

# Education and Training Count

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State Strategies for SNAP &  
Medicaid Work Requirements

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## Executive Summary

The 2025 budget reconciliation act, H.R. 1 or the One Big Beautiful Bill Act (OBBBA) expanded time limits under the Supplemental Nutrition Assistance Program (SNAP) and created a new Medicaid community engagement requirement (CER) that will create new barriers for people seeking economic security through education and training. According to the 2024 American Community Survey, 3.4 million adults 18-64 attended college and received Medicaid, 2.3 million attended college in SNAP households, and 1.2 million were in both. Many will be subject to one or both new requirements.

SNAP and Medicaid treat education differently. SNAP has three separate provisions tied to educational programs that have contradictory effects. The student exclusion limits college students' ability to access SNAP, though exemptions can narrow this restriction.

Meanwhile the work-registration and time-limit exemption protects students attending at least half-time from the three-month time limit without requiring hour tracking, while designation as a qualifying work program allows participation in approved programs to count toward the 80 hours per month requirement for less than half-time students.

Medicaid's CER cross-references the SNAP qualifying work program list and adds a separate pathway for half-time enrollment in an Institution of Higher Education (IHE), a career and technical education (CTE) program as defined under the Perkins Act and – under the implementing regulations—high school and state-approved high school equivalency programs. A given program may qualify under one, several, or all four provisions, and a student may be protected under one program but not the other.

### Five recommendations for states

1

**Develop protections through multi-agency partnerships.** SNAP and

Medicaid agencies are not experts in education and workforce development.

They need to partner with state workforce boards, higher education authorities, and other relevant entities to develop streamlined processes for administering these exemptions as well as lists of qualifying programs.

2

**Leverage existing classifications to automatically count programs.** Use

existing federal and state lists — the Federal School Code List, Perkins-funded program inventories, federal access programs, and the Workforce Innovation and Opportunity Act (WIOA) Eligible Training Provider List — to populate

qualifying-program rosters automatically. Provider-initiated certification should be a supplement, not the starting point.

3

**Count each program under every pathway it satisfies.** Each pathway has different tests and serves different student populations. If programs are only certified through one pathway, some students will fall through the cracks and miss out on benefits they could receive. States should screen against all pathways at once.

4

**Build operational infrastructure to support students and eligibility workers.** Joint SNAP/Medicaid guidance is essential to address complicated cases where the two programs are not aligned. When hours of participation must be documented, states should minimize burden. If possible, hours should be reported directly from programs to eligibility systems. The Temporary Assistance for Needy Families (TANF) experience with documenting hours provides lessons on dos and don'ts.

5

**Communicate options clearly and widely.** Plain-language explainers should be distributed through benefit agencies, college financial aid offices, and student support services. The implementation of these new requirements offers a rare moment when students, advocates, and the broader public are paying attention to benefit administration; states should take advantage of it.



# Introduction

Higher education and training that leads to recognized credentials are widely recognized as important pathways to higher wages, more steady employment and economic security. In recent years, adult students in low-income households have increasingly been able to access health insurance through Medicaid, when they are not covered by a spouse or parent's plan. There has also been increasing recognition of the role that food assistance under SNAP can play in helping people meet their basic needs while in school.

In the 2024 American Community Survey<sup>1</sup>, 3.4 million adults 18-64 reported that they attended college (including graduate school) and received Medicaid. 2.3 million reported that they attended college and were in a household where at least one person received SNAP. The overlap between these was 1.2 million people, and an additional 237,000 post-secondary students who were in SNAP households were uninsured. These figures do not take into account people seeking post-secondary training or credentials outside of regular educational institutions.

But many individuals seeking economic security through education and training will soon find themselves running into new barriers to accessing Medicaid under HR1/OBBBA, as well as long-standing restrictions on accessing SNAP benefits. This is true even though Congressional intent was to protect students' access to Medicaid, both regular college students and those in career and technical education. While the National Student Clearinghouse may be available to help identify full-time and half-time college students,<sup>2</sup> there is no reliable source of data for enrollment in private career and technical education, in high school and equivalency programs, or that will track hours of participation for less than half-time students. Therefore, many students who meet the new requirements will still lose benefits because of the reporting requirements.<sup>3</sup>

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<sup>1</sup> Original analysis of ACS data, accessed via IPUMS USA, University of Minnesota, [www.ipums.org](http://www.ipums.org). The ACS asks whether respondents are currently attending "regular school or college," explicitly excluding vocational and trade programs. Our sample is those who say yes and report attendance at the college undergraduate or graduate level. This includes both full-time and part-time students at two- and four-year institutions but does not distinguish degree-seeking from non-degree-seeking enrollment.

<sup>2</sup> The preamble to Medicaid Interim Final Rule says that CMS is exploring options to make educational data available through the Federal Data Hub. See: IFC: *Medicaid Program: Community Engagement Requirement for Certain Individuals*, June 3, 2026. <https://www.federalregister.gov/d/2026-11094/p-513> In the meantime, the National Student Clearinghouse is offering to sell data for verification to states. National Student Clearinghouse, "Prepare for Medicaid Verifications with Trusted Education Data," blog, March 17, 2026. <https://www.studentclearinghouse.org/nscblog/prepare-for-medicaid-verifications-with-trusted-education-data/>

<sup>3</sup> Buettgens et al project losses of Medicaid for college students of between 21 and 56 percent due to the combination of six-month redeterminations and work requirements largely driven by failure to keep up with

Because the Medicaid and SNAP statutes treat education differently, the complexity of applying for and retaining benefits will increase. However, states do have choices they can make that will streamline verification and protect access to both benefit programs.

This brief begins with examining two hypothetical students to demonstrate the ways that people engaging in different types of educational programs will be affected by the requirements of SNAP and Medicaid. While these cases are made up, they represent many actual students. It then provides information on different strategies that states can adopt, with examples, and concludes with some recommendations on how states should approach this complicated policy environment. The details of the statutory and regulatory provisions are provided in the appendix.

## Case Studies

**Maria** is a 27 year old enrolled full-time in a public college in her home state. She is studying history, with the goal of going to law school. Until this year, she combined retail work and part-time school while getting her associates at the community college. Her scholarship covers her costs, but requires full-time attendance and maintaining a 3.0 average, so she told her boss that she could work during school breaks and was willing to fill in occasionally, but she couldn't work so much anymore. Her income has been well below the poverty line for years and she's been receiving both SNAP and Medicaid.

She's heard something about new requirements that people receiving benefits need to be working or going to school, but since she's a full-time student, she's pretty confident that she's doing what she needs to do and will be ok. Maybe her SNAP benefits will go up since she's working less? She uploads her latest paystub showing her reduced earnings.

On the Medicaid side, Maria is ok. Being a student enrolled at least half time at an institution of higher education or a program of career and technical education is one of the ways to satisfy the Medicaid "community engagement requirement." She gets a letter that

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reporting requirements. The range depends on how successful the state is at using existing data sources to determine participation and renew eligibility. Matthew Buettgens, Michael Karpman, Jennifer M. Haley, Jameson Carter, and Genevieve M. Kenney. *Projected Reductions in Medicaid Expansion Enrollment Under OBBA's Work Requirements and Six-Month Redeterminations: National and State Estimates for 2028*. Urban Institute, 2026. <https://www.urban.org/research/publication/projected-reductions-medicaid-expansion-enrollment-under-obbbas-work>.

scares her by saying that she might lose her Medicaid, but she sends in a copy of her class registration and eventually gets another letter saying she's been renewed for 6 months.<sup>4</sup>

However, Maria also gets another letter that says that since she's a full-time college student, her SNAP benefits have been terminated. There's a list of reasons for exception, but none of them apply to Maria. She can get her SNAP benefits back if she works at least 80 hours a month – but combining that with the demanding coursework she's taking seems impossible.

