## CAPLAW enews brief

## SNAP Recipients Now Categorically Eligible for Head Start

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On April 21, 2022, the Office of Head Start (OHS) issued Information Memorandum ACF-IM-HS-22-03 extending categorical eligibility for Head Start services to families eligible for or receiving Supplemental Nutrition Assistance Program (SNAP) benefits. SNAP recipients are now automatically eligible for Head Start services even though SNAP has slightly higher income thresholds than the base income threshold for Head Start services. Because eligibility is categorical, Head Start programs do not need to verify the income of SNAP recipients as part of the eligibility determination process.

The Head Start Act states that children are eligible for Head Start services "if their families' incomes are below the poverty line, or if their families are eligible or, in the absence of child care, would potentially be eligible for public assistance" (Section 645(a)(1)(B)(i)). Until now, OHS has interpreted "public assistance" to only count Temporary Assistance for Needy Families (TANF) or Supplemental Security Income (SSI) benefits. OHS notes that adding SNAP to the list of "public assistance" benefits will streamline the process of families navigating multiple federal program eligibility processes, and align and coordinate benefit programs to make it easier for families to access services. However, Head Start programs should continue to adhere to their recruitment and selection criteria and prioritize enrollment for those who may benefit most from program services.

The information memorandum is effective immediately, so Head Start programs should update their policies and procedures for eligibility and enrollment to include categorical eligibility through receipt of SNAP benefits. To demonstrate SNAP receipt or eligibility, families may provide a copy of notice of approval for SNAP benefits, an Electronic Benefit Transfer card with a SNAP ID number, or other documentation from a state, local, or tribal public assistance agency. A self-attestation is not sufficient. OHS has updated its Head Start Eligibility Verification Form to include categorical eligibility through SNAP.

OHS has also issued a set of FAQs addressing some questions about SNAP categorical eligibility that have arisen since the issuance of the information memorandum. Of note, the FAQ clarifies that:

• This interpretation does not increase a program's funded enrollment, but may allow programs to find additional eligible families to add to their waitlist or fill any vacant slots.

- Even though states have flexibility in setting state SNAP eligibility guidelines, Head Start programs will consider all SNAP recipients eligible for services regardless of where they live.
- Eligibility for or receipt of SNAP would deem a family eligible for Head Start services, regardless of the amount of SNAP benefits received, so Head Start programs do not need to inquire about actual benefit amounts.

CAAs can read the rest of the FAQs here or view a webinar about SNAP and Head Start eligibility here.

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<sup>&</sup>lt;sup>1</sup>The Head Start Act also grants categorical eligibility to children experiencing homelessness and those in foster care.