

The #RealCollege Student Implications of The Families First Coronavirus Response Act (FFCRA)

Carrie R. Welton and Marissa Meyers

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The Families First Coronavirus Response Act (FFCRA) was enacted on March 18th, 2020 to address the needs of families impacted by COVID-19.¹ The pandemic has created a dire situation for many individuals and families, this includes millions of #RealCollege students, who no longer have a steady source of income, child care and may be infected with COVID-19.

Research shows that sizable numbers of #RealCollege students were unable to meet their basic needs prior to the COVID-19 pandemic.² The situation has become even more difficult due to job losses, college and k-12 school closures, and health challenges. While the FFCRA does not specifically target college students, it does offer new resources that may provide critical support for students that may help them continue their education.

Support for students in need of food

The FFCRA did not change the student eligibility requirements in the Supplemental Nutrition Assistance Program (SNAP) program. As such, SNAP benefits still apply only to students who attend an institution of higher education at least half-time. Students enrolled less than half-time may still be eligible for SNAP under the standard eligibility rules but are not subject to the student exceptions. However, the following changes to SNAP in the FFCRA targeted to the general population may still benefit students.

- Students who currently receive SNAP may be eligible for emergency benefits to address temporary food needs. If they also have children that attend a school that is closed but who would otherwise receive a free or reduced-price meal, they may receive additional replacement benefits through their existing SNAP case. If eligible, households could receive both supplements.
- Students who do not presently receive SNAP but who meet this criterion may also receive these supplemental benefits, but they must first apply for SNAP and be deemed eligible.
- Students under the age of 50 who do not have a dependent child in the home (referred to as Able Bodied Adults Without Dependents or ABAWDs) and who do not meet a student exemption under SNAP's rules might be eligible for SNAP due to the temporary suspension of the work requirement's 3 month time limit. *Most students would not have been subjected to this restriction due to their student status so this only impacts a small segment.*

- Students may experience less administrative burden when applying for or renewing SNAP during this time since states have new flexibility to change the interviews process, extend certification periods, and relax some verification requirements.

Students who need health care coverage and/or COVID-19 testing

- The FFCRA requires that private health insurance plans and Medicaid plans cover COVID-19 testing, including urgent care and emergency room visit related expenses at no additional cost.
- If a student is uninsured and need testing, they may be eligible for a free test. Some states are also extending Medicaid eligibility for the purpose of COVID-19 testing. This may only apply to the test and not subsequent care or services from a positive test result.
- Students may apply for Medicaid, which provides no-cost health insurance. They may be newly eligible if they have experienced a job loss. Some states are also opening enrollment in their state health insurance exchanges temporarily.

Financial support for students with children who have lost of a job or experienced a disruption in work

The FFCRA expanded the Family Medical Leave Act (FMLA) by providing 12 weeks of paid public health emergency leave from March 18, 2020 until Dec. 31, 2020.

- The leave is limited to *only those who have a son or daughter* under the age of 18 who are unable to work due to a school closing or loss of child care due to the pandemic.
- Students who were recently employed either full or part-time for at least 30 days may be eligible for up to two-thirds of their wages (after a 10-day waiting period) if they experienced a job loss or disruption.
- This applies only to employees who were employed by a private employer with less than 500 employees and some government employees. *Health care and emergency responder employers may opt out of this requirement.*

Financial Support for students who have lost of a job or experienced a disruption in work due to their or a family member's illness

For the first time ever, Congress passed a provision to require paid sick leave. It begins 15 days after the bill's enactment and extends through Dec. 31, 2020

- Students who were recently employed full or part-time – regardless of duration— who are experiencing a job loss or disruption *due to a coronavirus related quarantine or illness of their own or a family member* may be entitled to paid sick leave.
- Full-time workers may be eligible for up to 80 hours of paid leave while part-time employees may receive the equivalent of their average number of hours for a two-week period. This benefit is available immediately.

- This sick leave is an addition to any existing leave an employee may already receive through their employer. Employers cannot require an employee to take existing leave first. Employers cannot require an employee to find a replacement to use this leave. This sick leave applies only to those who employees who are subject to:
 - A government -mandated quarantine related to COVID-19
 - A health provider orders to self-isolate due to concerns related to COVID-19
 - Experiencing symptoms of COVID-19 and seeking a medical diagnosis
 - Experiencing any other “substantially similar condition”
 - Caring for an individual subject to a quarantine/isolation order by the government or a health care provider
 - Caring for a son or daughter whose school or place of care is closed, or whose child care provider is unavailable because of COVID-19

Recommendations to Higher Education

Given the complexity of students’ challenges during COVID-19, we recommend that colleges and universities and other non-governmental organizations take actions to help students evaluate their eligibility for these programs. These critical government resources may help fill in financial shortfalls at a time when higher education institutions are experiencing shortfalls of financial aid and emergency assistance. To connect students to these benefits, you may wish to refer students to a local agency or community-based organization if you are unsure how to help them complete and application and determine eligibility.

Notes and References

¹ [Families First Coronavirus Response Act \(FFCRA\)](#), H.R.6201, 116th Congress. (2019-2020); our analysis of the FFCRA is a summary, not a comprehensive account of each provision in the bill.

² Baker-Smith, C., Coca, V., Goldrick-Rab, S., Looker, E., Richardson, B. & Williams, T. (2020). [#RealCollege 2020: Five Years of Evidence on Campus Basic Needs Insecurity](#). The Hope Center for College, Community, and Justice.

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