


FAMILY INVESTMENT ADMINISTRATION

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State Plan Implications?	No.

 <p>Maryland Department of Human Services</p> <p>Department of Human Services 25 S Charles Street Baltimore MD 21201</p>	<p align="center">FAMILY INVESTMENT ADMINISTRATION (FIA) INFORMATION MEMO</p>
<p>Control Number: # 26-18</p>	<p>Effective Date: Immediately Upon Release Issuance Date: June 29, 2026</p>

**TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS)
DIRECTORS, LDSS DEPUTY/ASSISTANT DIRECTORS FOR
FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS AND
CASE MANAGERS**

FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR



RE: STUDENT ELIGIBILITY CLARIFICATIONS

**PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE
PROGRAM (SNAP)**

ORIGINATING OFFICE: OFFICE OF PROGRAMS

SUMMARY

The Family Investment Administration (FIA) updated the SNAP Program Manual, Section 102, Students, to ensure alignment with federal regulations ([7 CFR § 273.5](#)) and guidance. Policy memos from the United States Department of Agriculture (USDA) issued on June 2, 2022, February 7, 2023, and December 20, 2024, clarified several aspects of SNAP student policy and related eligibility rules. The purpose of this Information Memo is to highlight for staff the major changes and clarifications impacting students' access to SNAP benefits in Maryland. These changes include how to determine enrollment in an institution of higher education; calculating average weekly work hours for the student policy employment exemption; clarifying the exemptions for physical or mental unfitness and work study; and how meal plans interact with SNAP eligibility.

POLICY

Clarifications of Student Eligibility Policies

Individuals who are enrolled at least half-time in an institution of higher education are considered students and are **ineligible to receive SNAP benefits** *unless* they meet certain exemptions.

Enrollment in an Institution of Higher Education

In two policy memos, USDA clarified what constitutes enrollment in an institution of higher education (IHE) for SNAP eligibility purposes. Whether an individual is considered enrolled in an IHE for SNAP eligibility purposes is defined by three criteria: enrollment status, the type of school, and the type of curriculum. USDA provided this [flowchart](#) as a reference for determining whether an individual is enrolled in an IHE for SNAP eligibility purposes. **The student policy doesn't apply to anyone not enrolled in an IHE.** When the student policy doesn't apply, the customer **is eligible for SNAP benefits, provided they meet all other eligibility criteria.**

A. Enrollment Status

Individuals enrolled less than half-time at any type of school are not considered to be enrolled in an IHE and therefore are not subject to the student policy. Such individuals are eligible for SNAP benefits provided they meet all other eligibility criteria. Enrollment status (part-time, half-time, or full-time) is determined by each IHE.

a. Type of School and Type of Curriculum

- i. *Business, trade, technical, or vocational school:* An individual is considered enrolled in an IHE if they are enrolled at least half-time in a business, technical, trade, or vocational school in a curriculum that normally requires a high school diploma or equivalent for enrollment.

Individuals enrolled in these types of schools, but in a curriculum that does *not* normally require a high school diploma or equivalent, are not considered enrolled in an IHE. They are not subject to the limitations of the student policy. They are eligible for SNAP benefits, provided they meet all other eligibility criteria.

- ii. *College or university that offers degrees:* An individual is considered enrolled in an IHE if they are enrolled at least half-time in a regular curriculum at a college or university that offers degrees, regardless of whether a high school diploma is required.

Individuals enrolled at a college or university in a program outside of the regular curriculum are not considered enrolled in an IHE. They are not subject to the limitations of

the student policy. They are eligible for SNAP benefits, provided they meet all other eligibility criteria.

Examples of programs outside of the regular curriculum include the following:

1. Remedial courses,
2. Continuing or community education,
3. Professional development,
4. Basic adult education,
5. English as a second language, and
6. Workforce development and training.

Exemptions from Student Policy

There are several exemptions to the student policy. Any individual meeting one or more of the conditions listed in this section is eligible for SNAP benefits regardless of their school enrollment status, the type of school, and the type of curriculum that they are enrolled in, provided that they meet all other eligibility requirements. More detailed clarification is provided for the exemptions for physical or mental unfitness, employment, and work study.

