text in the law itself. However, the law's text does not include information describing if and when colleges and state higher education agencies are permitted to access SNAP data. FNS officials said they address states' questions on a case-by-case basis. State agencies first submit questions to their FNS regional office; if regional office staff are unsure of the answer, they then send questions to the FNS national office. Officials noted that FNS has received several questions from state officials about using and sharing SNAP data, and the number of questions on this topic had recently increased.

This approach can have disadvantages for state SNAP agencies. A representative from a national association of state SNAP agencies said that inconsistency in policy interpretations across FNS regional offices could be a problem, with states receiving different answers to the same question. This association representative also said that state SNAP agencies sometimes face lengthy delays in getting answers to their questions. In addition, we found inconsistencies between information FNS provided to us and FNS guidance to state SNAP agencies.

For example, there are differing interpretations of how a signed form consenting to release of a student's information would affect SNAP agencies' authority to share data with college and state higher education agency officials. In guidance to state SNAP agencies on how to develop SNAP outreach plans, FNS notes that SNAP agencies may share SNAP applicant data only with "persons directly connected with the administration of SNAP or to others provided that the program recipient signs a release form documenting their agreement to the specific release."⁵⁴ Some of the colleges we contacted are obtaining a signed release of information from students to gain access to their SNAP application information. However, FNS officials told us that students signing a release of information would not necessarily permit colleges or state higher education agencies authority to access SNAP data. Given this, it is unclear when, if at all, a signed release would allow for disclosure of SNAP information, as described in the FNS guidance above.

Officials from some of the colleges and state higher education agencies we contacted said it is helpful to access certain SNAP data to target and individualize their outreach and application assistance efforts. However, officials from some selected state agencies also said they needed further support in understanding what was permitted. Without clear guidance on using and sharing SNAP data for student outreach and application assistance, states and colleges could inconsistently and inaccurately interpret what is allowable. This could lead to missed opportunities for informing outreach and application efforts or unintentionally

⁵⁴Without a signed release form, case file information on SNAP recipients, including names of recipients, Social Security numbers, and other sensitive information is considered confidential and may not be released. State agencies and their contractors must protect confidential and private information gained during the outreach process. U.S. Department of Agriculture, *Supplemental Nutrition Assistance Program (SNAP): State Outreach Plan Guidance*, (July 2017).

engaging in noncompliance. FNS officials said they had become aware of noncompliance in how some states are using SNAP data and addressed it with the agencies involved.

USDA's strategic plan for 2022 to 2026 says it will ensure that nutrition programs (e.g., SNAP) "use all available opportunities, including new communication mechanisms to...administer programs as effectively as possible to serve targeted populations," like college students, and will work with others, including agencies and colleges, to implement effective programs.⁵⁵ Federal internal controls state that agencies should communicate quality information to external partners to help achieve their objectives.⁵⁶ Without quality FNS guidance on permissible uses of both SNAP and FAFSA data for SNAP outreach and enrollment assistance, state SNAP agencies are not prepared to effectively partner with colleges and state higher education agencies to connect students with benefits, as encouraged by FNS. Moreover, state SNAP agencies are missing opportunities to take full advantage of available data use and sharing opportunities.

Selected States and Colleges Used Several Strategies to Identify SNAP Eligible Students and Provide Them with Application Support

Selected States and Colleges Found Certain Strategies Useful for Identifying and Informing Potentially Eligible Students About SNAP

Strategies for Identifying Potentially SNAP-Eligible Students

Officials from selected states and colleges told us they have used students' FAFSA data, state need-based grant aid receipt, and certain program enrollment information to help them identify students who are potentially eligible for SNAP benefits.

FAFSA data. State and college officials said that it was easier to identify students potentially eligible for SNAP during the COVID-19 public health emergency because, during that time, students' SNAP eligibility aligned more closely with available FAFSA data. Students who had an Expected Family Contribution (EFC) of \$0 based on their FAFSA or who were eligible for work-study were made temporarily eligible for SNAP, provided they met other eligibility rules, until the temporary student exemptions ended in June 2023. Officials from two of the states we contacted told us they emailed students who had a \$0 EFC because this information was readily available. Officials from the third state we contacted encouraged financial aid offices in colleges throughout the state to email students with a \$0 EFC and provided customizable email templates for colleges to use.

