

Department of Social and Health Services  
Olympia, Washington  
**EAZ Manual**

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**Summary**

Updated Student Eligibility to include exemptions for those eligible for work study and expected family contribution of \$0 during the COVID19 pandemic.  
See below for edited text:



## Student Status

Revised ~~July 29, 2019~~ January 15, 2021

### 1. Purpose:

This section explains who is considered a student for the Washington Basic Food Program, which students are eligible for Basic Food, and when a client's student status begins and ends.

[WAC 388-482-0005](#) How does being a student of higher education affect my eligibility for the Washington Basic Food Program?

- [Clarifying Information](#) and [Worker Responsibilities](#)



**Starting January 16, 2021, Basic Food has been temporarily expanded to the following two populations in response to the COVID-19 public health emergency as allowed in the Consolidated Appropriations Act of 2021:**

- **Students determined eligible to participate in state or federal work study by the institution of higher education; or**
- **Students with an expected family contribution (EFC) of \$0 in the current academic year.**

**These expansions will continue until 30 days after the federal COVID-19 public health emergency is lifted.**

**NOTE:**

For more information and guidance, see [Student Eligibility Desk Aid](#).

~~**NOTE:** If a client is determined to be an ineligible student during the Basic Food interview, the application should be denied. Do not pend the application to allow the client time to meet student eligibility. If the client wants to qualify for Basic Food through meeting student eligibility, the client must reapply after their circumstance changes.~~

Clarifying Information - [WAC 388-482-0005](#)

1. *General Rule:*

An adult who is enrolled and taking at least six credits (half time) in an institution of higher education is ineligible to receive Basic Food unless they meet one of the exemptions described in this section.

2. *Institutions of Higher Education Including Online Schools:*

An individual is considered enrolled in an institution of higher education if the individual is enrolled in a business, technical, trade, or vocational school that normally requires a high school diploma or equivalency certificate for enrollment in the curriculum or if the individual is enrolled in a regular curriculum at a college or university that offers degree programs regardless of whether a high school diploma is required. Institutions of higher education can also include online schools (for example: University of Phoenix) and correspondence schools as long as the entry criteria or degree program characteristics are met and the student is considered attending at least half time.

Colleges or universities normally require diplomas or certificates but allow exceptions for some students who are not high school graduates to enroll in classes. These institutions are still considered institutions of higher education.

**NOTE:**

~~If a client is determined to be an ineligible student during the Basic Food interview, the~~

~~application should be denied. Do not pend the application to allow the client time to meet student eligibility. If the client wants to qualify for Basic Food through meeting student eligibility, the client must reapply after their circumstance changes.~~

If a client is determined to be an ineligible student as they meet no exemptions during the Basic Food interview, the application should be denied. Do not pend the application to allow the client time to begin meeting an exemption. If the client wants to qualify for Basic Food through meeting student eligibility, the client must reapply after their circumstance changes.

Example: Patrick is a student of higher education and applies for Basic Food. During the interview, he discloses he has a job interview, but hasn't been hired. Patrick meets no other exemptions. Do not pend his application for the results of the job interview. He can reapply once he is meeting the 20 hours a week average if he is hired or if he meets another exemption.

**NOTE:**

All Washington State public universities, technical, and community colleges consider 6 credits to be half time. If someone is attending a private college or university, half time status must be verified with the school.

3. *Courses not considered higher education:*

A student is not considered enrolled in an institution of higher education if the student attends only for the purpose of participating in one of the following programs:

1. English as a second language (ESL);
2. High school completion and GED courses including Running Start;
3. Courses that are not a part of the regular college program; or
4. A WIA program contracted by a college.

**EXAMPLE:**

Kurt attends a technical college that offers both a two-year degree program and a one-year certificate program. The degree program requires a high school diploma or GED for enrollment, while the certificate program has no such requirements. Kurt is enrolled in the one-year certificate program curriculum. Since the certificate-only program that he is enrolled in does not require a diploma or GED, Kurt is not considered to be enrolled in an institution of higher education. Therefore, Kurt does not have to meet student eligibility requirements for Basic Food.

4. *When Student Status Ends:*

Student status ends when the student:

- a. Graduates;
  - b. Is suspended or expelled;
  - c. Drops out of school; or
  - d. Does not intend to register for the next normal school term (excluding summer school).

5. *Employed Students:*

Employed students meet the eligibility criteria when they work at least 80 hours each month **or** average 20 hours per week. It is not necessary that they work 20 hours each week.