Maria has run into the student exclusion – a policy that is separate from the work requirement/time limit that was expanded under OBBBA. Students enrolled more than half-time in IHEs are ineligible for SNAP unless they qualify for an exception. As discussed below, some states have adopted policies that create exceptions for students enrolled in certain employability-enhancing programs, but Maria's history degree probably wouldn't count as it's not immediately considered career or technical education.

Maria is grateful that she can keep her Medicaid, but is confused about why SNAP is punishing her for going to college so she can get a much better job in the future. She's worked too hard to give up now, but this is putting a big hole in her budget. She already takes the bus to go to the cheaper grocery store that is further away, and buys the items that are on steep discount because they're about to expire. There's a student food pantry on campus, but the last time she went, it didn't have much on the shelves. Maybe she can take out more student loans?

**James** came to the US as a refugee and recently got his green card. He works at a warehouse, and his hours of work vary a lot. If there's no work to be done, they get sent home early. Some weeks he works 30 hours, some weeks just 10. He's asked for more hours, but they seem to keep hiring more people rather than letting anyone get to full time. He's also been taking English as a Second Language (ESL) classes, which meet from 7-10pm three days a week. He needs to improve his English to get a better job, as well as to become a citizen. James lives in a room he rents. His young daughter lives with her mother – James and her mother aren't together, but they get along fine and he spends as much time as he can with his daughter and pays a little bit of child support out of each paycheck. James has had a cough that he's been ignoring for months, since he doesn't have insurance

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<sup>4</sup> If the state is using the National Student Clearinghouse, Maria might not need to send in this information. However, depending on the timing of the letter and her enrollment, the Clearinghouse data might still show her as a less than half-time student

and doesn't want to wind up with a big medical bill. But it's been getting worse, and he's missed some work (and doesn't get paid for sick days). His ex told him that he's being stupid and he probably qualifies for Medicaid, so he finally applied.

The Medicaid application asks for his income for last year, which he's able to figure out from his taxes, and for his two most recent paystubs. But after the Christmas rush, the last months have been slow, and he's only been working about 15 hours a week – even less now that he's been sick. When he gets the notice saying that his application has been rejected, there's a number to call with questions. He has a question – this notice says that he needs to be doing 80 hours a month of work, community service, or school – so can he add the 9 hours of ESL classes a week to his work hours?

After sitting on hold for what seems like hours, someone finally answers the call and she really wants to help him. He explains his situation. She goes through a list of questions that she says is to see if he might qualify for an exemption, but his answer is no to all of them. She enters his earnings, but since he's been out sick, they fall quite a bit short.

He finally asks his question about whether the time spent in ESL class can count. She says maybe, and asks for the name of the program where he is studying. But after some more typing, she comes back and says no, the program doesn't count.

He's about to give up, when the caseworker says wait, would you like to apply for SNAP as well? He's about to say no—he's been on SNAP in the past, and generally only got a little bit each month, and it doesn't seem worth the bother – when she stops him and explains. If he applies for SNAP and is approved, he will be subject to SNAP's work requirements.<sup>5</sup> That will make him exempt from the Medicaid requirement, so she can approve him for six months of health insurance. He may or may not be able to keep the SNAP benefits for more than 3 months – it depends on how his hours of work play out – but at least he can see a doctor for now. And if it turns out that the cough is something serious, it might qualify him for a longer exemption.

James says sure. This requires additional questions about his rent, his child support, and so on, but eventually the caseworker confirms that he's all set. She explains that he'll need to report his hours of work and earnings each month.

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<sup>5</sup> Under §1902(xx)(9)(A)(ii)(VI)(bb), a person who is a member of a SNAP household and is not exempt from a SNAP work requirement is automatically exempt from Medicaid CER. The Medicaid interim final rule confirms that this includes people who are accruing countable months, and not yet timed out, not just those who are actively meeting the requirement. However, the Centers for Medicare and Medicaid Services (CMS) has not yet provided guidance on how states should handle people who apply for both programs at once and so will not yet show up as SNAP recipients in a computer check.

# The Cross-Program Disconnect

These two stories were selected to highlight how the different rules under SNAP and Medicaid can result in surprising interactions. In Maria's case, the fact that she is attending college full-time counted for her Medicaid participation requirement – but disqualified her from SNAP. For James, his ESL program didn't count for either program – but his SNAP enrollment made him exempt from the Medicaid requirement. If instead of taking a ESL course, he had been taking one or two classes at a community college, those classes would count toward the Medicaid requirement, but not for SNAP unless the specific program was certified by the SNAP agency. And if he was taking a training program that the SNAP agency had certified, it would count for both programs.

The fundamental issue is that Congress has taken contradictory stances towards students receiving SNAP, and both positions are incorporated into the law. Congress has worried that students from well-off families who are only temporarily impoverished will take advantage of SNAP and therefore created the student exclusion. Congress has also recognized that education and training is a critical pathway to economic security, and therefore exempted students from the time limit, and created exemptions from the student exclusion. The result is that the SNAP statute and the implementing regulations discuss school attendance in three places, with different language in each one: the student exclusion, the work requirement/time limit exemption, and time limit compliance through a qualifying work program. These provisions are independent – a program that is covered by one may or may not be covered by the others. The new Medicaid community engagement requirement clearly reflects Congressional intent to allow people to meet the requirement through education, but cross-references only one of the SNAP provisions and also brings in its own separate language. The appendix tables provide detailed information on these provisions.

However, states have power to bring these policies into closer alignment, reducing the confusion for both applicants and caseworkers, and reducing the number of people who will be at risk of losing or being denied key health and nutrition supports.

1. A qualifying work program designation under SNAP §273.24(a)(3)(iii) automatically counts for Medicaid CER Pathway C by statutory cross-reference. Hours of participation in programs with this designation count towards both requirements, regardless of whether the recipient is receiving both programs. By adding programs to this list now, states can prepare for the Medicaid CER implementation next year.
2. Both SNAP and Medicaid use the Perkins Act definition of Career and Technical Education, although in different ways. Programs need not receive Perkins funding to

qualify — only to meet the statutory definition. It makes sense for states to create rosters starting with programs that receive such funding, but they should not limit their rosters to such programs. Identifying additional CTE programs will support access to both programs.

3. One of the most confusing parts of the program intersection is the differential treatment of college enrollment. States can minimize this gap by using the flexibility under SNAP to determine certain programs as exempt from the student restriction and/or by being clear that a SNAP finding that a program is “outside the regular curriculum” of an IHE does not preclude it from counting for Medicaid.

The next section of this paper highlights strategies that different states have adopted that allow more education and training programs to count for SNAP purposes. The statutory cross-linkage under Pathway C means that these strategies will also support students and workers subject to the Medicaid requirements.

## State Strategies

### Limiting the Student Exclusion: Massachusetts and More

Under §6(e) of the Food and Nutrition Act (FNA) and the corresponding regulations at 7 CFR §273.5, any person enrolled at an institution of higher education at least half-time is ineligible for SNAP unless they meet one of the exemptions under 7 CFR §273.5(b). While many of the exemptions are based on a personal characteristic of the recipient (employment, age, disability, caregiving responsibilities), others are based on characteristics of the educational program. For more than a decade, states have used their authority to determine which programs qualify students for an exemption to limit the reach of the student exemption. This has been driven by the recognition that a growing share of college students are from families with modest incomes and that hunger and food insecurity are disturbingly prevalent among college students.<sup>6</sup> Moreover, postsecondary credentials have become increasingly necessary for stable well-paid jobs.

7 CFR §273.5(b)(11) contains the primary basis for exemptions to the student exclusion based on the type of program rather than a characteristic of the student. (See appendix table 1 for the full list.) In the past decade, an increasing number of states have adopted strategies that do not require individual students or their caseworkers to assess each

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<sup>6</sup> Government Accountability Office. *Supplemental Nutrition Assistance Program: Estimated Eligibility and Receipt among Food Insecure College Students*. GAO-24-107074. 2024. <https://www.gao.gov/products/gao-24-107074>.

possible educational program to see if it qualifies, but instead uses existing institutional and program structures to confer the exemption automatically.

