

SNAP and Wraparound Services Data Use



Supplement to DISC's FAQs on Access, Disclosure, and Use of Federal Student Aid Data

OVERVIEW

This supplement expands on the Data Integration Support Center's (DISC) "[Access, Disclosure, and Use of Federal Student Aid Data](#)," which provides answers to frequently asked questions (FAQs) about Family Education Rights and Privacy Act (FERPA), Higher Education Act (HEA), and Privacy Act of 1974 compliance. This document addresses additional questions about using Free Application for Federal Student Aid (FAFSA) data for research on Supplemental Nutrition

Assistance Program (SNAP) benefits and wraparound support services.

To use this supplement effectively, readers should first review "[Access, Disclosure, and Use of Federal Student Aid Data](#)" to understand FERPA exceptions, HEA provisions, and written agreement requirements because this supplement builds upon those foundational concepts.

NOTE: This supplement is intended for informational purposes only and does not constitute legal advice. For legal interpretation or decisions, consult your agency's legal counsel. DISC is available to meet with legal teams to provide clarification or discuss specific use cases; email info@disc.wested.org.

CONTENTS

QUESTIONS

1	What key clarifications about SNAP research were provided in the recent guidance?	3
2	How do we determine whether HEA, FERPA, or the federal Privacy Act applies to SNAP research?	3
3	Can de-identified FAFSA data be shared with SNAP agencies for research without an "appropriate use case"?	4
4	Our state partners with SNAP agencies through our statewide longitudinal data system (SLDS) to build multiagency datasets for research. What does the guidance say about this use?	5
5	As a community college, can we use FAFSA data with SNAP participation data to evaluate the effectiveness of our programs in supporting student success?	6
6	Can data obtained from sources that are subject to HEA be used for SNAP-related research purposes?	7
7	What additional best practices should our organization follow when conducting SNAP and wraparound services research?	8

TABLES

Q1	SNAP Research Clarifications and Allowable Use Cases	9
Q2	FAFSA SNAP Data Use by Regulation	10
Q3	FAFSA De-Identified Data Use in SNAP Research	11
Q4	Multiagency Use of FAFSA Data With SNAP Agencies	12
Q5	Community College Use of FAFSA SNAP Data for Program Evaluation	13
Q6	HEA Regulatory Requirements for SNAP Research Using FAFSA Data	14

	SIMPLIFIED APPLICABILITY MATRIX	15
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	REGULATORY CITATIONS	15
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	ACRONYMS	15
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QUESTION
1

What key clarifications about SNAP research were provided in the recent guidance?

[GENERAL-24-129](#) clarifies that research examining the relationship between SNAP participation and educational outcomes is an explicitly authorized use of FAFSA data. This clarification represents an important expansion of understood use cases beyond traditional financial aid administration.

In particular, the guidance confirms the following:

- Research on food insecurity's impact on persistence and completion is valid under HEA.
- SNAP agencies can receive FAFSA data as authorized representatives under FERPA.

- Wraparound services evaluation aligns with federal education program support.
- Written agreements can facilitate cross-sector research while maintaining privacy.

This clarification helps institutions and agencies understand that student basic needs research, including food security studies, directly relates to the educational outcomes that FERPA and HEA are designed to support.

*See Table Q1: SNAP Research Clarifications
and Allowable Use Cases.*

QUESTION
2

How do we determine whether HEA, FERPA, or the federal Privacy Act applies to SNAP research?

The applicable privacy provision for SNAP research depends on the source of the data and the entity conducting the research, following the same framework as other FAFSA data uses:

- **HEA:** Applies when using FAFSA data received directly from Federal Student Aid (FSA) systems for research on how SNAP affects attendance, persistence, or completion.
- **FERPA:** Applies when educational institutions share their maintained records (including FAFSA data) with SNAP agencies or researchers studying food insecurity impacts.
- **Federal Privacy Act:** Governs federal agency use but typically does not apply to institution- or state-conducted SNAP research.

- **Federal Tax Information (FTI):** Within FAFSA data, cannot be used for SNAP research under any circumstance, as it remains governed by Internal Revenue Code (IRC) § 6103.

Most SNAP education research operates under FERPA's Audit or Evaluation Exception when institutions share data with state agencies or under HEA's research provisions when using FSA-provided data directly.

