This work was supported by the Institute of Education Sciences, U.S. Department of Education, through Grant R305A220451 to The Regents of the University of California — Berkeley. The opinions expressed are those of the authors and do not represent views of the Institute or the U.S. Department of Education.



Addressing the barriers college students face when accessing CalFresh food benefits

JESUS CHAVARIN-RIVAS, ANNA DOHERTY, AND ELISE DIZON-ROSS

Many California college students face food and housing insecurity. CalFresh food benefits, known federally as the Supplemental Nutrition Assistance Program, or SNAP, can help students pay for food, but most students eligible for this support are not receiving it. To address the gap between eligibility and participation, the California Policy Lab (CPL) is building a new data system — in partnership with higher education and safety-net agencies in California — to examine the extent to which college students use safety-net benefits to help meet their basic needs, to estimate how benefit receipt affects educational outcomes, and to evaluate strategies designed to increase participation. As part of this portfolio of work, and to better understand the factors that may limit student participation in CalFresh, CPL collaborated with Jesus Chavarin-Rivas, a graduate student at UC Berkeley, to conduct 29 interviews with a selection of students, basic needs specialists, and local and state government representatives in California. While this work² was not a representative study of college student experiences statewide, it provided an initial picture of common barriers that may warrant further investigation by researchers and program administrators. This preliminary work suggests that some college students may lack awareness about CalFresh, be deterred by stigma and fear of adverse consequences, and face both misinformation about the complicated eligibility criteria for students and complex administrative processes when applying for food benefits.

A 2018-19 survey by the California Student Aid Commission found that one in three California college students faced food insecurity on a regular basis.³ Individuals can receive up to \$250 per month for groceries from CalFresh.⁴ But despite the prevalence of food insecurity, the majority of California's three million college students do not receive these benefits. Initial aggregate estimates suggest that only 18% of likely eligible California college students participate in the program.⁵ Qualifying for CalFresh is particularly complex for college students: the Food and Agriculture Act of 1977 and the Agricultural Act of 2014 exclude students from participating unless they meet other conditions, such as working an average

of 20 hours per week. But there are other factors that limit participation. At the federal level, the US Department of Agriculture identified students as a priority group for enhanced SNAP outreach efforts this year, citing lack of awareness and misinformation as key barriers to student participation. In California, new legislation additionally aims to address some of these barriers (AB-1278 and SB-173 (2019); AB-85, AB-396, AB-543 and AB-1326 (2021)).

To better understand why many eligible students don't access food benefits, CPL is linking data from higher education and safety net agencies in California. For the first time, CPL will be able to use anonymized individual level data to accurately estimate the rates at which students enroll in CalFresh, examine how participation rates differ across groups and affect educational outcomes, and evaluate strategies designed to increase student participation in CalFresh. To inform our analysis with a better understanding of the factors that limit participation in the program, CPL collaborated with Jesus Chavarin-Rivas, a graduate student at UC Berkeley, to consult with a selection of students, basic needs specialists, and representatives from local and state government in California. This brief summarizes the findings of this work, and includes strategies, identified by Chavarin-Rivas, which could be implemented at the county, college, and state and federal level to help raise awareness and increase student participation in the CalFresh program.

FINDINGS AND RECOMMENDATIONS

This brief is based on results of consultation conducted by Chavarin-Rivas, which comprised 29 semi-structured interviews and conversations from February to May 2021. This included 15 interviews with University of California and California Community College students, as well as interviews with basic needs and financial aid specialists and representatives from State and County agencies. The interview topics covered participants' perceptions of barriers to students' CalFresh access, the relevant systems shaping these obstacles, and opportunities for promoting student participation in CalFresh. Interview transcripts were thematically analyzed to identify distinct, common barriers, which were cross-referenced to existing literature on this topic. Based on this analysis, the following recommendations were developed, with the aim of increasing student participation in CalFresh and alleviating food insecurity across California's college campuses. Throughout this brief, recommendations are specified as being applicable to the state, county, and/or college levels.