A. Physically or Mentally Unfit Exemption

A student who is physically or mentally unfit to work while enrolled in an institution of higher education is eligible for SNAP, provided they meet all other eligibility criteria. An individual is considered physically or mentally unfit if:

- a. They are receiving temporary or permanent disability benefits issued by governmental or private sources;
- b. The unfitness is evident to the case manager;
- c. Verification of the inability to work due to physical or mental unfitness is provided. Verification is only needed if the unfitness is not evident or is questionable. The following are acceptable sources of verification:
 - i. [500 Medical Form](#);
 - ii. Statement from a physician, physician's assistant, nurse, nurse practitioner, designated representative of the physician's office, a licensed or certified psychologist, a social worker, or other mental health professional;

- iii. Letter from the school's disability or accommodations office; and
- iv. Collateral contact, as a last resort (see [SNAP Manual Section 408.102](#) for a definition of collateral contact).

B. **Employment Exemption**

A student who is employed for an average of 20 hours per week and paid for the employment or, if self-employed, working an average of 20 hours per week and receiving weekly earnings at least equal to the federal minimum wage multiplied by 20 hours is exempt from the student policy.

[SNAP Manual Section 102](#) is updated to permit the averaging of weekly work hours over either the last 30 days **or** the three full months preceding application, detailed below, using whichever method results in the highest average number of hours worked per week. **This is a change from the prior policy** that required calculating the average weekly hours using the hours worked in the past 30 days. FIA expects that this policy change will enable more students to qualify for an employment exemption and receive SNAP benefits.

a. ***Calculating Average Weekly Hours/Income over a Quarter***

To calculate the average hours worked per week over a quarter, total the number of hours worked across the last three full months before the date of application. Divide that total by 12 (using a standardized four weeks per month), and the result is the average weekly hours. For example, a student applying on August 25 worked 55 hours in July, 100 hours in June, and 109 hours in May. Together, this is a total of 264 hours, which yields an average of 22 hours per week when divided by 12. The average weekly hours must be entered on the Income screen in E&E.

When average work hours are calculated, case managers must use the fluctuating income calculation detailed in [SNAP Manual section 213.3\(C\)](#). If the number of hours that a student works is based on an average, the corresponding average income amount must also be calculated and entered on the Income screen in E&E. This can be done in one of two ways:

- i. Complete the same calculation that was done to determine the average number of hours, but using the gross income amounts; or

- ii. Multiply the calculated average number of hours by the hourly rate of pay.

Example 1: Student A applies for SNAP on April 1. They are a full-time student who also works at Walmart, where they are paid weekly, earning \$15 per hour. Their paychecks from the last three full months show the following hours and gross earnings:

Most Recent 3 Months	Week 1		Week 2		Week 3		Week 4		Monthly Total	
	Hours	Amt	Hours	Amt	Hours	Amt	Hours	Amt	Hours	Amt
March	18	\$270	18	\$270	18	\$270	17	\$255	71	\$1065
February	24	\$360	21	\$315	22	\$330	19	\$285	86	\$1290
January	24	\$360	17	\$255	20	\$300	22	\$330	83	\$1245

Using only the last 30 days (March), the average number of hours worked per week is **17.75 hours** (71 total hours worked in March divided by four weeks).

When calculated over a quarter (the last three full months), the average number of hours worked per week is **20 hours** (71 + 86 + 83 = 240 total hours divided by 12 weeks).

Using the average weekly hours calculated over a quarter rather than over the last 30 days, Student A meets the requirement of working an average of 20 hours per week, making them exempt from the student policy and eligible for SNAP benefits, provided they meet all other eligibility criteria.

Continuing this example, the case manager would next calculate Student A's average weekly income over the last calendar quarter and enter it into E&E. Student A earned an average of **\$300 per week** (\$1,065 + \$1,290 + \$1,245 = \$3,600 total income for the quarter divided by 12 weeks).

b. **Self-Employment**

Self-employed students must work an average of 20 hours per week and have average weekly earnings at least equal to the federal minimum wage multiplied by 20 hours to qualify for the employment exemption. The federal minimum wage is \$7.25 per hour, so the student must earn at least \$145 per week when averaged over either the past 30 days or the prior three full

months, regardless of how many hours they report working.

Example 2: Using the table from Example 1, imagine Student A is self-employed instead of working at Walmart. From the calculations done in Example 1, we know that Student A worked an average of 20 hours per week, when calculated over a quarter, and earned an average of \$300 per week. Dividing \$300 by \$7.25 (federal minimum wage) equates to **41 hours per week**. Therefore, Student A meets the requirement to be exempt from student policy due to self-employment and is eligible for SNAP, provided all other eligibility criteria are met.