See Table Q2: FAFSA SNAP Data Use by Regulation.

QUESTION
3

Can de-identified FAFSA data be shared with SNAP agencies for research without an “appropriate use case”?

Not exactly. While properly de-identified data are not subject to privacy restrictions, the initial access to create de-identified datasets for SNAP research must comply with applicable laws.

The process requires the following:

- an allowable use case to access identifiable data initially
- compliance with FERPA or HEA during the de-identification process
- documentation that the research supports educational outcomes
- written agreements even for de-identified data sharing (best practice)

For SNAP research specifically, the appropriate use case is evaluating how food assistance programs support student persistence and completion. This use case qualifies under both FERPA's Audit or Evaluation Exception and HEA's research provisions.

Best Practice

The following is a best practice for ensuring proper use of de-identified data:

- Even after de-identification, maintain agreements **specifying that data will be used only for educational outcomes research**, not for SNAP program administration.

See Table Q3: FAFSA De-Identified Data Use in SNAP Research.

QUESTION
4

Our state partners with SNAP agencies through our statewide longitudinal data system (SLDS) to build multiagency datasets for research. What does the guidance say about this use?

GENERAL-24-129 affirms that using SLDS platforms to integrate FAFSA and SNAP data for research is permissible when properly structured. The guidance recognizes that states are modernizing their data infrastructure to support cross-sector research on factors affecting educational success.

REGULATORY INSIGHT: The guidance acknowledges that food insecurity is a legitimate factor affecting educational outcomes, making SNAP data integration appropriate for comprehensive student success research.

Key Compliance Requirements

- **Written Agreements:** Agreements must specify that SNAP data integration serves educational research purposes.
- **Allowable Use Case:** Research must focus on educational outcomes, not SNAP administration.
- **Privacy and Security Controls:** Standard SLDS protections apply to integrated datasets.
- **No Unauthorized Redisclosure:** SNAP eligibility determinations cannot use FAFSA data.
- **Statistical Purpose Only:** Individual-level data cannot be used for operational decisions.

*See Table Q4: Multiagency Use of FAFSA Data
With SNAP Agencies.*

QUESTION
5

As a community college, can we use FAFSA data with SNAP participation data to evaluate the effectiveness of our programs in supporting student success?

Yes. Community colleges are explicitly permitted to combine FAFSA data with SNAP participation information to evaluate how their programs support students experiencing food insecurity. This evaluation directly relates to program effectiveness in promoting retention and completion.

This use is permissible under FERPA's Audit or Evaluation Exception because food security significantly affects students' ability to succeed academically. The evaluation can examine the following:

- retention rates for SNAP participants versus nonparticipants
- credit accumulation patterns
- program completion rates
- impact of campus food pantries or emergency aid

Key Compliance Requirements

- **Outcome Evaluation:** Focus evaluation on educational outcomes.
- **Agreement Documentation:** Maintain written agreements with data providers.
- **De-Identified Data:** Ensure that individual students cannot be identified in reports.
- **Program Enhancement:** Use findings to improve institutional programs.
- **Data Disposal:** Destroy or return data after evaluation completion.

See Table Q5: Community College Use of FAFSA SNAP Data for Program Evaluation.

QUESTION
6

Can data obtained from sources that are subject to HEA be used for SNAP-related research purposes?

Yes. Data received directly from HEA-governed sources—such as FAFSA data received via institutional student information records (ISIRs) or the Student Aid Internet Gateway (SAIG)—can be used for research examining SNAP's impact on educational outcomes under HEA Section 483(a)(3)(B)(ii).

HEA explicitly permits using FAFSA data for research that promotes college attendance, persistence, or completion. Research on how SNAP participation affects these outcomes clearly falls within this authorization for the following reasons:

- Food insecurity directly affects academic performance.
- SNAP support removes barriers to persistence.
- The research aims to improve student success.

Key Compliance Requirements

- **Agreement Compliance:** Written agreements must conform to HEA Section 483 standards.
- **Confidentiality Enforcement:** Research must maintain strict confidentiality protections.
- **Student Anonymity:** Individual students cannot be publicly identified.
- **Outcome Focus:** Focus must remain on educational outcomes.
- **Data Protection:** Data safeguards must prevent unauthorized redisclosure.