Since 2010, Massachusetts has determined that most community college programs meet the requirement under 7 CFR §273.5(b)(11)(iv) of being an “education and training program for low-income households that is operated by a state or local government” and therefore qualify students for an exemption from the student exclusion. The state delegated the program-by-program determination to the colleges recognizing that SNAP caseworkers neither have the capacity nor the expertise to make individualized judgments about courses of study, but that colleges routinely make these decisions.<sup>7</sup> SNAP recipients can attend community college half-time or more without losing eligibility under the student exclusion. Moreover, they remain exempt from the work registration requirements and time limits, including during school breaks, so long as they plan to return.

Since that time, other states have adopted similar processes. For example, in 2018, Pennsylvania adopted a policy to count programs at community colleges that were determined to meet the federal definition of career and technical education under the Perkins Act, or that were associated with Pennsylvania’s list of in-demand or “high priority” occupations that can pay a family supporting wage.<sup>8</sup> Now, the Department of Human Services publishes a list of specific federal and state programs whose participants automatically qualify for the student exemption. The current list includes federal access programs (TRIO Upward Bound, GEAR UP, TRIO Student Support Services at specified institutions, TRIO McNair Scholars and the Kessler Scholars Program at the University of Pittsburgh), federal adult education funding (Title II Adult Basic Education), foster youth supports (Chafee ETG and the Fostering Independence Tuition Waiver), and Pennsylvania-specific state programs (Act 101 and ELECT).<sup>9</sup> Because each of these programs is for low-income or disadvantaged households, the “for low-income households” requirement is met.

Other states have adopted variants of these approaches for identifying exempting programs. Some have used the fact that programs receive funding under the Perkins Act to show that they are career-focused. Some have used participation in TRIO, state-specific scholarships, or other low-income-targeted programs as an indicator that they meet the

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<sup>7</sup> Ashley Burnside, Parker Gilkesson, and Patricia Baker. *Connecting Community College Students to SNAP*. CLASP and MLRI, 2021. <https://www.clasp.org/publications/report/brief/connecting-community-college-students-snap/>.

<sup>8</sup> Pennsylvania Department of Human Services, Operations Memorandum #18-03-04, March, 2018, [c\\_271849.pdf](#). See also Burnside, Gilkesson and Baker, 2021.

<sup>9</sup> Pennsylvania Department of Human Services, “SNAP for College Students,” <https://www.pa.gov/agencies/dhs/resources/snap/snap-college-students> Accessed May 5, 2026.

(b)(11)(iv) standard. California uses receipt of TANF-funded CAL Grant A and Cal Grant B as a basis for an exemption and also has a long list of programs at both two- and four-year schools that can be considered “local programs that increase employability.”<sup>10</sup>

In February 2023 and December 2024, FNS issued guidance clarifying which individuals are considered enrolled in an IHE for purposes of the student exclusion. The 2023 memo lifted up the three criterion test embedded in §273.5(a) – enrollment status, type of school, and type of curriculum – and highlighted that some programs offered at a community college are not part of the “regular curriculum” and therefore that participants in these programs are not subject to the student exclusion, and therefore do not need to meet an exemption. The memo specifically identified remedial education, continuing/community education, professional development, ESL, and workforce development as commonly outside a college's "regular curriculum." The December 2024 Q&A went further: at Question 18, FNS clarified that certificate and associate-degree programs that are part of CTE programs are also typically outside a college's regular curriculum.

This guidance did not discourage the (b)(11)(iv) approach; rather, it identified a separate basis on which many CTE and adult education students are protected from the student exclusion. For these populations, the question is not "which exemption applies?" but "are they subject to the student exclusion in the first place?" For students whose programs are part of the regular curriculum (generally degree-credit programs, including degree-credit CTE), the (b)(11)(iv) approach still provides protection.

Two factors may now complicate the question of whether programs are “outside of the regular curriculum.” First, enrollment at least half time at an IHE is one way to meet the new Medicaid requirements. While the Medicaid statute uses different language to define an IHE – it uses the HEA section 101 definition and does not include the reference to a “regular curriculum” – it may be operationally challenging for states to determine that an individual is attending an IHE for Medicaid purposes but not for SNAP. Secondly, the requirements of the new “workforce Pell” option created under OBBBA may encourage colleges to make more workforce-oriented programs credit-granting, to support credential stacking.<sup>11</sup> This may result in fewer programs being determined to be outside the regular curriculum.

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<sup>10</sup> BenefitsCal Student Center, <https://benefitscal.com/StudentCenter/Home>, Accessed May 5, 2026.

<sup>11</sup> Lindsey Reichlin Cruse, *MAKING THE MOST OF WORKFORCE PELL How States Can Make Sure The New Law Delivers On Its Promise*. National Skills Coalition, 2026. [https://nationalskillscoalition.org/wp-content/uploads/2026/05/WFPellPolicy\\_brief-F.pdf](https://nationalskillscoalition.org/wp-content/uploads/2026/05/WFPellPolicy_brief-F.pdf).

Therefore, states should continue to identify mechanisms for identifying programs that qualify students for exemptions based on 7 CFR 273.5(b)(11), rather than solely relying on findings that certain programs are not considered part of the regular curriculum. For example, Workforce Pell itself may serve as an additional indicator of programs that should qualify participants for an exemption from the student exclusion. Partnerships with educational and workforce agencies will be helpful in understanding the details of different programs and pathways and developing guidelines that do not require SNAP and Medicaid caseworkers to become experts on education and training programs.

#### **SNAP/Medicaid Interaction:**

SNAP and Medicaid use different IHE definitions and different mechanisms for protecting students. SNAP eligibility turns on whether a program is part of a college's "regular curriculum" or qualifies participants for an exemption from the student exclusion under §273.5(b)(11). Medicaid Pathway D counts programs that meet either the HEA §101 definition or the Perkins CTE definition (as well as high school and equivalency programs). There is no formal cross-program linkage between these determinations. Operationally — and to keep the rules comprehensible to students and eligibility workers — states should align determinations across the two programs

## **Cross-Pathway Designation: Pennsylvania**

The changes made by OBBBA have brought increased attention onto SNAP's three-month time limit. This provision was originally created in 1996 and is sometimes referred to as the "ABAWD" limit, for "able-bodied adults without dependents," as it originally applied to adults ages 18-49 without a child under 18 in the household and "able to work." Individuals subject to this time limit are limited to three months of SNAP benefits in a 36-month period unless they are working, volunteering or in a qualifying work program for a combination of at least 80 hours per month. OBBBA extended the age range up to 64, added parents and household members of children 14-17, and removed additional exemptions that had been added in 2023. It also severely restricted the availability of waivers of the time limit based on economic circumstances. As a result, over 2 million more individuals are expected to be subject to the SNAP time limit.<sup>12</sup> In addition, because the new Medicaid "community

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<sup>12</sup> Joseph Llobrera, Dottie Rosenbaum, and Caitlin Nchako. *Senate Agriculture Committee's Revised Work Requirement Would Risk Taking Away Food Assistance From More Than 5 Million People: State Estimates.*

engagement requirement” (CER) picks up the SNAP definition of a qualifying work program, the choices made by states here have major implications for Medicaid as well as SNAP.

There are many programs that offer job related training or other services that meet the SNAP definition of qualified work programs, but that have not previously been certified. To maximize residents’ ability to meet the SNAP and Medicaid requirements through education and training, it is important for states to develop a streamlined process for certifying such programs.