Example 3: Student B is a self-employed student earning an average of \$100 per week. Since \$100 divided by \$7.25 results in 13.79, Student B is found to work an average of **14 hours per week** by federal minimum wage standards. Regardless of how many hours per week they report working, their self-employment does not exempt them from the student policy because their weekly earnings are equivalent to less than 20 hours per week at the federal minimum wage. Student B is not eligible for SNAP benefits unless they qualify for a different exemption under the student policy.

C. **Work Study Exemption**

Under this exemption, a student participating in a state or federally-financed work study program during the regular school year is eligible for SNAP, provided they meet all other eligibility criteria.

- a. The Federal Work-Study Program provides part-time employment for undergraduate, graduate, and professional students with financial need. Students must fill out the Free Application for Federal Student Aid (FAFSA) to apply for federal work study. As long as there is some federal funding involved, a work study program is considered to be federally financed. Maryland does not currently have any state-financed work-study programs.
- b. Three criteria must be met for a student to be considered participating in a work study program and eligible for this exemption:
 - i. The student must be approved for work study at the time of the SNAP application,

- ii. The work study must be approved for the school term, and
- iii. The student must anticipate actually working the work study job during the school term.
 - 1. Anticipation of working the work study job means that the student has verified that they are working with their institution of higher education to establish a work study placement, but have not begun work yet.

Note: Unlike the employment exemption that requires a minimum number of hours, there is no minimum number of hours that must be worked to qualify for the work study exemption.

- c. Verification of work study participation (or anticipated participation) is not required unless the information provided by the student is considered questionable. Under these circumstances, the case manager must verify the questionable information before certifying the household. Acceptable sources of verification include (but are not limited to):
 - i. Financial aid award letter;
 - ii. Documentation from the school;
 - iii. Letter from the work study employer; and
 - iv. Written attestation from the student (if no other verification is available).
- d. Work study income is excluded for SNAP eligibility purposes (see [SNAP Manual Section 211 Excluded Income](#)).

D. Other Exemptions

In addition to the three exemptions to the student policy described above, the following conditions are grounds to exempt a student from the limitations of the student policy. Students meeting any of these conditions are eligible for SNAP benefits, provided that all other eligibility criteria are met:

- a. Age 17 or younger or age 50 or older;
- b. Receiving Temporary Cash Assistance (TCA);
- c. Participating in the Job Opportunities and Basic Skills program

- under Title IV of the Social Security Act or its successor program;
- d. Participating in on-the-job training programs (including AmeriCorps);
- e. Responsible for the care of a dependent household member under the age of 6;
- f. Responsible for the care of a dependent household member who is 6 to 11 years old when child care is inadequate for the student to attend class and comply with the work requirements;
- g. Single parents enrolled full-time in an institution of higher education and responsible for the care of a dependent child under age 12 (if no natural, adoptive, or stepparent is in the SNAP household with the child, another household member may qualify for this exemption if they have parental control over the child and are not living with their spouse)
- h. Participating in a:
 - i. Program under the Job Training Partnership Act of 1974,
 - ii. Program under section 236 of the Trade Act of 1974, or
 - iii. SNAP Employment and Training (E&T) program for low-income households that is operated by a state or a local government, where one or more of the components of the program is at least equivalent to an acceptable SNAP employment and training program component.

Treatment of Meal Plans at Institutions of Higher Education

Per USDA guidance, students in institutions of higher education may not be denied SNAP benefits solely because they participate in a mandatory or optional meal plan. Case managers must determine how many meals the student can receive per week under their selected meal plan.

A. Investigating the Scope of Meal Plans

Individuals who receive the majority of their meals (more than half of the 21 meals per week) through a meal plan are considered residents of an institution and are not eligible for SNAP benefits (see [SNAP Manual Section 100.63](#)). Students who receive less than half of their 21 meals per week may be eligible for SNAP, provided they meet all other eligibility requirements.

3 meals per day x **7** days per week = **21** total meals per week

Half of **21** total meals per week = **10.5** meals per week

- B. In the Eligibility & Enrollment (E&E) system, the case manager must select the following Living Arrangements on the Individual Details screen:
- a. Select “**Boarding School**” if, after reviewing their meal plan, the student is considered a resident of an institution. This will ensure that the student is denied for an invalid living arrangement.
 - b. Select “**At Home**” if a student is not considered to reside in an institution based on their meal plan.