6. *Self Employed Students:*

Self-employed students meet the eligibility criteria when:

- 0. They work an average of twenty hours each week; and
  - 1. Earn an amount at least equal to the federal minimum wage for twenty hours a week. The current federal minimum wage can be found at <https://www.dol.gov/whd/index.htm>.

7. *Care for a dependent person in the AU:*

In order for a client to be an eligible student based on their need to provide care for a dependent member of the AU, the client must be responsible for more than half of the care.

Because of this, one child cannot make more than one student eligible for Basic Food. See Worker Responsibilities below for recommended interview questions and documentation requirements for allowing student eligibility based on dependent care responsibilities when both parents live in the household.

8. *Income-in-kind:*

Income-in-kind is not considered payment for work and cannot be used to establish hours of workweek.

**EXAMPLE**

Melanie works for the college during her summer break. Instead of paying her wages, the school deducts the income from her fall tuition costs. We cannot use the value of the work or the hours worked when we determine if she is an eligible student.

9. *Work Study:*

Starting January 16, 2021, a student determined “eligible to participate” or participating in state or federal work study will be considered an eligible student for basic food.

This is effective until 30 days after the federal COVID-19 public health emergency ends for new applications. For work study to make someone an eligible student, the student must be both:

~~Approved for work study as part of a financial aid package for the school term; and~~

~~Anticipate participating in a work study job during that time.~~

~~If a work study job is not available or has not begun, the student is still eligible for the exemption until they notify us they refused a work study job. See Worker Responsibilities below for recommended documentation of "anticipating work study."~~

#### 10. Expected family contribution (EFC) of \$0

Starting January 16, 2021, a student with an EFC of \$0 is an eligible student for basic food.

This is effective until 30 days after the federal COVID-19 public health emergency ends for new applications.

Worker Responsibilities - [WAC 388-482-0005](#)

#### 1. *Determine if the person attending school is a 'student' for purposes of Basic Food:*

If a client attends school, determine if the client meets the definition of "student" for Basic Food before looking at whether or not that client is an eligible student. We don't consider someone to be a student if they are:

- Under 18;
- 50 or over;
- Are physically or mentally unable to work; or
- In a program that does not require a GED or Diploma and does not offer a degree.

#### **NOTE:**

If a client claims to be physically or mentally unable to work and the client's statement is questionable, verify the claim by:

5. Proof of permanent disability benefits issued by a public or private source; or
  6. A statement from a qualified professional or their staff.

#### 2. *Evaluate a student's eligibility for Basic Food:*

0. If you decide that a client meets the definition of a student, review the circumstances to decide if the person is an eligible student for Basic Food.

1. Dependent care – When both parents are in the home:

Before allowing student eligibility based on dependent care responsibilities when both parents live in the household, determine why the other parent cannot care for the child in place of the student parent. Ask the following questions during the interview:

1. Is the non-student parent employed?
2. If not employed or not working full time, why can't this parent care for the child in the absence of the student parent?
3. Is the non-student parent disabled and not able to provide adequate care for the child?

**NOTE:**

All responses to these questions must be documented in the case and/or the worker must thoroughly document why it was decided to allow or not allow student eligibility based on dependent care responsibilities

**EXAMPLE:**

A student and her spouse have a 4 year old child. The non-student parent is not employed but is actively looking for work. The student parent cares for the child about 60% of the time. In this case the worker documents that since the non-student parent is actively looking for work by filing job applications and attending interviews the student parent needs to care for the child more than half the time to allow for the other parent's job search activities. The student is eligible for Basic Food.

**3. Determining Student Income**

Student income must be evaluated and verified for all students, even if the student does not have to meet student eligibility criteria.

**EXAMPLE:**

Mark is a student at Western Washington University, attending half-time. He is 53 years old and does not have to meet student eligibility requirements. You must determine if he receives any countable or exempt student income.

○ **Unearned:**

Payments for the educational assistance of an AU member enrolled at a recognized institution of post-secondary education, school for the handicapped, vocational program or a program that provides for completion of a secondary school diploma or GED.

○ **Earned:**

Work study program wages are earnings from a program operated by a post-secondary school in which the student works and earns money during the year. Federally funded work study is non-countable income, whereas state-funded work study is countable income.

○ **Income-in-kind:**

Income-in-kind is not considered payment for work and cannot be used to establish hours of work week.