A leading example of this is Pennsylvania, which has developed a new process to streamline approval of programs so that they can count toward the SNAP participation requirement. Specifically, the Pennsylvania Department of Human Services (DHS) has built a unified intake that lets a single application produce per-pathway determinations across all three of the SNAP provisions: the student exclusion exemption under §273.5(b)(11), the work registration and time limit exemption for half-time-plus students at "recognized school or training programs" under §273.7(b)(1)(viii), and the “qualifying work program” designation under §273.24(a)(3)(iii).<sup>13</sup> Programs determined to be qualifying work programs under this process will also count toward the Medicaid participation requirement when it comes into effect

This form contains questions that allow the state to determine whether the program meets the requirements of each provision. For example, State or local government administration, funding, or oversight anchors the (b)(11)(iv) prong-1 test and supports (a)(3)(iii) state oversight. Government recognition more broadly — explicitly including listing on the WIOA Eligible Training Provider List, registration with the U.S. Department of Labor or Pennsylvania Department of Labor and Industry as an apprenticeship program, or state licensure — supports (b)(1)(viii) “recognition.” Enrollment of low-income participants, including proxy data such as the share of participants with a Student Aid Index of \$0 or less, as well as questions about whether programs are targeted to former foster youth or students experiencing housing insecurity, test the (b)(11)(iv) requirement that programs are "for low-income households"; programs that fail this question can still qualify under (a)(3)(iii) or (b)(1)(viii). Activity-type questions test the SNAP E&T-equivalent components prong of (b)(11)(iv).<sup>14</sup>

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Center on Budget and Policy Priorities, 2025. <https://www.cbpp.org/research/food-assistance/senate-agriculture-committees-revised-work-requirement-would-risk-taking>.

<sup>13</sup> Pennsylvania Department of Human Services, “SNAP Work Requirements Through Education and Training,” <https://www.pa.gov/agencies/dhs/resources/snap/snap-work-requirements-education-training>, Accessed May 6, 2026.

<sup>14</sup> [2026-03-13-snap-qualifying-program-application-fillable.pdf](#)

Some programs will be able to meet the criteria of multiple pathways, while others will only meet one or two. Pennsylvania has recognized that it may be helpful to approve the same program under more than one pathway. For example, a student who is enrolled at least half time in a program that counts as “a recognized school or training program” under 7 CFR 273.7(b)(1)(viii) is exempt from the time limits, does not need to document the exact hours of participation, and remains exempt during “normal periods of class attendance, vacation and recess.” Therefore, even if the same program could also be considered a “qualifying work program” under 7 CFR 273.24(a)(3)(iii), for a full-time student, it is desirable to count the program under the 273.7 pathway. However, for a student attending less than half time, the 273.7 pathway is unavailable, and the hours spent in the program can only be counted if it is approved under 7 CFR 273.24(a)(3)(iii). Designating the same program under both provisions ensures that students at any level of enrollment are protected.

Putting all these provisions into a single form reduces administrative burden for both training providers and state administrators and increases the likelihood that programs that meet the requirements of multiple pathways will be counted under all of them. Schools and workforce development program operators can complete the form online or download the PDF and return it by email. DHS has stated that it will review the form within 10 business days.<sup>15</sup> This initiative was announced in a press release in mid-March 2026.<sup>16</sup>

Programs benefit from applying for certification because their participants may be more likely to successfully complete the program if they have consistent access to nutrition assistance and health care. Programs can also use the fact that attendance will count toward engagement requirements as part of their marketing and outreach efforts. However, certification does not make programs part of the Pennsylvania SNAP E&T plan or qualify them for SNAP E&T funding.<sup>17</sup>

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<sup>15</sup> <https://www.pa.gov/content/dam/copapwp-pagov/en/dhs/documents/services/assistance/documents/snap/2026-03-13-snap-qualifying-program-application-fillable.pdf>

<sup>16</sup> Pennsylvania Department of Human Services, Shapiro Admin Launches Certification of E&T Programs Help SNAP Recipients, March 13, 2026. <https://www.pa.gov/agencies/dhs/newsroom/shapiro-admin-launches-certification-of-e-t-programs-help-snap-r>

<sup>17</sup> Pennsylvania Department of Human Services, Substack post “New SNAP Work and Education Program Certification Process,” March 26, 2026. <https://pennsylvaniadhs.substack.com/p/new-snap-work-and-education-program>

**SNAP/Medicaid Interaction:**

SNAP qualifying-work-program designations under §273.24(a)(3)(iii) carry over automatically to Medicaid CER Pathway C, because §1902(xx)(9)(D) defines "work program" for Medicaid by direct cross-reference to FNA §6(o)(1). This is incorporated into the Medicaid regulations at §435.552(b).

Medicaid's CTE and GED pathways do not have a direct counterpart on the SNAP side; cross-pathway forms should be designed to capture those determinations as well.

## Recommendations

1

**Develop protections through a multi-agency partnership.**

SNAP and Medicaid agencies are not experts in education and workforce development and have many other demands on their attention in this moment.

The best way to implement these provisions is through partnerships between SNAP and Medicaid agencies, state workforce boards and state higher education authorities and other entities with relevant expertise. Such partnerships will allow states to both identify the full range of programs that residents can use to meet SNAP and Medicaid requirements and ensure that these are meaningful education and training programs that will lead to improved skills and economic outcomes, not just check-the-box exercises. They can also build structures that allow more programs to count as qualifying work programs under an oversight umbrella.

In the future, such partnerships may also be able to add programs to the roster of SNAP E&T providers, allowing for additional drawdown of federal funds to fund both training and supportive services for participants.

2

**Leverage existing classifications to automatically count programs.**

The most efficient path to broad coverage by far is to use existing federal and state classifications and lists (Federal School Code List, Perkins funded programs, federal access programs serving low-income populations, programs on the WIOA eligible training provider list) to automatically populate qualifying-program rosters, rather than requiring each provider to apply individually. The multi-agency partnership will be critical for identifying relevant lists and for understanding the nuances of different lists that make them more or less aligned to specific pathways.

Automatically populating lists reduces the administrative burden of assessing each program and helps reach smaller providers, less-resourced CBOs and other entities that may be less likely to apply for individual certification. Provider-initiated certification should still be available so as not to exclude programs that are not already on a list but should not serve as the starting point for developing a roster. There should also be a process for reviewing education and training programs when a public benefit applicant or recipient is already attending a program that is not on the list to see if that program would qualify.

### **Screen programs against multiple definitions and count all that apply**

3

Given the complexity of the regulatory framework, states should be screening programs against all of the different definitions. These include the three SNAP definitions incorporated into the Pennsylvania form, but also the definition of a CTE program under Perkins and high school/equivalency preparation programs under the Medicaid Pathway D. A given program may qualify under one or more of the provisions, and the provisions have value for different populations (full or part-time student, SNAP or Medicaid applicants).

- §273.5(b)(11)(iv) — SNAP student exclusion exemption. State or local government operated; serves low-income households; one or more components equivalent to acceptable SNAP E&T components.
- §273.24(a)(3)(iii) — SNAP time limit qualifying work program. Designations also satisfy the Medicaid CER “work program” definition for Pathway C. Governor or designee must approve the program.
- §273.7(b)(1)(viii) — SNAP work-registration and time-limit exemption. Half-time enrollment in a “recognized school or training program.” The recognition standard is broad and forgiving; nearly any organized educational or training program meets it.
- §1902(xx)(2)(D) — Medicaid CER educational program. Half-time enrollment in an IHE under HEA §101, or in a CTE program as defined in Perkins Act §3 (20 U.S.C. 2302(5)). The Perkins reference is definitional, not a funding test — a program need not receive Perkins dollars to qualify, only to meet the statutory CTE definition.
- The Medicaid regulations at §435.552(b) also added high school as defined in title VIII of the Elementary and Secondary Education Act and State-approved program of study leading to a certificate of high school equivalence for an applicable individual who has not received a high school diploma.