Since these temporary student SNAP exemptions have expired, officials from the states and colleges we spoke with said that they have used other available FAFSA data to identify students. Some have used certain student data that signal students are likely to meet the income eligibility threshold, such as students' Pell Grant eligibility. Other FAFSA data used relate to other student eligibility requirements, such as citizenship status, work-study eligibility, and whether students have dependents.

⁵⁵U.S. Department of Agriculture, *Strategic Plan Fiscal Years 2022–2026* (Washington, D.C.: March 2022).

⁵⁶GAO-14-704G.

State need-based grant aid receipt. State and college officials we interviewed said that students' eligibility for or receipt of state need-based grant aid is a useful way to identify students who are potentially eligible for SNAP.⁵⁷ Need-based grant aid eligibility may not directly align with SNAP eligibility but because it is generally granted to those who are low-income, those students eligible for need-based grants may also be eligible for SNAP. Moreover, officials from two of the three states we contacted partially fund their state need-based grant aid with some of their federal TANF block grant dollars. Because these grant recipients receive TANF benefits, they are eligible for the corresponding SNAP student exemption.⁵⁸ All three of our selected states have informed students who received a state need-based grant about their potential eligibility for SNAP. One state that responded to our survey of NASSGAP members shares specific language with colleges about SNAP and how to apply that colleges can include either on or with students' financial aid award offers. Additionally, officials from one of the colleges we contacted told us the school posts information to students' financial aid portals about their potential SNAP eligibility for those students who received the state need-based grant.

Program enrollment information. States and colleges can also use enrollment in state-designated employment and training programs to help identify students for targeted communication about potential SNAP eligibility. According to FNS, state SNAP agencies have the authority to determine which employment and training programs would qualify students for SNAP under the employment and training exemption. Students enrolled in these designated programs can be eligible for SNAP under this exemption if they meet all other eligibility criteria. Separately, states may select community colleges to operate as designated SNAP Employment and Training (E&T) providers. Students enrolled in such community college programs who receive SNAP benefits may receive additional services and support, such as dependent care or transportation assistance (see sidebar).

College Student Eligibility for Supplemental Nutrition Assistance Program (SNAP) Benefits Through Employment and Training Programs

SNAP Employment and Training (SNAP E&T). USDA provides funding to states to operate SNAP E&T programs, which offer individuals who receive SNAP additional employment and training services. SNAP E&T funds can be used to cover tuition and fees as well as other participant expenses including transportation, dependent care, and books. States are required to operate SNAP E&T programs, yet they have considerable flexibility in designing their programs, including selecting providers (e.g., community colleges, community-based organizations, among others). States establish SNAP E&T Plans annually and submit them to the USDA Food and Nutrition Service (FNS) for approval.

SNAP exemption for students who are enrolled in certain employment and training programs. Separately, states determine which state and locally administered programs qualify as "education and training programs for low-income households" to confer college student eligibility for SNAP. These programs must have at least one component that is equivalent to a SNAP E&T program component. According to FNS, this can include certain community college programs. Under this student SNAP exemption, states are not obligated to help students pay for tuition or other supportive services.

Source: GAO analysis of SNAP and SNAP E&T program information. | GAO-25-106000

State and college officials shared examples of how they inform students enrolled in these programs about SNAP. Officials from one state told us it has expanded students' access to SNAP through partnerships with the states' SNAP Employment and Training (E&T) programs. SNAP E&T programs operate at all community

⁵⁷According to Education, the term "need-based" is a designation that is based on a student's financial need. For example, a need-based grant might be awarded based on a student's low income.