REFERENCES

[SNAP Manual Section 100.63](#)

[SNAP Manual Section 102](#)

[SNAP Manual Section 210](#)

[SNAP Manual Section 408.102](#)

[FNS Policy Memo SNAP-Questions and Answers on Student Exemptions \(December 20, 2024\)](#)

[FNS Policy Memo-SNAP Institutions of Higher Education and Student Eligibility Rules \(February 7, 2023\)](#)

[FNS Policy Memo-SNAP Clarification on Treatment of Meal Plans at Institutions of Higher Education \(June 2, 2022\)](#)

INQUIRIES

Please direct policy questions to FIA Policy by completing the FIA Policy Information Request Form. Montgomery County staff may submit their policy questions via email at fia.policy@maryland.gov.

cc: DHS Executive Staff
FIA Management Staff
Constituent Experience
DHS Help Desk
Office of Administrative Hearings



Applying for SNAP: Students in Higher Education

Updated June 26, 2026

What is SNAP?

The Supplemental Nutrition Assistance Program (SNAP) provides food benefits to eligible households to supplement their grocery budget and buy nutritious food. SNAP benefits can be used to buy food and non-alcoholic beverages at any authorized retailer. Benefits can not be used to buy hot, prepared foods.

Maryland SNAP benefits are normally only available for U.S. citizens and Green Card holders living in the State of Maryland who make less than a certain income depending on their household size. These are the **general SNAP program requirements**. Students in higher education are normally not eligible for SNAP benefits, but there are some exceptions. This document explains when students are eligible and how to apply for SNAP benefits as a student.

What are the income requirements for SNAP?

SNAP eligibility depends on your household's size and total income before taxes. The table below shows the maximum monthly income before taxes for households of one to five people in order to be eligible for SNAP. The table also shows the maximum monthly SNAP benefit amount. Not every household receives the maximum amount. Even if you qualify for SNAP, you may receive a different benefit amount. See more information at dhs.maryland.gov/snap.

Household Size	Maximum Monthly Income Before Taxes	Maximum SNAP Benefit
1	\$1,696	\$298
2	\$2,292	\$546
3	\$2,888	\$785
4	\$3,483	\$994
5	\$4,079	\$1,183

How do I apply?

You can check your eligibility and apply for SNAP online at MarylandBenefits.gov. You may need documents to verify your address, income, employment (including work study), financial aid, and class schedule. If you have questions or need help at any point when applying, contact us through your Local Department of Social Services. Find your nearest local office at dhs.maryland.gov/local-offices. We will be happy to help you apply.

What happens after I apply?

Once you submit your application, your Local Department of Social Services will reach out to you by phone, mail, or email to schedule a brief phone interview with a case manager. This interview is essential to determine if you're eligible for SNAP. If you're approved, we will mail you an Electronic Benefits Transfer (EBT) card. This is a special debit card that can only be used for authorized purchases. Your SNAP benefits will be loaded monthly onto that card.

I'm enrolled in higher education half-time or more. Am I eligible for SNAP?

If you are enrolled in a higher education school half-time or more, you may be considered a student by SNAP rules. In general, students are not eligible for SNAP. However, there are exceptions to the general rule that students are not eligible for SNAP. If you qualify for **one or more student exceptions and** you meet the general SNAP program requirements, *you are eligible for SNAP*:

1. You are 17 years old or younger;
2. You are 50 years old or older;
3. You face physical or mental health barriers preventing you from working while in school;
4. You receive Temporary Cash Assistance (TCA);
5. You are employed on average 20 hours or more per week;
6. You are participating in an on-the-job training program;
7. You are participating in a Job Opportunities or Basic Skills program under the Noncustodial Party Employment Program (NPEP), SNAP Employment and Training (SNAP E&T), or other work program funded by the federal, state, or local government;
8. You are participating in federal work study;
9. You are responsible for the care of a child under age 6;
10. You are responsible for the care of a child aged 6 to 11, **and** you don't have child care available for you to work and attend class; or
11. You are a single parent enrolled full-time and responsible for the care of a child under age 12.

We know this is a lot of information. If you are a student and have any questions about whether you are eligible for SNAP, reach out to us at your nearest office at dhs.maryland.gov/local-offices.

I'm attending school less than half-time. Am I eligible for SNAP?

Yes. If you meet all other SNAP program requirements, you are eligible for SNAP.

Does it matter what type of school or higher education program I'm enrolled in?

If you are a student over 18 and enrolled in a higher education program less than half-time, you may be eligible for SNAP. You still have to meet SNAP program requirements.

If you are enrolled in higher education half-time or more, the type of higher education program *may* impact your SNAP eligibility.

I am enrolled at a business, trade, technical, or vocational school:

Does your program or curriculum require a high school diploma or equivalent for enrollment?