## 4

### **Build operational infrastructure to support students and eligibility workers.**

Building lists of qualifying programs is not enough to ensure that students are actually able to receive benefits. Caseworkers will need tools that allow them to easily identify students, determine whether they qualify for an exemption, and explain the requirements for continued eligibility. Lists of qualifying programs should be online, easily searchable, and regularly updated.

Specific points where policy and process clarity will be critical in supporting benefits and avoiding errors include:

- how to handle applicants who are only eligible for Medicaid if their SNAP application is processed first (like James, in our second example), and what happens at redetermination;
- the differences between the definition of IHE under the two programs and how to handle cases where someone is enrolled in an IHE for Medicaid purposes but not for SNAP;
- the differences in how work-study earnings are treated under the programs (excluded from SNAP<sup>18</sup> while they are included in the MAGI definition of income used by Medicaid).<sup>19</sup>

These issues should be addressed through joint SNAP/Medicaid guidance, to ensure that the information provided is accurate and consistent across programs, and to signal that the agencies are working together. Benefit agencies should consider designating a caseworker as a student benefit specialist whom other caseworkers can turn to as a resource, and who is also the designated point of contact for college student services offices if students believe that they have been improperly denied.

One of the most challenging elements of student eligibility will be the need to count hours of participation in qualifying work activities and in less than half-time enrollment in educational programs that do not use credit hours. The Medicaid regulations require states to track hours spent “attending class and participating in educational activities.”<sup>20</sup> As much as possible, states should build systems that allow qualifying programs to report participation hours directly to eligibility systems, rather than requiring each student to upload the documents each month to document their hours of participation. A key lesson

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<sup>18</sup> 7 CFR 273.9(c)(3)

<sup>19</sup> 42 CFR 435.603(e)

<sup>20</sup> Medicaid IFC, preamble at <https://www.federalregister.gov/d/2026-11094/p-175> and 42 CFR 435.552(d)(2) at <https://www.federalregister.gov/d/2026-11094/p-1021>

from TANF is that students should never be required to get signatures from their instructors to verify hours of participation, as this is highly burdensome and can be stigmatizing. TANF also provides models for verifying and counting hours spent studying, not just classroom hours.<sup>21</sup>



## **Communicate options clearly and widely**

Even before the OBBBA changes, there was already a lot of confusion and misinformation about college student eligibility for benefits, leading to only a fraction of those likely eligible participating. It will be critical for states to provide plain language explainers both through the benefit agencies and through colleges and other education and training providers that make clear that many students can receive benefits if they meet the other requirements. At colleges, this information should be incorporated into resources provided by financial aid and student support services offices.

States should review both their own benefit screeners and those created by third parties to ensure that they are providing accurate information. Given that screeners are not intended to completely replicate the application experience, this may lead to a lot of “you might be eligible” rather than a more certain answer, but that is preferable to an answer that is confident but wrong. Lists of programs that may qualify, such as those provided by California and Pennsylvania are helpful communications tools.

The implementation of work requirements provides a rare moment when mass media is paying attention to benefit program administration. States should take advantage of this moment to draw attention to the range of options available to meet the requirements.

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<sup>21</sup> Josh Bone, “TANF Education and Training: Pennsylvania KEYS Program” CLASP, April 2010. <https://www.clasp.org/sites/default/files/public/resources-and-publications/files/KEYS.pdf> and Josh Bone “TANF Education and Training: Kentucky’s Ready to Work Program,” CLASP, January 2010. <https://www.clasp.org/sites/default/files/public/resources-and-publications/files/RTW.pdf>

## Appendix: SNAP and Medicaid Work Requirements for Students

Table 1: SNAP

| Provision                                                                                                      | Applies to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | What programs or exemptions qualify                                                                                                                                                                                                                                                                                                                                                                       | State action?                                                                                                                                                                                                                                                       | Effect                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Student Exclusion: Scope</b><br>FNA §6(e) / 7 CFR 273.5(a)<br><br>Is this student subject to the exclusion? | Students who meet the <b>three-part test</b> at §273.5(a), as named in the FNS Feb. 2023 memo:<br><b>1. Enrollment status:</b> enrolled at least half-time, as determined by the institution <sup>1</sup> ;<br><b>2. Type of school:</b> a business, technical, trade, or vocational school, OR a college or university that offers degree programs;<br><b>3. Type of curriculum:</b> for vocational schools, a curriculum that normally requires a high school diploma; for colleges, a “regular curriculum.” | FNS has identified remedial education, continuing or community education, professional development, ESL, and workforce development/training programs as commonly outside a college’s regular curriculum. Students in those programs are not IHE students under the three-part test, even at a degree-granting institution.<br><br>See the next row for exemptions when the three-part test <b>is</b> met. | No formal designation is required by regulation, but FNS Feb. 2023 memo encourages states to set statewide screening standards on which schools and curriculums fall within the IHE three-part test, rather than rely on case-by-case eligibility-worker decisions. | If all three elements of the test are met, the student is ineligible for SNAP unless an exemption in the next row applies. If <i>any</i> element is not met — most commonly the regular-curriculum element — the student is not an IHE student for SNAP purposes and is eligible under regular SNAP rules. |

<sup>1</sup> See 2023 FNS memo on IHE and Student Eligibility Rules.

| Provision                                                                                                                              | Applies to                                               | What programs or exemptions qualify                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | State action?                                                                                                                                                                                                                                                                                                          | Effect                                        |
|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| <b>Student Exclusion: Exemptions</b><br>FNA §6(e) / 7 CFR 273.5(b)<br><br>How can a student covered by the exclusion qualify for SNAP? | IHE students otherwise subject to the student exclusion. | <b>Exemptions based on participation in a designated program<sup>2</sup>:</b> <ul style="list-style-type: none"> <li>• JOBS / TANF E&amp;T or successor program (§273.5(b)(4))</li> <li>• State or federally financed work-study (§273.5(b)(6)).</li> <li>• On-the-job training program (§273.5(b)(7)).</li> </ul> <b>§273.5(b)(11) program assignments</b> <ul style="list-style-type: none"> <li>• JTPA/ WIOA Title I (§273.5(b)(11)(i))</li> <li>• Perkins CTE (§273.5(b)(11)(ii)(A)) or remedial/ABE/literacy/ESL (§273.5(b)(11)(ii)(B)) coursework — both require operation as a SNAP E&amp;T program under §273.7(e).</li> <li>• Trade adjustment assistance at Trade Act §236 (§273.5(b)(11)(iii)) — largely terminated as of July 2022.</li> <li>• State or local employment and training program for low-income households with components determined equivalent to SNAP E&amp;T components (§273.5(b)(11)(iv))</li> </ul> | (b)(4), (b)(6), (b)(7), and (b)(11)(i) and (iii) require no SNAP-specific state designation.<br><br>(b)(11)(ii)(A) and (ii)(B) require the program to be in the state's §273.7 SNAP E&T plan.<br><br>(b)(11)(iv) requires the state agency to determine that program components are equivalent to SNAP E&T components. | Student is exempt from the student exclusion. |

<sup>2</sup> 7 CFR 273.5(b) also exempts students based on personal status rather than program participation: age 17 or younger or 50 or older (b)(1); physically or mentally unfit (b)(2); receiving TANF cash assistance (b)(3); employed for at least 20 hours/week or self-employed at the equivalent (b)(5); responsible for the care of a dependent under age 6 (b)(8); responsible for the care of a dependent age 6–11 when adequate child care is unavailable (b)(9); and single parent of a child under 12 enrolled full-time (b)(10).