⁵⁸States may use federal TANF block grant funds on a wide range of benefits and services, including to support work, education, and training programs.

colleges in this state. Officials told us these community colleges screen students for potential SNAP eligibility and refer students to the state SNAP agency to determine if they are eligible for state SNAP E&T program services. Officials from another state SNAP agency told us it has identified around 10,000 education programs that meet the employment and training related student exemption. Officials from a community college in this state said they conduct SNAP presentations for students enrolled in such eligible employment and training programs.

Strategies for Communicating with Potentially SNAP-Eligible Students

Officials from the states and colleges we contacted described several strategies they have found useful when communicating with students about their potential SNAP eligibility (see fig. 3).

Figure 3: Examples of Useful Strategies Cited for Communicating with College Students About Supplemental Nutrition Assistance Program (SNAP) Benefits



Source: GAO analysis of selected state and college interviews. GAO (icons). | GAO-25-106000

Accessible Data for Figure 3: Examples of Useful Strategies Cited for Communicating with College Students About Supplemental Nutrition Assistance Program (SNAP) Benefits

- **Implement a multipronged communication campaign.** Direct email messages to individual students about their potential SNAP eligibility work best as part of a broader communication campaign that uses multiple modes of communication from multiple sources, such as flyers, posters, and social media posts.
- **Use compassionate and destigmatizing language.** The use of inclusive language and creating a campus culture where students are not afraid to talk about SNAP helps to reduce stigma and helps students to feel more comfortable reaching out for help.
- **Send communication from a trusted source.** Have direct communication to students come from a known and trusted source, such as the college financial aid office.
- **Make help easy to find.** Keep communication brief and include a link to an application or a person who can help students apply for benefits.
- **Coordinate with the state or county SNAP agency.** Before messaging students, connect with the local SNAP agency to ensure program and eligibility information is accurate and coordinate timing to help SNAP agencies plan accordingly.

Source: GAO analysis of selected state and college interviews. GAO (icons). | GAO-25-106000



Source: GAO. | GAO-25-106000

Some of the states and colleges in our review found multiple forms of communication from multiple sources useful when communicating with students about SNAP. Officials from one college said that it is particularly helpful when students receive a consistent message across multiple sources, including Education, the state higher education agency, the college's financial aid office, and college staff who engage with in-person assistance. Officials also noted that word of mouth among students can be particularly powerful.

It is also helpful when students hear about SNAP through multiple forms of communication, including emails, text messages, social media, messages in students' financial aid portals, flyers around campus, and person-to-person communication, according to officials. Officials from one college added that they employ both general outreach to help build awareness of the SNAP program as well as direct outreach targeted to students who are likely eligible for benefits.





Source: GAO. | GAO-25-106000

Some of the states and colleges in our review found that framing SNAP in terms of financial aid for food to normalize receipt helps to reduce stigma. Officials said such framing helps address the stigma associated with accepting benefits because students are familiar with financial aid, as many students rely on grants and student loans to pay for tuition and other college expenses.

The higher education agency in one of the states we contacted has provided colleges with a messaging toolkit to help with SNAP outreach to students. Among the materials this state included in its toolkit were examples of positive and compassionate language (see fig. 4). This toolkit also encouraged colleges to be intentional about any photos they select for their outreach materials, suggesting colleges strive for fair representation of the school’s student population and to be cautious of biases associated with using food benefits.

Figure 4: One State’s Suggested Language to Use When Communicating to Students About Supplemental Nutrition Assistance Program (SNAP) Benefits

Use positive and inclusive language

 What not to say:	 What to say instead:
<ul style="list-style-type: none">• <i>Poor</i>	<ul style="list-style-type: none">• Students who work hard to make ends meet or students with low incomes
<ul style="list-style-type: none">• <i>Impoverished</i>	<ul style="list-style-type: none">• Students experiencing financial stress or stressed about making ends meet
<ul style="list-style-type: none">• <i>Food stamps</i>	<ul style="list-style-type: none">• Financial aid for food• Food or nutritional assistance or benefits
<ul style="list-style-type: none">• <i>Needy</i>	<ul style="list-style-type: none">• Facing financial barriers to academic success

