

Belit Stockfleth  
Authorized Signature

Number: SS-IM-09-041  
Issue Date: 07/15/2009

Topic: Food Benefits

Subject: Acting on changes in student status for FS

**Applies to (check all that apply):**

- |                                     |                               |                                     |                                      |
|-------------------------------------|-------------------------------|-------------------------------------|--------------------------------------|
| <input type="checkbox"/>            | All DHS employees             | <input type="checkbox"/>            | County Mental Health Directors       |
| <input checked="" type="checkbox"/> | Area Agencies on Aging        | <input type="checkbox"/>            | Health Services                      |
| <input checked="" type="checkbox"/> | Children, Adults and Families | <input checked="" type="checkbox"/> | Seniors and People with Disabilities |
| <input type="checkbox"/>            | County DD Program Managers    | <input type="checkbox"/>            | Other (please specify):              |

**Message:** In recent months, the number of FS policy questions about higher-ed students has increased. We believe this reflects both the number of people who are pursuing education as a way to get ahead in a poor economy and those who can no longer afford college due to that same economic downturn. Most of the questions are about how, whether and when to act on reported changes in student status. The following Q&A section is meant to help staff determine how to act, given that no FS reporting system requires clients to inform DHS about changes to student status.

Each and every answer includes the requirement to narrate for later follow-up.

Please continue to send your questions to the FS Policy Unit.

Q&As

Student Status

An applicant has finished her degree program, but is taking a noncredit, daily class to study for the bar exam. Does she need to meet student criteria?

*No. This is essentially a study group, not higher education.*

An applicant just [graduated from high school, got out of prison, got laid off, etc.] and has registered for fall term. Does he have to meet student status during the summer?

*No. Student status begins with the month that the student begins higher ed.*

Recert is done in July. The client states his intention to attend college starting in September. When does he have to meet student criteria?

*At the next recert. No changes related to student status have to be reported during the certification period.*

Recert is done in August. The client states she has registered for fall term and is starting college in September. When does she have to meet student criteria?

*At recert. Unless you are determining eligibility in the month that higher ed begins, the client is not considered a student.*

### Verifying Student Income

The worker has determined a student is ineligible. Should she pend for the student aid award letter to look for work study?

*No. The eligibility worker should review student criteria ([FS-D.3](#)) with the client to determine eligibility and accept their statement about whether they are in a work study job.*

Most student income is excluded. Why can we not accept the student's statement that they have title IV income only?

*Any potentially countable income has to be verified. If any educational income is countable, be sure to use the interactive [DHS 7351](#) to deduct costs and determine the monthly amount remaining.*

### Processing the Interim Change Report ([DHS 852](#))

Why does the [DHS 852](#) include questions about students if we are not supposed to ask?

*The [DHS 852](#) was revised in May to remove the question about students. In addition, we are eliminating the mention of work study income in the FS portion of the form. That change is expected to take place in August when current stock of the [DHS 852](#) is used up.*

When the [DHS 852](#) is received, the client notes one of the household members is now a student. If they do not provide any verification of student status, does the worker need to take action?

*The question has been removed from the [DHS 852](#) because it is against federal regulations for us to ask questions about student status at Interim Report. There is not enough information to determine if the person would meet student eligibility criteria, so no action should be taken.*

If they do provide verification of student status, does the worker need to take action?

*Verification of being a student does not provide all the information needed to verify whether someone is an eligible student, so no action is necessary.*

What if they report the student has educational income – does that need follow-up? *Any time income is reported on the Interim Report it does need to be verified. If you have enough information to determine that the educational income will be excluded (loans, title IV) then you would not need to follow up. However, if the income is countable, you need to know whether the person is an eligible/ineligible student.*

Changes Not Reported on [DHS 852](#)

An ineligible student client reports on a change report she is not going to school anymore. Do we change this or wait until recert or cert?

*We consider this a request for benefits. Call the former student or send a [DHS 210A](#) to collect the information needed to add her to the ongoing case.*

An ineligible student client reports on a change report she is not going to school and has income. Do we add the student and the income on? **OR** do we wait until cert or recert time?

*We consider this a request for benefits. Call the former student or send a [DHS 210A](#) to collect the information needed to add her and her income to the ongoing case.*

A client on an open case reports that he is now attending college. Based on information from the last cert, he is not an eligible student. How do we act?

*Clients are not required to report anything on student status during the cert. We will not know if he is an eligible student unless we go through all the criteria in [FS-D.3](#). So narrate only and do not pursue until REC.*

A student client states she dropped out of school after the spring term and does not intend to return in fall. Does this need to be verified before making her eligible?

*No. Clients do not have to verify student status. In most cases, it is not possible to verify that someone does not intend to re-enroll in college. Have a conversation with the client. If they say they are not going to return in the fall, accept their statement. If you find their statement questionable, ask yourself why. You need to have a specific, compelling and narrated reason why the statement is questionable and send a pending form that requests reasonable proof.*

*If you have any questions about this information, contact:*

<b>Contact(s):</b>	FS Policy Unit		
<b>Phone:</b>	(503) 945-5600	<b>Fax:</b>	(503) 373-7032
<b>E-mail:</b>	Policy, FS or FS.Policy@state.or.us		