| Provision                                                                                                                                                                                          | Applies to                                                                                                                                                                                            | What programs or exemptions qualify                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | State action?                                                                              | Effect                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Work Registration and Time Limit Exemption</b><br>FNA §6(d)(2) / 7 CFR 273.7(b)(1)(viii)<br><br>Is this student exempt from the time limit?                                                     | Students enrolled at least half-time in any “recognized school or training program” — a broader category than the IHE definition above, including programs that do not require a high school diploma. | Any recognized school or training program. “Recognized” is undefined in the regulation and interpreted broadly. Exemption continues through normal school breaks.                                                                                                                                                                                                                                                                                                                                            | No formal certification required; “recognized” is a broad standard which states interpret. | Time limit clock stops for duration of enrollment, including breaks. Work registration waived. No monthly hour tracking required. More protective than 273.24 compliance for students who can reach it.        |
| <b>Time Limit Compliance Through Qualifying Programs</b><br>FNA §6(o) / 7 CFR 273.24<br><br>Can a student subject to the time limit satisfy the requirement in part through program participation? | SNAP recipients who are subject to the time limit.                                                                                                                                                    | Qualifying work programs - §273.24(a)(3):<br>(i) WIOA Title I programs; <sup>3</sup><br>(ii) Trade adjustment assistance (TAA);<br>(iii) Programs operated or supervised by a state or local agency meeting Governor-approved standards (including SNAP E&T components in the state E&T plan, but with limitations on job search);<br>(iv) DOL/VA veteran employment programs;<br>(v) Workforce partnerships at §273.7(n).<br>Note: WIOA Title II programs do not qualify unless separately state-certified. | Chief Executive Office (Governor) or designee must approve qualifying programs.            | Qualifying program hours, combined with paid or unpaid work, count toward the 80-hour/month requirement. Must be satisfied each month to avoid accumulating a “countable month”—extra hours do not carry over. |

<sup>3</sup> Per 2016 FNS guidance, hours spent as a “reportable individual” or “participant” under 20 CFR §677.150 can count. This means that time spent in intake, assessment, and job search can count.

## **SNAP Employment and Training (E&T)**

SNAP Employment and Training (E&T), at 7 CFR §273.7(e), is a state-administered program providing employment and training services to SNAP recipients. SNAP E&T components can include: supervised job search, job search training, workfare, work experience, supported work, educational programs or activities to improve basic skills, build work readiness, or otherwise improve employability, self-employment services, and job retention.

On top of a limited pool of 100% federal funds, states can claim 50 percent federal reimbursement for allowable non-federal expenditures on SNAP E&T activities. Under longstanding policy, this includes “third-party claiming,” in which the education or training provider — rather than the state SNAP agency — supplies the non-federal funds.

While the availability of federal reimbursement funds is highly appealing, including a program in a state’s SNAP E&T plan triggers a number of operational requirements, including that:

- Participants must be screened by the SNAP agency to determine whether the E&T placement is appropriate;
- Programs may only claim expenditures for services provided to participants in months when they are receiving SNAP;
- The SNAP agency must provide case management, as well as reimbursement for participant costs that are necessary and directly related to participation, including transportation and child care;
- Programs must collect and report specified outcome data.

Because of these requirements, many states do not incorporate every education or training service received by SNAP recipients into their SNAP E&T programs. It is therefore worth highlighting the option under §273.5(b)(11)(iv) — to provide an exemption from the student exclusion for students in state or local employment and training programs for low-income households whose components the state agency determines to be equivalent to acceptable SNAP E&T components. The program is not itself a SNAP E&T program; it operates separately.

For ABAWD compliance (§273.24), the controlling state action is Chief Executive Office (Governor) approval under §273.24(a)(3)(iii). SNAP E&T programs are automatically considered qualifying work programs, except that there is a limitation on counting job search: supervised job search and job search training programs may only be counted when a subsidiary activity (less than half the total time) of another E&T component. This restriction carries over to other approved programs under §273.24(a)(3)(iii) but not to the WIOA, TAA, veterans’ employment programs, or workforce partnerships.

## Table 2: Medicaid Community Engagement Requirement — Education and Training Pathways

The Medicaid CER provides two routes for students and trainees: the SNAP carve-out (which depends on SNAP status) and direct qualifying activities. Pathways A (paid work), B (community service), and G (seasonal income average) are not shown.

*The CMS implementing rule for the Medicaid community engagement requirement was published as an Interim Final Rule with Comment Period (IFC) on June 3, 2026, with comments due July 31. There may be future changes based on comments received.*

| Pathway                                                                                                                   | What counts                                                                                                                                                                                                                                                              | Key takeaways                                                                                                                                                                                                                                                                                                                          | IFC Provisions                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SNAP Carve-Out</b><br>SSA §1902(xx)(9)(A)(ii)(VI)(bb).<br>42 CFR §435.554(c)(7):                                       | Being in a SNAP household and <i>subject to</i> (not exempt from) a SNAP work requirement.                                                                                                                                                                               | Students who are <i>exempt</i> from SNAP work requirements do not benefit from this carve-out — their SNAP exemption removes the condition that triggers it.                                                                                                                                                                           | Preamble makes clear that if someone is in SNAP household and is subject to either the general work requirement (work registration) or the time limit, or both, they are exempt from the Medicaid requirement. They are still exempt even if they are non-compliant (accruing countable months) for SNAP.                                                                                                                                                               |
| <b>Pathway C: Work Program</b><br>§1902(xx)(2)(C);<br>work program defined at §1902(xx)(9)(D)<br>§435.552(b)              | 80 hours/month in a qualifying work program.                                                                                                                                                                                                                             | Imports FNA §6(o)(1) definition — same programs certified under SNAP 273.24 qualify.<br>Note: SNAP E&T is limited to current SNAP recipients; Medicaid-only participants need a CEO-approved program open to non-SNAP participants.                                                                                                    | Incorporates the SNAP definition, including the provision that supervised job search or job search training can count as a subsidiary activity.                                                                                                                                                                                                                                                                                                                         |
| <b>Pathway D: Enrollment</b><br>§1902(xx)(2)(D);<br>educational program defined at §1902(xx)(9)(B)<br>§435.552(b) and (c) | Half-time enrollment in an IHE under HEA §101 (public and nonprofit institutions only) or in a CTE program (as defined under Perkins). Regulations add high school attendance and a state-approved program of study leading to a certificate of high school equivalence. | Broader than SNAP in some ways (CTE explicitly named, high school and GED programs added by regulation); narrower in others (for-profit schools excluded under HEA §101 even if they qualify under SNAP’s IHE definition).<br><br>Programs that are “outside the regular curriculum” for SNAP purposes may still be IHEs for Medicaid. | Adds HS attendance and state-approved equivalency programs, but not independent study or self-paced online preparation. Programs that are not in person must monitor and document program hours.<br>CMS follows FNS and ED policy of allowing schools to make half-time determination. For college enrollment, full or part-time status is reported to National Student Clearinghouse. CMS adopts the FNS policy of considering students enrolled during school breaks. |
| <b>Pathway E: Combining</b><br>§1902(xx)(2)(E)<br>§435.552(d) and (e)                                                     | Any combination of qualifying activities (A)–(D) totaling 80 hours/month.                                                                                                                                                                                                | In addition to work programs under C, allows below-half-time IHE or CTE participation to count toward 80 hours when combined with paid work or community service, even if the student does not meet the half-time threshold for Pathway D alone.                                                                                       | For programs that use credit hours, each credit can be multiplied by 3 hours per week and 4.33 weeks per month, following the Carnegie Unit standard. For programs that do not use credit hours, hours spent attending class and participating in educational activities count.                                                                                                                                                                                         |

| Pathway                                     | What counts                                                  | Key takeaways                                         | IFC Provisions                                                                                                                                                                                                                |
|---------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Pathway F: Income</b><br>§1902(xx)(2)(F) | Monthly income ≥ \$580<br>(federal minimum wage × 80 hours). | Work-study income is generally considered under MAGI. | Regulations confirm that MAGI definition is used. §435.603<br>If income is under \$580/month and the state does not have documentation on hours worked, can divide monthly income by federal minimum wage to determine hours. |