"I am afraid...that this will somehow come back to me and harm my family when they try to get their green cards. I know people who choose not to apply because of this." —Community college student

Barrier 1. Stigma and fear

Students reported that the stigma associated with accessing CalFresh benefits, and the fear of adverse consequences, deterred them from applying for and participating in the program. Students reported:

- Marginalization, compounded by the perception that college is a privileged space for the elite.
- Concern that there were others more needy or more 'deserving' of receiving benefits.
- Hesitancy to share household information, especially for mixed-citizenship or immigration-status households who feared that enrolling would impact non-citizen family or friends, for example, because of the public charge rule, even though it does not apply to CalFresh.
- Fear that CalFresh participation would be 'public record' and negatively impact the student's career prospects.
- Fear of going into debt to repay overpaid funds, due to being erroneously awarded benefits.
- Shame and embarrassment associated with using the Electronic Benefits Transfer (EBT) card in public or with peers, due to judgment or others finding out the students have financial need.
- Anxiety around experiencing humiliation at check-out, not knowing what is and is not covered or available funds left to spend.
- Perceived loss of personal autonomy when becoming dependent upon benefits.

Recommendations to address stigma and fear

State, counties and colleges

1. Target CalFresh outreach to students — Easy-to-digest guidance that emphasizes student eligibility and how to apply could help reduce stigma and uncertainty driven by inaccurate information. Outreach could leverage frequently used platforms, such as social media. UC San Diego's The Hub Basic Needs Center uses Instagram to advertise when UCSD degree programs become approved under CalFresh and can help students qualify for benefits. Appendix Figure 1 further illustrates student eligibility criteria, including local degree programs approved under CalFresh.

- 2. Establish and fund positions for students to assist with CalFresh enrollment Students could be hired and trained to assist college campuses in their efforts to enroll students in CalFresh, similar to the Certified Enrollment Counselors (CECs) trained by Covered California to provide counseling and assistance for those applying for Covered California programs and Medi-Cal. This could help normalize receiving benefits among the student population. The legislature should provide resources for entities to hire and train students to provide CalFresh enrollment support. This could strengthen efforts under AB 1326 which will require a student liaison to be identified in all counties.
- 3. Make the EBT Card design and payment system less recognizable and more user friendly A less distinct or personalized card design could make paying with CalFresh funds in-store less recognizable and help alleviate the judgment that recipients reported feeling at check-out. CalFresh payment could be further simplified through existing mobile payment apps that are widely used on smart phones. The mobile-friendly BenefitsCal portal, which allows users to check their CalFresh balance on the go, will be rolling out statewide in 2023 and is already a step in the right direction.

"I was not sure why I was being asked for my parent's info. The food I obtain with these benefits is for me, not for them."

—Community college student

Barrier 2. Complex eligibility criteria

Compared to the non-student population, students are required to meet additional criteria to be eligible for CalFresh. Appendix Figure 1 illustrates the complexity of student eligibility. County workers reported that the complex criteria make processing student applications more difficult than non-student applications. Students reported confusion about whether they qualify and how to apply and recertify and difficulties meeting these extra requirements, such as:

- Confusion about what documentation is required to prove student status and eligibility.
- Uncertainty about whether to apply at their hometown or temporary college residence.
- Confusion about why parent/family information needs to

- be provided. (For students under 22 years of age living with parents, CalFresh rules require that they include their parents' income information in their applications, even if the student is covering their own expenses.)
- Difficulty meeting certain exemptions from the student eligibility rule. For example, students reported that the exemption of working an average of 20 hours per week was difficult to meet, given the time commitment required by full-time study and extracurricular activities.

Recommendations to address complex eligibility criteria — Federal and state

- 4. Simplify and expand student eligibility criteria for CalFresh The federal government could simplify student eligibility rules for SNAP. This could include making some temporary federal policies permanent, such as the expansion of eligibility to those eligible for work study and those with \$0 Expected Family Contribution (EFC) on their Free Application for Federal Student Aid (FAFSA). This change is currently proposed by the College Student Hunger Act of 2019⁶ and was a temporary expansion to CalFresh student eligibility due to the COVID-19 pandemic in 2021 (ACL 21-11).
- 5. Automatically notify eligible students if they are likely eligible Administrators and colleges could collaborate on an automated system using information already collected, where students are immediately notified if they meet a CalFresh student exemption. CPL is linking student-level financial aid, higher education, and safety net participation data, and these linked data could help facilitate this approach. CPL, in partnership with CSAC and CDSS, recently used these linked data to evaluate the effect of notifications sent to students likely eligible under the expansions described in Recommendation 4.

"I looked at the county website and I could not find eligibility information for college students. I had no idea if I was eligible. I gave up on applying on that occasion."