*See Table Q6: HEA Regulatory Requirements
for SNAP Research Using FAFSA Data.*

QUESTION
7

What additional best practices should our organization follow when conducting SNAP and wraparound services research?

The following are best practices for enhancing compliance and research quality when conducting SNAP-related studies using FAFSA data.

Best Practices

- **Clear Research Protocols:** Document how SNAP participation relates to specific educational outcomes before accessing data. Define measurable outcomes such as retention rates, credit accumulation, or time to degree.
- **Research Distinguished From Operations:** Ensure that all parties understand that FAFSA data cannot flow into SNAP eligibility systems. Create technical and policy barriers between research and operational databases.
- **Regular Compliance Reviews:** Audit SNAP research projects quarterly to ensure that they maintain educational focus and comply with agreements. Document that no eligibility determinations use FAFSA data.
- **Stakeholder Communication:** Clearly communicate to SNAP agencies that they receive data as “authorized representatives” for educational evaluation only, not for program administration.
- **Data Minimization:** Request only the FAFSA elements that are necessary for research questions. Avoid collecting full FAFSA records when only Student Aid Index (SAI), household size, and enrollment status are needed.
- **Transparent Reporting:** Publish research findings to demonstrate public benefit while maintaining strict confidentiality. Share results with both education and SNAP communities to improve services.

**TABLE
Q1**

SNAP Research Clarifications and Allowable Use Cases

Use Case	Description	Requirements and Examples	Consent Required?
Permissible Use Case: Food Insecurity Research	Examining how SNAP affects attendance, persistence, and completion	<ul style="list-style-type: none"> Comparing retention rates between SNAP and non-SNAP students Analyzing credit accumulation patterns Studying time to degree completion Evaluating campus food pantry effectiveness 	No
Permissible Use Case: Program Evaluation	Assessing institutional support services for students with basic needs	<ul style="list-style-type: none"> Evaluating emergency aid programs Measuring the impact of wraparound services Analyzing intervention effectiveness Studying holistic support models 	No
Permissible Use Case: Policy Research	Informing state/federal policy on student basic needs	<ul style="list-style-type: none"> Conducting multi-institutional studies Analyzing state-level outcomes Evaluating federal programs Conducting cost-benefit analysis 	No
Third-Party Disclosure: SNAP Agencies	Sharing with state SNAP agencies for research purposes	<ul style="list-style-type: none"> SNAP agency as authorized representative Written agreement required Educational outcomes focus Statistical use only 	No
Third-Party Disclosure: Research Organizations	Studying food insecurity	<ul style="list-style-type: none"> FERPA Studies Exception compliance De-identification requirements Destruction timeline specified Aggregate reporting only 	No
Prohibited Use: Eligibility Determination	Using FAFSA data to determine SNAP eligibility	<ul style="list-style-type: none"> NOT PERMITTED under any exception 	N/A

TABLE
Q2

FAFSA SNAP Data Use by Regulation

Regulation	Scope and Applicability	Data Types Covered	Key Provisions for SNAP Research	Primary Citations
HEA	FAFSA data directly from the U.S. Department of Education for SNAP impact research	SAI, household size, enrollment status, Pell Grant eligibility (non-FTI elements)	<ul style="list-style-type: none"> Permits research on barriers to attendance/completion. Requires confidentiality protections. Allows food insecurity studies. Is for statistical purposes only. 	20 U.S.C. §1090(a)(3)(B)(ii)
FERPA	Education records maintained by higher education institutions shared with SNAP researchers	Student records including FAFSA data, enrollment, academic performance	<ul style="list-style-type: none"> Audit or Evaluation Exception for program effectiveness Studies Exception for research Authorized representative provisions Written agreement requirements 	34 CFR § 99.31(a)(3) 34 CFR § 99.31(a)(6)
Privacy Act	Federal SNAP data systems	SNAP participation records at federal level	<ul style="list-style-type: none"> Routine use provisions Generally not applicable to institution-conducted research Applicable to federal evaluations 	5 U.S.C. § 552a
IRC	FTI within FAFSA	Income and tax data imported from the Internal Revenue Service	<ul style="list-style-type: none"> CANNOT be used for SNAP research. Allows no exceptions for educational research. Remains restricted even if de-identified. 	IRC § 6103