Table 3: Program-by-Program Guide

| Program Type                                                                                       | SNAP -- Student exclusion (§6(e) / 273.5)<br>Time limit exemption (§6(d)(2) / 273.7)<br>Time limit compliance (§6(o) / 273.24)                                                                                                                                                                                                                                                                                                                                     | Medicaid CER -- Direct Qualifying Pathways -- §1902(xx)(2)<br>42 CFR 435.550-435.563                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Public or nonprofit college</b><br>Degree or credential program<br>Enrolled at least half-time  | <b>Student exclusion:</b> See Table 1 for discussion of SNAP definition of IHE. Student is subject to the exclusion and ineligible for SNAP unless an exemption applies. Personal exemptions include working 20+ hrs/week, parent of young child, age, and disability. Enrollment through certain E&T programs creates exemptions<br><b>Time limit exemption:</b> Exempt from work registration and time limit while enrolled half-time +. No state action needed. | <b>Pathway D (enrollment):</b> Qualifies directly -- half-time+ enrollment at an IHE under HEA §101. No state action needed. Hours do not need to be reported separately from enrollment status.<br>Medicaid has no analog to the SNAP student exclusion. Enrollment counts toward Medicaid CER without any state certification, regardless of major or program of study.                                                                                                                                                    |
| <b>Public or nonprofit college</b><br>Degree or credential program<br>Enrolled less than half-time | <b>Student exclusion:</b> Below the half-time threshold -- NOT subject to the exclusion. Eligible for SNAP on regular rules.<br><b>Time limit exemption:</b> NOT exempt -- below the half-time threshold.<br><b>Time limit compliance:</b> Course hours count toward the 80-hour/month requirement ONLY if the program has been state CEO-certified as a qualifying work program.                                                                                  | <b>Pathway D (enrollment):</b> Below half-time -- does not qualify on its own.<br><b>Pathway E (combining):</b> Time spent in education can combine with work or community service to reach 80 hrs/month, even below the half-time threshold. No state approval of program is required.                                                                                                                                                                                                                                      |
| <b>For-profit college</b><br>Non-CTE degree or credential program<br>Enrolled at least half-time   | <b>Student exclusion:</b> A for-profit school may be considered an IHE under SNAP if it is a degree-granting institution or a vocational/trade school normally requiring a HS diploma. If it qualifies and the student is enrolled half-time+, the student exclusion applies and an exemption is needed to be eligible.<br><b>Time limit exemption:</b> Exempt from work registration and time limit while enrolled half-time +. No state action needed.           | <b>Pathway D (enrollment): DOES NOT QUALIFY.</b> HEA §101 covers only public and nonprofit institutions. For-profit schools appear to be excluded even if they qualify under the SNAP definition of IHE.<br><b>Pathway C (work program):</b> May qualify if state certifies the program as a CEO-approved qualifying work program.<br><b>Pathway E (combining):</b> Hours can combine with work or community service toward the 80-hour total only if state certifies the program as a CEO-approved qualifying work program. |

|                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <b>For-profit college</b><br>Non-CTE degree or credential program<br>Enrolled less than half-time                                                             | <b>Student exclusion:</b> Below the half-time threshold -- NOT subject to the exclusion. Eligible for SNAP on regular rules.<br><b>Time limit exemption:</b> NOT exempt -- below the half-time threshold.<br><b>Time limit compliance:</b> Course hours count toward the 80-hour/month requirement ONLY if the program has been state CEO-certified as a qualifying work program.                                                                                                                                                                                            | <b>Pathway D (enrollment):</b> Below half-time -- does not qualify on its own.<br><b>Pathway C (work program):</b> May qualify if state certifies the program as a CEO-approved qualifying work program.<br><b>Pathway E (combining):</b> Hours can combine with work or community service toward the 80-hour total only if state certifies the program as a CEO-approved qualifying work program.                                                 |
| <b>Community college CTE or workforce program</b><br>Perkins-funded or CTE-designated<br>NOT in the regular college curriculum<br>Enrolled at least half-time | <b>Student exclusion:</b> FNS guidance (Dec. 2024, Q18) confirms that Perkins CTE programs are typically outside the SNAP IHE definition of regular curriculum. Students are generally not subject to the student exclusion and are eligible for SNAP on regular rules.<br><b>Time limit exemption:</b> Exempt from time limit while enrolled half-time+ at a recognized program. No state action needed.<br><i>State determination of E&amp;T equivalence under §273.5(b)(11)(iv) provides an additional explicit student exclusion exemption -- but may not be needed.</i> | <b>Pathway D (enrollment):</b> Qualifies directly as a Perkins CTE program -- no state action needed. Hours do not need to be reported separately from enrollment status.                                                                                                                                                                                                                                                                          |
| <b>Community college CTE or workforce program</b><br>Perkins-funded or CTE-designated<br>Enrolled less than half-time                                         | <b>Student exclusion:</b> Not applicable -- below half-time threshold and typically outside regular curriculum.<br><b>Time limit exemption:</b> NOT exempt -- below half-time threshold.<br><b>Time limit compliance:</b> Hours count toward the 80-hour/month requirement only if the state has certified the program as a qualifying work program.                                                                                                                                                                                                                         | <b>Pathway D (enrollment):</b> Below half-time -- does not qualify alone.<br><b>Pathway E (combining):</b> CTE hours can combine with work or community service to reach 80 hours/month. No state certification required.                                                                                                                                                                                                                          |
| <b>WIOA Title I program</b><br>Adult, Dislocated Worker, or Youth                                                                                             | <b>Student exclusion:</b> Exempt -- WIOA Title I is listed as a qualifying E&T program at §273.5(b)(11)(i). <sup>4</sup><br><b>Time limit exemption:</b> Exempt from time limit if enrolled half-time+ at a recognized program<br><b>Time limit compliance:</b> Qualifies -- WIOA Title I is listed at 273.24(a)(3)(i). Per 2016 FNS guidance, hours spent as a “reportable individual” or “participant” can count. No restriction on job search.                                                                                                                            | <b>Pathway D (enrollment):</b> Some WIOA programs may meet the definition of CTE under Perkins; in that case half-time+ enrollment would meet the requirement.<br><b>Pathway C (work program):</b> Qualifies -- Medicaid imports the 273.24 work program definition, which includes WIOA Title I.<br><b>Pathway E (combining):</b> WIOA hours can combine with work or community service to reach 80 hours/month. No state certification required. |

<sup>4</sup> Regulatory language still refers to programs under the Job Training Partnership Act, but is understood to include its successor program, which is the Workforce Innovation and Opportunity Act (WIOA). See October 2016 FNS memo,