— UC Student

Barrier 3. Complex administrative processes

Program rules are determined by federal and state policy but applied by county eligibility workers when processing applications. Administrators and students reported challenges for processing applications, and accessing CalFresh, due to the complexity and evolving nature of student eligibility:

- Heavy workloads, and the complexity of eligibility rules that need mastering, were reported to cause difficulties in county worker recruitment, training, and retention.
- State, county and college level representatives reported a need for more advocacy and support during all stages of the CalFresh engagement process, including outreach, eligibility determinations, application assistance, interviews, and utilization of benefits.
- Students also reported dropping out of CalFresh at recertification, in part due to issues receiving reminder letters. Recertification involves the completion of additional paperwork and is required on an annual timeline, which is not aligned to the school year. If students move during the school year and do not notify the counties, recertification letters can be delayed or not delivered accurately. In prior research, CPL has also found that exits from CalFresh spike in months of recertification.⁷

Recommendations to address complex administrative processes — State and county

- **6. Employ county eligibility workers on college campuses** Newly approved AB-1326 requires at least one designated county employee to act as a liaison for higher education institutions within the county. These employees could help ensure that student eligibility is both well understood within the county, and that institutions are proactively seeking opportunities to encourage more students to seek CalFresh, such as by ensuring eligible programs are CDSS approved Local Programs to Increase Employability. Appendix Figure 1 illustrates student eligibility criteria.
- 7. Appoint and fund designated CalFresh enrollment specialists at counties Currently, eligibility workers process all public assistance programs. The legislature should provide resources to hire CalFresh enrollment specialists, including those who could focus on subgroups with more complex criteria. Eligibility

workers who specialize in the complex and evolving eligibility requirements for college students, for example, could help ensure up-to-date knowledge is provided to students, and strong partnerships exist between counties and colleges.

"We need to ensure...that county workers have the resources that are population/ audience specific, not general."

— College basic needs specialist

Barrier 4. Lack of financial and nutritional literacy

A lack of financial and nutritional literacy among students was also identified as a barrier to students effectively using CalFresh benefits and to the CalFresh objective of improving access to nutritious food for low-income individuals. Students reported not having experience with budgeting and with identifying and buying healthy food:

- Both school administrators and student interviewees
 raised students' lack of experience and lack of budgeting
 skills as impeding their ability to effectively use CalFresh
 benefits and plan out a monthly budget. Many reported
 spending all of their monthly CalFresh allotment on the
 day it was added to their EBT card.
- Students also reported having insufficient knowledge about how to shop for and put together nutritional and affordable meals. Students demonstrated a lack of awareness about what foods were healthy or unhealthy, and reported spending their monthly allotment on the most affordable, but not always nutritious, foods.
- Both school administrators and student interviewees suggested that students' budgeting struggles could be alleviated with basic financial and nutritional literacy education. While some college campus Basic Needs Centers do provide financial and nutritional literacy workshops, for the most part these are available once per semester and there is little awareness about them. This makes it difficult for busy students to attend.

Recommendation to address lack of financial and health literacy — Colleges

8 Make financial and nutritional literacy workshops available at dates and times that are accessible for students — College campuses with established Basic Needs Centers that already offer nutritional and financial literacy workshops could promote their services more broadly, for example through social media platforms, tabling events, announcements before classes, and flyers. The workshops should also be offered with more frequency and at varied times, allowing more students the opportunity to attend.

NEXT STEPS

The effort to increase access to CalFresh for students has been gaining momentum. Newly approved Assembly Bills 396, 543 and 1326 require the public higher education segments and counties to implement strategies to improve coordination between the state, counties and colleges, and to raise students' awareness of CalFresh during college, such as by providing information about CalFresh eligibility during orientation. Senate Bill 135 (2021) aims to expand access to food benefits for those eligible for CalFresh except for their citizenship status. The 2021 California Budget also allocated an additional \$160 million towards student basic needs, including for activities to enroll students in CalFresh and for community colleges to establish Basic Needs Centers and hire basic needs coordinators.⁸

In service of these efforts, the California Policy Lab has embarked on a major program of work, in partnership with CDSS, the California Student Aid Commission, the California Community Colleges Chancellor's Office, and the University of California Office of the President to study the usage of CalFresh benefits by California college students. This research will use a first-of-its-kind database that links administrative data from each of the participating agencies, making it possible to measure the share of students who are likely eligible for, and the share who are participating in CalFresh, how these rates differ across student groups, and how the program contributes to students' educational success. This linked database will also enable CPL to support our partners' efforts to increase student participation in CalFresh, by evaluating how outreach and direct assistance impacts student applications for, and enrollment in, the program.

ABOUT THE CALIFORNIA POLICY LAB

The California Policy Lab (CPL) seeks to improve the lives of Californians by working with the government to generate evidence that transforms public policy and to help address California's most urgent issues, including homelessness, poverty, criminal justice reform, and education inequality. CPL facilitates close working partnerships between policymakers and researchers at the University of California to evaluate and improve public programs through empirical research and technical assistance.