**TABLE
Q3**

FAFSA De-Identified Data Use in SNAP Research

Category	Key Points	Specific Provisions	Regulatory Basis
De-Identified Data	No longer constitute personally identifiable information.	<ul style="list-style-type: none"> • Are exempt from privacy restrictions once properly de-identified. 	General privacy principles
Creation Requirements: Initial Data Access	Must have appropriate use case to access identifiable data.	<ul style="list-style-type: none"> • Qualifies as evaluating educational program effectiveness. 	34 CFR § 99.31(a)(3)
Required Use Case: FERPA Compliance	Must fall under the Audit or Evaluation Exception or the Studies Exception.	<ul style="list-style-type: none"> • Evaluating how food assistance supports educational outcomes is explicitly permitted. 	34 CFR § 99.31(a)(3) 34 CFR § 99.31(a)(6)
Required Use Case: HEA Compliance	Must promote attendance, persistence, or completion.	<ul style="list-style-type: none"> • Food insecurity research directly relates to these outcomes. 	20 U.S.C. § 1090(a)(3)(B)(ii)
SNAP-Specific Considerations	De-identification does not change purpose restrictions.	<ul style="list-style-type: none"> • Cannot flow to eligibility systems. • Must remain in research context. • Should specify limitations in agreements. 	Best practices
Matching Process	Initial matching requires authorization.	<ul style="list-style-type: none"> • Link FAFSA and SNAP records under exception. • De-identify for analysis. • Destroy identifiers after matching. 	FERPA requirements
Research Use	Broad analysis is permitted after de-identification.	<ul style="list-style-type: none"> • Longitudinal studies • Multistate comparisons • Predictive modeling • Policy evaluation 	No restrictions on de-identified data

TABLE
Q4

Multiagency Use of FAFSA Data With SNAP Agencies

Requirement Category	Specific Requirements	Implementation Details	Regulatory Basis
Written Agreements: Mandatory	Comprehensive data-sharing agreement required	<ul style="list-style-type: none"> Define SNAP research purposes. Specify FAFSA elements shared. Clarify educational outcome focus. Include confidentiality provisions. 	34 CFR § 99.35
FERPA Audit or Evaluation Exception	SNAP agency as authorized representative	<ul style="list-style-type: none"> Evaluating education program support Not for SNAP administration Statistical purposes only Bound by FERPA requirements 	34 CFR § 99.31(a)(3)
SLDS Integration	Centralized research platform	<ul style="list-style-type: none"> SNAP data as research variable Technical separation from operations Access controls for researchers Project-based authorization 	GENERAL-24-129 recognition
Prohibited Uses	Clear boundaries established	<ul style="list-style-type: none"> No SNAP eligibility determination No individual benefit calculations No operational decision-making No noneducational research 	FERPA limitations
Security Requirements	Standard SLDS protections apply	<ul style="list-style-type: none"> Encryption requirements Access logging Role-based permissions Regular audits 	34 CFR § 99.31(a)(3)(iii)
Research Outputs	Only aggregate reporting allowed	<ul style="list-style-type: none"> Statistical summaries Suppression for small cells No individual identification Public benefit focus 	Privacy requirements

TABLE
Q5

Community College Use of FAFSA SNAP Data for Program Evaluation

Authorization Category	Specific Provisions	Implementation Requirements	Regulatory Basis
Institutional Eligibility	Community colleges as Title IV recipients	<ul style="list-style-type: none"> • Must maintain active Title IV participation to use FAFSA data for evaluation. 	Title IV requirements
Data Sources Permitted	FAFSA and SNAP participation records	<ul style="list-style-type: none"> • SAI, household size, enrollment status • SNAP participation dates • Benefit receipt (yes/no) • All FTI excluded 	GENERAL-24-129
FERPA Audit or Evaluation Exception	Program effectiveness evaluation	<ul style="list-style-type: none"> • Food security impact on retention • Support services effectiveness • Student success factors • Completion barriers 	34 CFR § 99.31(a)(3)
Evaluation Scope	Educational outcomes focus	<ul style="list-style-type: none"> • Semester-to-semester retention • Credit accumulation • Program completion • Transfer rates 	34 CFR § 99.31(a)(3)
Required Agreements	Written documentation mandatory	<ul style="list-style-type: none"> • Purpose specification • Data elements listed • Timeline defined • Destruction requirements 	34 CFR § 99.35
Consent Requirements	Not required under exception	<ul style="list-style-type: none"> • Individual consent not needed when properly applying Audit or Evaluation Exception 	34 CFR § 99.31(a)(3)
Best Practices	Institutional research standards	<ul style="list-style-type: none"> • Institutional Review Board review recommended • Clear research questions • Defined outcomes • Regular compliance review 	Professional standards