Source: GAO analysis of state higher education agency documents. | GAO-25-106000

Accessible Data for Figure 4: One State’s Suggested Language to Use When Communicating to Students About Supplemental Nutrition Assistance Program (SNAP) Benefits

Use positive and inclusive language

What not to say:	What to say instead:
Poor	Students who work hard to make ends meet or students with low incomes
Impoverished	Students experiencing financial stress or stressed about making ends meet
Food stamps	Financial aid for food
	Food or nutritional assistance or benefits
Needy	Facing financial barriers to academic success

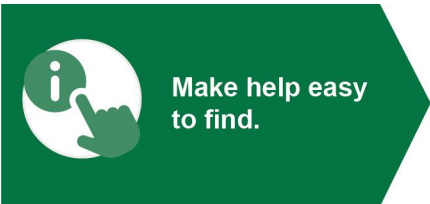
Source: GAO analysis of state higher education agency documents. | GAO-25-106000



Source: GAO. | GAO-25-106000

Some of the states and colleges in our review found it helpful to have direct communication to students come from a known and trusted source, such as the college financial aid office. Officials told us students are more receptive to information—more likely to open emails and follow links—when it comes from a credible source.

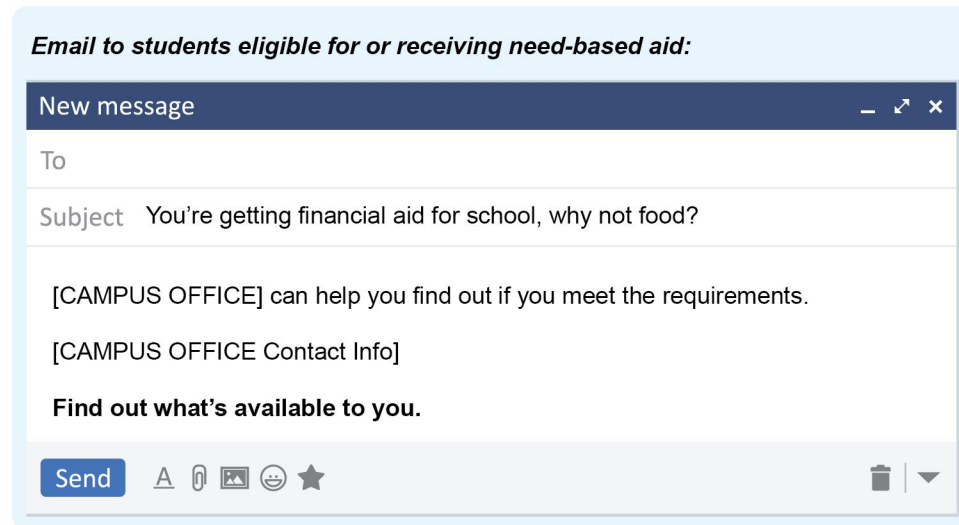
Officials from one SNAP agency told us that communications from a trusted source expedited their benefit administration as well. During the public health emergency, their state’s higher education agency emailed college students letters confirming that they met a SNAP exemption. SNAP officials were able to use this letter to verify students’ exempt status, which streamlined their processes. Officials told us they saw a large increase in SNAP participation among students in response to the state higher education agency’s student email initiative.



Source: GAO. | GAO-25-106000

Some of the states and colleges in our review found it helpful to keep messages to students brief and include a link to a SNAP application or direct students to a person who can help them apply. One SNAP agency told us that it contracted with a nonprofit to create a web-based SNAP application form specifically tailored for students. Officials said that emailing links directly to these student-specific applications has been successful in helping them reach a large number of students. Another state encourages colleges to provide contact information for campus staff who can help students through the application process (see fig. 5).

Figure 5: Example of an Email Template Used for Students Potentially Eligible for Supplemental Nutrition Assistance Program (SNAP) Benefits



Source: GAO analysis of state higher education agency documents. | GAO-25-106000

Accessible Data for Figure 5: Example of an Email Template Used for Students Potentially Eligible for Supplemental Nutrition Assistance Program (SNAP) Benefits

Email to students eligible for or receiving need-based aid:

Subject: You're getting financial aid for school, why not food?