This research, part of a larger CPL initiative on college student participation in CalFresh, was supported by the Spencer Foundation (grant number 202200008). The views expressed are those of the authors and do not necessarily reflect the views of the Spencer Foundation. Please contact info@capolicylab.org if you are interested in learning more about this work or CPL.

ABOUT THE AUTHORS

Jesus Chavarin-Rivas is a recent graduate of the Master of Public Policy program from the Goldman School of Public Policy at UC Berkeley, where he also completed a BA. Previously, Jesus worked at the California Department of Health Care Services as an Associate Governmental Program Analyst, addressing health disparities for California's most marginalized communities. His main interests include improving access to safety-net benefits for underserved communities and working on health policy impacting immigrant communities. Jesus was commissioned by CPL to conduct this work as part of the UC Berkeley Master of Public Policy program. The judgments and conclusions of this work are not necessarily endorsed by the Goldman School of Public Policy or by any other agency.

Anna Doherty was a Research Manager at the California Policy Lab, UC Berkeley, where she focused on education and the social safety net. She managed relationships with several California government agencies to facilitate CPL's use of state administrative data to conduct policy-relevant research.

Elise Dizon-Ross is a Postdoctoral Scholar at the California Policy Lab, UC Berkeley, focusing on education research. She is a co-Principal Investigator on projects examining college student eligibility for and usage of CalFresh and examining variations in student outcomes across California community college regions.

REFERENCES

Assembly Bill 85 Budget Act of 2020, Chapter 4. Committee on Budget, California, 2020.

Assembly Bill 396 CalFresh: educational programs, California Legislature – 2021-2022 Regular Session.

Assembly Bill 543 Public postsecondary education: student orientation: CalFresh. California Legislature – 2021-2022 Regular Session.

Assembly Bill 1278 Public postsecondary educational institutions: public services and programs: internet website notification. California State Assembly (2019).

Assembly Bill 1326 Public social services: county liaison for higher education. California Legislature — 2021-2022 Regular Session.

California Department of Social Services (2020) Senate Bill 77 CalFresh Student Data Report, CalFresh Bureau, CDSS.

California Governor's Office (2021) 2021-22 State Budget Summary: Higher Education, Sacramento, State of California, Governor's Office.

California Student Aid Commission (2019) 2018-2019 Student Expenses and Resources Survey: An Initial Look at the Obstacles Students Face Affording Higher Education.

Chavarin-Rivas, J (2021) Improving College Student Access to CalFresh (SNAP benefits), Report for Advanced Policy Analysis, Goldman School of Public Policy, University of California, Berkeley.

College Student Hunger Act of 2019, H.R.3809, 116th Congress (2019-2020). S.2143 (2019).

Government Accountability Office (2018) Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits, December 2018.

Auxier, B. Anderson, M (2021) Social Media Use in 2021, Pew Research Center.

Senate Bill 173 CalFresh: Postsecondary student eligibility: Work Study, California State Senate (2019).

Senate Bill 464 California Food Assistance Program: eligibility and benefits, California Legislature – 2021-2022 Regular Session.

United States Department of Agriculture (2021) USDA Modernizes the Thrifty Food Plan, Updates SNAP Benefits, Press Release No. 0179.21.

United States Department of Agriculture (2021) *Policy Memo:*Supplemental Nutrition Assistance Program (SNAP) — Introduction of Priority Areas for State Outreach Plans. Food Nutrition Service, EO Guidance Document FNS-GD-2021-0064, 2021.

Unrath, M (2021) Pushed out by paperwork: Why eligible Californians leave CalFresh. California Policy Lab Policy Brief.

The California Policy Lab builds better lives through data-driven policy. We are an independent, nonpartisan research institute at the University of California with sites at the Berkeley and Los Angeles campuses.