TABLE
Q6

HEA Regulatory Requirements for SNAP Research Using FAFSA Data

Requirement Category	Specific HEA Requirements	Implementation Details	Regulatory Basis
Applicable Data Sources	Data from FSA systems	<ul style="list-style-type: none"> ISIR data SAIG transmissions Federal loan data FTI elements excluded 	20 U.S.C. §1090
Authorized Research Purpose	Promote attendance, persistence, or completion	<ul style="list-style-type: none"> Food insecurity barriers Basic needs impacts Support service effectiveness Wraparound program evaluation 	20 U.S.C. §1090(a)(3)(B)(ii)
SNAP Research Alignment	Direct connection to educational success	<ul style="list-style-type: none"> SNAP reduces food insecurity. Food security improves academic performance. Research documents this relationship. Findings inform interventions. 	HEA authorization
Written Agreements	HEA Section 483 compliance	<ul style="list-style-type: none"> Research scope defined Confidentiality guaranteed Statistical purpose stated No individual identification 	20 U.S.C. §1090(a)(3)(B)(ii)
Confidentiality Requirements	Strict protection mandated	<ul style="list-style-type: none"> No public identification Aggregate reporting only Secure data handling Limited access 	HEA requirements
Permissible Analyses	Educational outcome studies	<ul style="list-style-type: none"> Regression analyses Propensity score matching Longitudinal tracking Comparative studies 	Research authorization
Data Retention	Limited to research period	<ul style="list-style-type: none"> Defined in agreement Destruction required No permanent retention allowed Audit trail maintained 	Best practices

Simplified Applicability Matrix

NOTE: The applicable privacy provision depends primarily on the source, nature, and control of the FAFSA data being accessed or disclosed.

Data Source or Type	Governing Law	Citation
FAFSA Data Directly From Department of Education for SNAP Research	HEA and Privacy Act	20 U.S.C. § 1090 5 U.S.C. § 552a
Institution Records Shared With SNAP Agency	FERPA	34 CFR § 99.31(a)(3)
SLDS-Integrated SNAP Research	FERPA (typically)	34 CFR § 99.31(a)(6)
De-Identified Data After Processing	No restrictions	Privacy principles
FTI (Cannot Use for SNAP Research)	IRC	IRC § 6103

Regulatory Citations

- [Electronic Announcement GENERAL-24-129](#), Updated September 30, 2025
- [Electronic Announcement GENERAL-25-08](#), September 30, 2025
- **HEA General Provisions**, [20 U.S.C. § 1090](#)
 - HEA Section 483(a)(3)(B)(ii), [20 U.S.C. § 1090](#), research authorization
- **Privacy Act of 1974**, [5 U.S.C. § 552a](#)
- **SNAP Regulations**, [7 CFR Part 273](#) (student provisions)
- **FERPA**, [20 U.S.C. § 1232g](#)
 - FERPA Regulations, [34 CFR Part 99](#)
 - FERPA Audit or Evaluation Exception, [34 CFR § 99.31\(a\)\(3\)](#)
 - FERPA Studies Exception, [34 CFR § 99.31\(a\)\(6\)](#)
 - FERPA Written Agreement Requirements, [34 CFR § 99.35](#)
- **FTI Restrictions**, [IRC § 6103](#)

Acronyms

DISC: Data Integration Support Center

FAFSA: Free Application for Federal Student Aid

FAQ: Frequently asked question

FERPA: Family Educational Rights and Privacy Act

FSA: Federal Student Aid

FTI: Federal tax information

HEA: Higher Education Act

IRC: Internal Revenue Code

ISIR: Institutional student information record

SAI: Student Aid Index

SAIG: Student Aid Internet Gateway

SLDS: Statewide longitudinal data system

SNAP: Supplemental Nutrition Assistance Program