[CAMPUS OFFICE] can help you find out if you meet the requirements.

[CAMPUS OFFICE Contact Info]

Find out what's available to you.

Source: GAO analysis of state higher education agency documents. | GAO-25-106000



Source: GAO. | GAO-25-106000

Some of the states and colleges in our review found it helpful to coordinate with their state or local SNAP agency before sending emails or other messages to students. SNAP agency officials told us it is helpful when they can coach college staff on how to identify the population of students likely to be eligible for SNAP benefits. Officials from one state higher education agency told us they worked with SNAP agency staff on the content of their messages to ensure they were accurately portraying student eligibility and application information. Officials also found that coordinating the timing of mass outreach efforts with the SNAP agency can be helpful.

Selected States and Colleges Cited Benefits of Pairing SNAP Student Outreach with Individualized Application Support

Officials from the states and colleges we contacted said it is helpful to have staff available on college campuses to assist and support students through the SNAP application process. Each of the three states we contacted has a state-wide initiative to help fund staff on college campuses to support students with accessing available benefits, including SNAP. For example, one state recently passed legislation that requires all public and tribal colleges in the state to have a benefits navigator on college campuses. Other colleges in our review have basic needs centers on campus that assists students with accessing SNAP, among other resources.

Officials from the colleges we contacted shared examples of individualized application support that they have found helpful:

- **Prescreening students for eligibility.** Officials from some of the colleges we contacted said they found it helpful to prescreen individual students for potential SNAP eligibility before students begin the SNAP application process. One of the colleges we contacted has established a SNAP outreach and technical assistance team made up of basic needs center staff and student interns. Both student interns and staff

received training on how to prescreen students for SNAP eligibility. Officials added that it is particularly helpful to have student interns trained on SNAP eligibility, because they can often speak first-hand with other students about their experience applying for benefits.

- **SNAP application interview assistance.** College officials told us that students face challenges scheduling interviews because their class and work schedules are often busy and frequently change. Officials from one college told us that the basic needs center staff schedule student interviews directly with the county SNAP agency for those students who the college has prescreened. The county SNAP office holds dedicated interview slots for student interviews. A SNAP county worker then calls each student at their scheduled time.
- **Tracking students' application status.** Officials from some of the colleges we contacted told us about methods they use to leverage students' SNAP application status to tailor their assistance to students. Officials from colleges that are approved SNAP outreach partners told us that they have access to certain information in the state's SNAP application system. For example, the basic needs center staff from one college told us they can see whether student applicants have scheduled an interview or are missing verification documents, which allows them to tailor their assistance accordingly. Officials from another college we contacted told us the school has a data sharing agreement with the county's SNAP agency, and they work closely with SNAP agency staff. At the end of each month, the county SNAP agency gives the college a report with information on the status of each student's SNAP application, including whether it is pending, denied, approved, or enrolled and reasons for these determinations. The basic needs center staff can then assist students as needed.

Some state SNAP agencies described efforts in their FNS-approved outreach plans to help college students better understand their eligibility, including by developing student-specific websites and training. For example:

- One state plan includes a project to create a website designed for college staff and students. This website is intended to provide easy-to-understand information about student SNAP eligibility and how to apply. Officials from a SNAP outreach partner we contacted told us it maintains a similar website that includes a helpdesk feature. This feature allows college SNAP outreach staff who assist students to submit a ticket for help with specific questions. Another state described efforts to assist students with an online tool that integrates SNAP eligibility screening with answers to the most frequently asked questions. It also integrates live chat, text messaging, and email to help answer questions.
- One state plan described efforts to provide training to college staff on student eligibility criteria, the application process, and the student-specific resources available. This state also described training student interns on SNAP so that they can also assist with outreach activities and provide information to their peers. Another state described efforts to provide in-person application assistance and case management for college students by creating a cadre of college SNAP ambassadors to be trained on student eligibility prescreening and application support.