○ **Educational income:**

All educational income excluded under [WAC 388-450-0035](#) is excluded and not counted in the eligibility or benefit determination. **This includes, but is not limited to:**

- Basic Educational Opportunity Grant (BEOG)
- Pell Grant
- Federal Supplement Education Opportunity Grant (FSEOG)
- State Student Incentive Grant (SSIG)
- Federal Direct Student Loan Program (FDSLPL)
- Guaranteed Student Loans (GSL)
- Federal Family Education Loan Program (FFELP), includes Federal Direct Stafford Loan, Unsubsidized Stafford Loan, Consolidated Loan, PLUS Program
- Federal Airlines Loan Program
- Bureau of Indian Affairs Adult Education, Higher Education, GED, Job Training and Technical School Programs
- Federal Work Study Programs
- TRIO Grants such as Upward Bound, Robert E. McNair Post-Baccalaureate Achievement, Student Support Services
- Robert C. Byrd Honors Scholarship
- College Assistance Migrant Program (CAMP)
- High School Equivalency Program (HEP)
- National Early Intervention Scholarship and Partnership Program
- HOPE Scholarship
- Educational assistance received through the Montgomery GI Bill

**NOTE:**

Some of the educational assistance sources named above (except funding from Title IV –HEA and BIA education assistance) will have funds not used for attendance costs that must be counted as unearned income. Make sure you refer back to [WAC 388-450-0035](#) for specific rules about when you can exclude the entire educational assistance amount.

- **Veteran's Administration Educational Assistance (including Montgomery GI Bill):**

Subtract all attendance costs allowed in sub-sections (2) (a) and (b) of [WAC 388-450-0035](#) from the student's educational assistance. Budget the amount left as unearned income to the AU. Average this income over the period of time the VA states the assistance covers.

**NOTE:**

Exclusions apply only to monies from an educational source and not to educational payments made from income available to the AU such as earnings, contributions from parents, TANF, etc. All educational assistance income must be verified.

See [WAC 388-450-0035](#) to determine how a client's educational income may impact their benefits.

- **Resources:**

Educational income is not counted as a resource during the period of time the income is expected to cover (usually the school term).

**EXAMPLE**

Jake received a GSL of \$5,000 for the school term of September 1 through May 24. He put the money into a savings account to use as needed during the school months. The \$5,000 is excluded as a resource until it is no longer considered income (May 25).

- **Case Documentation:**

Document in a case record how you determined that a student was eligible for Basic Food along with how you verified that the student is eligible for benefits. The verification may be obtained from the student, source, or school. Examples of verification are:



- **Responsibility for child:** Student's statement he/she is responsible for the child if there is an age appropriate child in the household. His/her explanation about the availability of adequate child care should be written and is acceptable, unless questionable. If questionable, further clarification is needed. For example, if the non-student parent in a two parent household is not employed, but the student claims to provide more than half the care for a child in the home, further inquiry and documentation is warranted to explain why the non-student parent does not provide the majority of care.
- **Physical or mental impairment:** If the disability is evident to the worker, no further verification is required. If not, verification may consist of temporary or permanent disability payments (paid because the individual is unable to work) from governmental or private sources (SSA, SSI, etc.), or a statement from the individual's physician or licensed or certified psychologist that the individual is unable to work.
- **School status:** Statement from the student that he/she is enrolled at least half time is acceptable unless questionable. If questionable, verification is required (examples; awards letter, statement from school regarding number of credit hours student is attending and how many credit hours are needed for at least half-time, etc.). Some schools may indicate the student is attending "part time." This must be clarified, as this does not mean "less than half time."
- **“Eligible to participate” in Anticipating Work Study: During the COVID-19 public health emergency, a school may determine a student is “eligible” to participate in work study without being awarded work study as part of their financial aid. A student’s statement that they can reasonably expect or foresee being assigned a work study job is acceptable. The client still needs to provide proof they are approved work study as defined by the institution of higher education. A student can provide proof they have been awarded work study or notice from the school that they were deemed "eligible."**
- **Income eligibility:** Work Study, TRA/TAA, and WIA may be verified by the student (awards letters, copies of checks, etc.), school (financial aid officer), or source (Job Services). TANF may be verified via ACES.
- **On-the-job Training:** Documentation from the employer that the individual is attending school as part of the employee's training.
- **BFET enrollment:** Basic Food applicants accepted for enrollment in an institution of higher education through the Basic Food Employment and Training program will provide a letter from the school ([BFET partner college](#)) indicating the student is enrolled in an approved program of study and will be accepted into the BFET program contingent upon DSHS approval of Basic Food benefits. See [WAC 388-444-0015](#) for more information about BFET.