- **If yes:** You *may* be eligible for SNAP. If you are enrolled half-time or more, you are considered a student. You would need to qualify for one of the Student Policy Exceptions **and** meet SNAP program requirements.
- **If no:** If you meet the general SNAP program requirements, you are eligible for SNAP.

I am enrolled at a college or university that offers degrees:

Are you enrolled in the regular curriculum?

- **If yes:** If you are enrolled half-time or more, you are considered a student. You would need to qualify for one of the Student Policy Exceptions **and** meet SNAP program requirements.
- **If no:** If you're enrolled in a program outside of the regular curriculum, such as remedial courses, continuing or community education, professional development, or English as a Second Language then you *are not* considered a student. You still have to meet SNAP program requirements.

I live off campus with my parents. Are they considered part of my household?

If you live with your parents, they may be considered part of your household when applying for SNAP. If you are 21 or younger and live with your parents, you must include your parents and their income on your SNAP application.

If you are 22 or older and live with your parents, it depends on whether or not you buy and share food with them.

- **If you buy and share food with your parents:** Your parents are part of your household and you must include them and their income on your SNAP application.
- **If you buy your own food:** Your parents are not part of your household and you only need to include yourself and your income on your SNAP application.

I live off campus with a roommate and we buy separate groceries. Do I need to include my roommate on my application?

No. A roommate who buys their own food is not considered part of your household for SNAP. You do not need to include them or their income on your application.

I live with my spouse or partner. Do I need to include them on my application?

Yes. Married students need to include their spouse and their spouse's income on their SNAP application.

Students who live with, purchase, and prepare food together with a domestic partner must include their partner and their partner's income on their SNAP application.

I have children. Do I need to include them on my application?

If you have children under age 22 and they live with you, include them as part of your household on your SNAP application.

I am an immigrant student. Am I eligible for SNAP?

You must be a U.S. citizen, Lawful Permanent Resident (i.e. green card holder), Cuban or Haitian Entrant, or from the Federated States of Micronesia or the Republic of the Marshall Islands to receive SNAP benefits. Some Lawful Permanent Residents must observe a 5-year waiting period before being eligible. Check to see if you are eligible at MarylandBenefits.gov.

I have a school meal plan. Am I eligible for SNAP?

It depends on your meal plan. If your meal plan covers more than 10 meals per week, you are *not* eligible for SNAP. If your meal plan covers 10 meals or fewer per week, you *may* be eligible if you meet SNAP program requirements.

I am supporting myself and my children while I'm going back to school. Am I eligible for SNAP?

You *may* be eligible. If any of the following situations apply to you **and** you meet SNAP program requirements, you are eligible for SNAP:

- You are responsible for the care of a child under age 6;
- You are responsible for the care of a child aged 6 to 11, **and** you don't have child care available for you to work and attend class; or

- You are a single parent enrolled full-time and responsible for the care of a child under age 12.

I am working an off-campus job while in school. Could I be eligible for SNAP?

You *may* be eligible for SNAP. Working while attending school can help you qualify for SNAP by exempting you from the general rule that students are not eligible for SNAP.

You must have worked an average of 20 hours or more per week in either the 30 days before applying for SNAP, or the most recent three full months before applying for SNAP. When you apply for SNAP, we will calculate your average weekly hours using both periods of time and use the one showing the highest average weekly hours worked.

For example, if you apply for SNAP in September, we will calculate your average weekly hours using both the hours you worked in June, July, and August, as well as just the hours you worked in the last 30 days before applying. If either average is 20 hours or more per week, you qualify for the exemption. If the average is less than 20 hours per week, you do not qualify for this exemption; however, you may still qualify for a different exemption.

I am approved for work study, but I do not have a current work study job. Could I be eligible for SNAP?

Yes. If you are approved (accepted or awarded) for federal work-study, anticipate working, and have not refused a work study assignment, you are eligible for SNAP if you meet SNAP program requirements.

Does it matter how many hours a week I work in my work study job?

No. Simply participating in federal work study is enough to exempt you from the general rule that students are not eligible for SNAP. The number of hours worked in your work study assignment does not impact your eligibility for SNAP.

I am an out-of-state student, but I live in Maryland during the school year. Could I be eligible for Maryland SNAP?

Yes. Out-of-state students may be eligible for Maryland SNAP if they are living in Maryland for the school year. You must meet all other eligibility requirements, just like any other Maryland student.

As a student, are there benefits other than SNAP that could help me?

Yes. You may be eligible for other programs like cash assistance, child care, child support, health insurance, and energy assistance. We encourage you to check your eligibility and apply for benefits at MarylandBenefits.gov.