Conclusions

The federal government invests billions of dollars annually in higher education to help low-income students pay for college. Even with this federal support, Education data show a substantial share of low-income college students were food insecure in 2020, and studies suggest they may suffer academically as a result. SNAP can be an important source of support for low-income students, yet we previously reported that a majority of students who are potentially eligible have not reported receiving benefits. One important way to increase

benefit uptake is direct outreach to those who are potentially eligible. Both Education and FNS have taken steps to encourage states and colleges to do so, but gaps in planning and execution remain.

FAFSA Simplification Act provisions created new avenues for Education to use FAFSA data to help connect students with SNAP benefits. However, without a written plan, Education may not be prepared to implement FAFSA data sharing with SNAP administrators, especially considering the complex, multi-step nature of this work. Additionally, without evaluating its approach—in consultation with FNS—Education’s efforts to notify FAFSA applicants of their potential SNAP eligibility may not be reaching students who could benefit from the information. Further, by sharing information about this new FAFSA notification with state and college officials, Education could better prepare them to support students and improve their SNAP outreach efforts.

FNS has also encouraged state SNAP agencies to enhance their college student outreach and enrollment efforts. However, FNS has not provided guidance about how to use student FAFSA or SNAP data in accordance with federal laws and regulations. As a result, students experiencing food insecurity may remain unaware that they could be eligible for SNAP. Better supporting these students will also help USDA and Education meet their respective goals and make good use of the substantial federal investment in higher education while improving the health and wellbeing of students experiencing food insecurity.

Recommendations for Executive Action

We are making a total of five recommendations, including three to Education and two to USDA. Specifically:

The Secretary of Education should develop a written plan for implementing provisions in the FAFSA Simplification Act related to sharing FAFSA data with SNAP administrators, to aid in benefit outreach and enrollment assistance. (Recommendation 1)

The Secretary of Education should, in consultation with USDA, evaluate its approach to identifying and notifying FAFSA applicants who are potentially eligible for SNAP benefits and adjust its approach as needed. (Recommendation 2)

The Secretary of Education should inform colleges and state higher education agencies that FAFSA notifications are being sent to applicants who are potentially eligible for SNAP benefits. (Recommendation 3)

The Administrator of USDA’s Food and Nutrition Service should, in consultation with Education, issue guidance to state SNAP agencies—such as in its SNAP outreach priority memo—to clarify permissible uses of student data, including FAFSA data, for SNAP outreach and enrollment assistance. (Recommendation 4)

The Administrator of USDA’s Food and Nutrition Service should issue guidance to state SNAP agencies—such as in its SNAP outreach priority memo—to clarify the permissible uses and disclosure of SNAP data to support SNAP student outreach and enrollment assistance. (Recommendation 5)

Agency Comments

We provided a draft of this report to Education and USDA for review and comment. USDA provided technical comments, which we incorporated as appropriate. Education did not provide comments on the report.

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 appropriate congressional committees, the Secretary of Education, the Secretary of Agriculture, and other interested parties. 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. 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 I.

A handwritten signature in black ink, reading "Kathryn A. Larin". The signature is fluid and cursive, with the first name "Kathryn" and last name "Larin" clearly distinguishable.

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

Appendix I: GAO Contacts and Staff Acknowledgments

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Staff Acknowledgments

In addition to the above, Nora Boretti (Assistant Director), Karissa Robie (Analyst in Charge), Angel Cui, and Margaret Hettinger made significant contributions to this report. Also contributing to this report were Andrew Bellis, Gina Hoover, Joy Solmonson, Alexandra Squitieri, and Curtia Taylor.

Related GAO Products

Supplemental Nutrition Assistance Program: Estimated Eligibility and Receipt Among Food Insecure College Students. [GAO-24-107074](#) Washington D.C.: June 24, 2024.

Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits. [GAO-19-95](#) Washington D.C.: December 21, 2018.

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