|                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>High School attendance or preparation for HS equivalency exam.</b>                                                                     | <b>Student exclusion:</b> Not applicable.<br><b>Time limit exemption:</b> Exempt from time limit while enrolled half-time+ at a recognized program.<br><b>Time limit compliance:</b> Less than half time enrollment will generally not count.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Pathway D (enrollment):</b> Generally counts, although equivalency prep programs must be state-approved— independent study and self-paced programs not countable.<br><b>Pathway E (combining):</b> Hours can combine with work or community service to reach 80 hours/month.                                                                                                                                                                                                                                                                                                                       |
| <b>WIOA Title II program</b><br>(Adult Education and Family Literacy Act)<br><br>(other than GED) adult basic education, ESL, or literacy | <b>Student exclusion:</b> Generally does not apply. In most cases, ABE, ESL and literacy services are not considered part of the “regular curriculum” even if offered at an IHE.<br><b>Time limit exemption:</b> May qualify if enrolled half-time+ and the program is considered a “recognized school or training program.”<br><b>Time limit compliance:</b> WIOA Title II is NOT listed. Hours do NOT count unless the state separately certifies the program as a CEO-approved qualifying work program.                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Pathway D (enrollment):</b> Non-GED adult education, ESL and literacy generally do not count. Programs at IHEs and integrated education and training programs will need to be considered on an individualized basis.<br><b>Pathway C (work program):</b> Does not qualify by itself -- not listed in 273.24. Requires state CEO certification.<br><b>Pathway E (combining):</b> Hours may combine work or community service only if countable under C or D.                                                                                                                                        |
| <b>SNAP Employment and Training (E&amp;T) Program</b><br>Included in the state's SNAP E&T plan under 7 CFR 273.7(e)                       | <b>Student exclusion:</b> Generally does not apply, as E&T services are unlikely to meet the three-part IHE test. However, plan inclusion alone does not automatically exempt enrolled students. Exemption under §273.5(b)(11)(ii) requires state-agency determination that coursework is (A) Perkins CTE or (B) remedial / ABE / literacy / ESL.<br><b>Time limit exemption:</b> Some E&T programs may qualify as a "recognized school or training program" for the half-time+ exemption, but the E&T recognition does not confer any additional benefit.<br><b>Time limit compliance:</b> Automatic — SNAP E&T plan inclusion serves as the §273.24(a)(3)(iii) state action; no separate certification is needed. Limit: Stand-alone supervised job search and job search training programs under E&T do not count as qualifying hours. Subsidiary job search activities (less than half the time of another component) do count. | <b>Pathway D (enrollment):</b> Only if the program is considered enrollment at an IHE under HEA §101 or is a Perkins CTE program; in that case half-time+ enrollment would meet the requirement.<br><b>Pathway C (work program):</b> Qualifies via the §273.24 import. SNAP E&T is limited to SNAP recipients, so Medicaid-only participants need a different qualifying program (or for the program to serve other individuals with non E&T funds).<br><b>Pathway E (combining):</b> Hours can combine with work or community service to reach 80/month. No additional state certification required. |
| <b>State CEO-approved qualifying work program</b><br>Certified by the state under 273.24(a)(3)(iii)                                       | <b>Student exclusion:</b> May exempt from student exclusion if additionally certified as an employment and training program for low-income households under 273.5(b)(11)(iv).<br><b>Time limit exemption:</b> Exempt if enrolled half-time+ at a recognized program.<br><b>Time limit compliance:</b> Qualifies under 273.24(a)(3)(iii). Hours combined with work count toward the 80-hour/month requirement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Pathway C (work program):</b> Qualifies directly -- Medicaid imports the 273.24 work program definition. Therefore, certification under SNAP 273.24 creates simultaneous qualification for Medicaid Pathway C.<br><b>Pathway E (combining):</b> Yes, once certified.                                                                                                                                                                                                                                                                                                                               |

|                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Private or uncertified training program</b><br>Not affiliated with an IHE, WIOA, or Perkins<br>Not state-certified as a qualifying program | <b>Student exclusion:</b> Not applicable unless the program is offered by a qualifying IHE.<br><b>Time limit exemption:</b> May qualify if the program is recognized -- but that term is undefined and requires state interpretation. Not automatic.<br><b>Time limit compliance:</b> Hours do not count without state CEO certification. | <b>Pathway D (enrollment):</b> Does not qualify unless it counts under the CTE definition.<br><b>Pathway C (work program):</b> Does not qualify without state CEO certification.<br><b>Pathway E (combining):</b> Not unless it counts under C or D. |
|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

*Note on the SNAP carve-out: A person who is a member of a SNAP household and not exempt from a SNAP work requirement is automatically exempt from Medicaid CER under the SNAP carve-out at §1902(xx)(9)(A)(ii)(VI)(bb). The Medicaid column reflects the direct pathways available when the SNAP carve-out does not apply.*

## Key Differences Between the SNAP and Medicaid Definitions

**For-profit schools:** SNAP definition of IHE can include for-profit vocational and trade schools that normally require a high school diploma. Medicaid Pathway D is limited to institutions under HEA §101, which covers only public and nonprofit institutions. For-profit students who may qualify for SNAP exemptions have no direct enrollment pathway under Medicaid Pathway D, unless CMS broadens the application through regulations.

**Perkins CTE at community colleges:** The Perkins Act §3 definition ([20 U.S.C. 2302\(5\)](#)) defines career and technical education as "organized educational activities that ... offer a sequence of courses that ... provides individuals with rigorous academic content and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions ... [and] provides technical skill proficiency or a recognized postsecondary credential, which may include an industry-recognized credential, a certificate, or an associate degree." The definition is content-based—a program can meet it without receiving any Perkins dollars.

FNS has acknowledged that Perkins CTE programs at community colleges are often outside the regular curriculum -- meaning students may not be subject to the student exclusion and thus be eligible for SNAP on regular rules (FNS Dec. 2024 guidance, Q18). Under Medicaid, Perkins CTE programs are explicitly named as qualifying programs for Pathway D. The outcomes are favorable under both programs, though through different legal mechanisms.

**Basic education, ESL, literacy at community colleges:** FNS has stated that such programs at community colleges are often outside the regular curriculum -- meaning students may not be subject to the student exclusion and thus be eligible for SNAP on regular rules (FNS Feb. 2023 guidance). However, for Medicaid purposes, a finding that students in such programs are not in an IHE may prevent them from qualifying under Pathway D unless they count as HS/HS equivalency. (Basic education that is part of an integrated training and education program may qualify under the CTE leg of Pathway D.)

**Below-half-time enrollment:** Under SNAP, below-half-time students must rely on state-certified qualifying work programs (273.24) for time limit compliance -- their course hours do not count otherwise. Under Medicaid, below-half-time IHE, Perkins CTE, and high school hours can count under Pathway E (combining) without any state certification. High school equivalency programs must be "state-approved." How hours are tracked depends on whether school uses credit hours (can claim 3 hours per week based on Carnegie Units) or not (hours of participation in training activities must be counted).

## Citations

### SNAP

- Food and Nutrition Act of 2008, §6(d) (work registration), §6(e) (student exclusion), §6(o) (ABAWD time limit), codified at [7 U.S.C. §2015](#).
- [7 CFR 273.5](#) (student eligibility)
- [7 CFR 273.7](#) (work registration, including (b)(1)(viii) half-time student exemption; (e) SNAP E&T)
- [7 CFR 273.24](#) (time limits and qualifying work program definition)
- FNS, “[SNAP – Institutions of Higher Education and Student Eligibility Rules](#),” memorandum to all SNAP State Agencies, February 7, 2023.
- FNS, “[SNAP – Questions and Answers on Student Exemptions](#),” memorandum to all SNAP State Agencies, December 20, 2024.
- FNS, “[Clarifying Obsolete Regulatory References to Employment, Training, and Service Programs](#),” October 17, 2016.

### Medicaid

- [OBBBA](#), §71119
- Social Security Act, [§1902\(xx\)](#)
- CMCS Informational Bulletin, “[Section 71119 of the “Working Families Tax Cut” Legislation, Public Law 11921: Requirements for States to Establish Medicaid Community Engagement Requirements for Certain Individuals](#),” December 8, 2025.
- Interim Final Rule with Opportunity to Comment, Medicaid Program, [Community Engagement Requirement for Certain Individuals](#), FR Doc. 2026-11094; published June 3, 2026 at 91 Federal Register 33348.
- 42 CFR 435.550-435.563 (eCFR will not go live until effective date of July 31, 2026).

### Other key legislation

- Carl D. Perkins Career and Technical Education Act of 2006, §3— codified at [20 U.S.C. §2302](#).
- Higher Education Act of 1965, §101 (public/nonprofit IHE definition) – codified at [20 USC §1001](#)
- HEA §102 (proprietary institutions) – codified at [20 USC §1002](#)
- Workforce Innovation and Opportunity Act, Title I -- codified at [29 U.S.C. §§3151 et seq.](#)