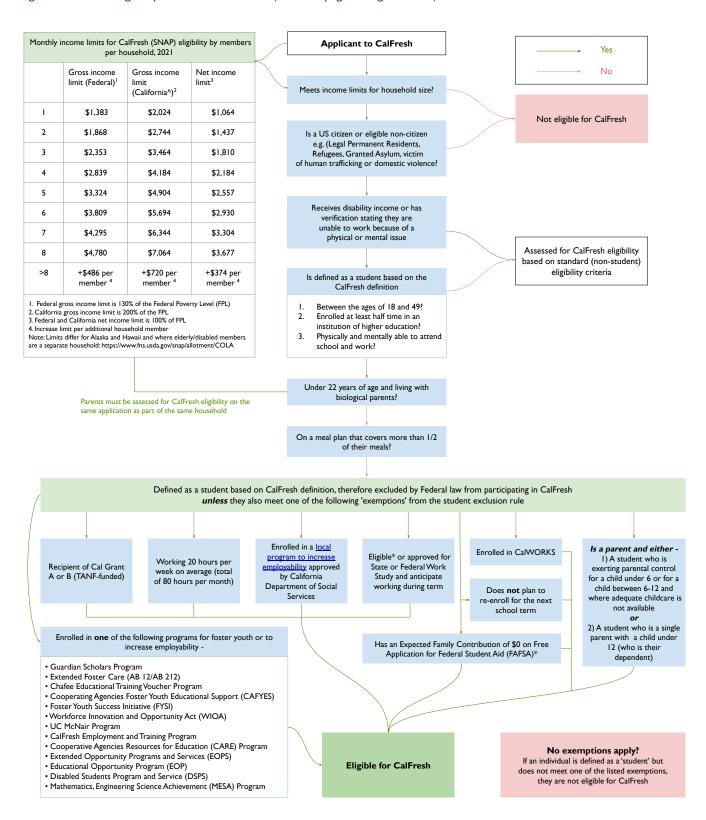
This research publication reflects the views of the authors and not necessarily the views of our funders, our staff, our advisory board, the California Department of Social Services, or the Regents of the University of California.

Endnotes

- 1 California Student Aid Commission (CSAC), 2019.
- 2 Chavarin-Rivas, 2021, Improving College Student Access to CalFresh (SNAP benefits), Advanced Policy Analysis, UC Berkeley.
- 3 Of 150,453 California college students surveyed, 35% were classified as food insecure and 35% were classified as housing insecure. CSAC, 2019.
- 4 US Department of Agriculture, 2021, USDA Modernizes Thrifty Food Plan, Updates SNAP Benefits
- $5 \quad \text{California Department of Social Services estimates} \ ^{\sim} 127,000 \ \text{of} \ ^{\sim} 700,000 \ \text{eligible college students are receiving CalFresh.} \ 2020.$
- 6 The College Student Hunger Act of 2019 proposes expanding CalFresh eligibility to students who (1) work a minimum of 10 hours per week during school (2) are eligible for a Federal Pell Grant, (3) have a \$0 EFC, or (4) are independent.
- 7 Unrath, M (2021) Pushed out by paperwork: Why eligible Californians leave CalFresh.
- 8 California. Governor's Office. 2021-22 State Budget.

APPENDIX

Figure 1. Student eligibility criteria for CalFresh (see next page for figure notes)



The Food and Agriculture Act of 1977 and the Agricultural Act of 2014 exclude students from participating in the Supplemental Nutrition Assistance Program (SNAP, implemented as CalFresh in California) unless they meet certain allowable 'exemptions' to the student eligibility rule.

Figure I illustrates the eligibility criteria that college students in California must meet to qualify for CalFresh and be 'exempt' from this student eligibility rule. When an individual applies to CalFresh and is assessed by a county eligibility worker, in addition to being required to meet income limits based on household size, citizenship and other basic characteristics, they are assessed against the CalFresh (SNAP) definition of a student. If they are between the ages of 18 to 49, enrolled at least half time and able to attend school, they are determined to be a 'student.' Those individuals who are defined as students must meet additional criteria to avoid being excluded from CalFresh based on their student status. These criteria include demonstrating that they receive a Cal Grant A or B, work a certain number of hours, participate in Work Study, or meet one of the other exemptions as illustrated below.

Figure notes

^ Broad-based Categorical Eligibility (BBCE), known in California as Modified Categorical Eligibility (MCE), allows states to increase the gross income limit for households to below or at 200% of the Federal Poverty Level (FPL). California has implemented this higher limit (California Code, Welfare and Institutions Code WIC § 18901.5, ACL 18-90, ACL 19-44, ACL 13-108, and ACL 13-32) and this applies to the majority of households in California, excluding: individuals disqualified for an intentional program violation or violation of a condition of probation or parole imposed under a Federal or State law, and heads of households non-compliant with work requirements (those who meet the CalFresh student definition are exempt from the work requirement, 7 C.F.R. § 273.7(b)(1)).

^{*} Temporary expansions to CalFresh student eligibility due to the COVID-19 pandemic in 2021 (ACL 21-11).