

CALFRESH FOR COLLEGE STUDENTS:

Equitable and Just Access | March 2022



WHITE PAPER

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OVERVIEW



College students across the country go hungry at an alarming rate. The scale and negative impacts of these difficulties called for the Federal Government Accountability Office to publish an extensive report in 2018, which concluded that nationally, not only are low-income students denied aid that other people receive, but about two million at-risk students who were potentially eligible for food aid through SNAP (Supplemental Nutrition Assistance Program, called CalFresh in California) did not receive the benefit. Hunger, in addition to being a dehumanizing experience and one that causes short and long-term health and mental health consequences, is especially problematic among college students because it has negative impacts on their academic success, rendering them more likely to drop out before graduating and undermining the investments that they and our financial aid programs have made.

This high rate of hunger is a result of the high cost of college, stagnating pell-grants and federal funds for work study, and federal laws which limit access to the country's most important anti-hunger program, SNAP. The SNAP Student Rule dates back to the 1970's from a radically different college environment. This "work for food" policy is underscored by out-dated stereotypes of the "starving college student." Not only do these rules treat students differently than other SNAP applicants, by punishing people for taking steps to exit poverty through education, they **deny the reality of today's low-income students** who are often first generation, from disenfranchised communities, and overcome significant barriers as they seek to complete their degree.

The **EATS Act (H.R. 1919/S. 2515)** by Rep. Jimmy Gomez (D-CA) and Sen. Kirsten Gillibrand (D-NY) would permanently expand SNAP access to low-income college students, addressing this significant inequity in food access, and remove the complex and burdensome rules for county and state administrators. That is why our organizations and dozens throughout the state and country have endorsed this reform and are calling on it to be passed by Congress as a stand alone bill or to be included in the next Farm Bill.

While activists, organizers and policymakers are working to address these issues at the federal level, there are still many steps a state can take to dramatically reduce college hunger. **This paper details what steps California has taken and those we have yet to achieve.**

STATE OF THE STATE

College hunger in California has worsened in recent years.

California is no exception when it comes to college student hunger, which is further impacted by the state's high cost of living and limited access to affordable housing for all residents, but especially for college students. The [Legislative Analyst's Office \(LAO\)](#) reports that a staggering **44% of undergraduates and 26% of graduate students** in California experience food insecurity.

The latest ["completion" data from the University of California Undergraduate Experience Survey](#) confirms that students who experience food and/or housing challenges have lower GPAs and graduation rates compared to students who have their basic needs met. GPA and graduation gaps are larger for students with intersectional identities across first-generation, LGBT+, underrepresented ethnic minorities/minoritized (UREM), and community college transfers. The latest [data from the California Policy Lab](#) shows that only **10% of Community College students, 12% of UC undergraduate students, and 4% of UC graduate students** were enrolled in CalFresh through the 2019-2020 academic year.

Compounding this already problematic reality is that COVID-19 has [worsened hunger among higher education students](#), with nearly **1 in 4 students** becoming less food secure, on top of existing food insecurity, with deep disparities for UREM students. From the high school graduating class of 2021, who have already lost so much and will face great uncertainty as they enter college, to college students hoping to graduate this spring in [an economy that has been shaken to the bone](#), our country's college students are suffering great losses during the COVID-19 pandemic. The setbacks will be even more significant for those students who are low-income and first in their families to attend college.

While the epidemic of college hunger is a black-eye to our state's world-class higher education system, California has also been a vanguard when it comes to talking about the problem and working to address it with a strategy led by low-income college students. Thanks to their movement building, California has established basic needs centers with food pantries and meal sharing programs at many state colleges and is working to improve access to CalFresh. Still, research by the Western Center on Law and Poverty from [2018](#) and [2020](#) demonstrates that many eligible students are denied or cannot access the food aid to which they are entitled. A [recent report from the California Department of Social Services](#) estimates that of the likely CalFresh eligible college student population, only between **18% to 30% of these students** are enrolled. This is a tremendous missed opportunity for students in need that could be receiving vital federal assistance for purchasing food. In addition, every dollar of CalFresh spent [generates as much as \\$1.8 in economic activity](#) during an economic downturn, making it an important program for California's vital food economy.



Federal SNAP laws limit the reach of CalFresh's anti-hunger help for students.

One of the reasons that low-income students, like those identified in the studies referenced above, are experiencing hunger is that **federal food assistance available to most low-income Californians is made more difficult to secure as a result of federal law.**

Federal law denies eligibility to college students unless they are working 20 hours a week or more or are eligible for one of the exemptions to the rule as listed below. A student is subject to this rule if they are aged 18-49, enrolled at least half-time or more, as defined by the school in an institute of "higher education" and enrolled in a "regular curriculum."¹ A student is exempt from the rule if they are:

- » Eligible for and anticipate working at a state or federal work-study job. The exemption begins the month the school term starts or the month work study is approved, whichever is later, and continues until the end of the month the school term ends.²
- » A full-time student with a child under age 12, or part-time student with a child under age six or a child between ages six and 12 for whom adequate care is not available.
- » Receiving a Temporary Aid to Needy Families (TANF) funded benefit.
- » Enrolled in a food stamp employment and training (FSET) program, or other state or local job training programs, as identified by the state and approved by the USDA.³
- » Not intending to register for the next normal school term.⁴

If a student fails to qualify for an exemption to the student rule and is not working an average of 20 hours per week or more, **the student is ineligible and neither their income nor needs are considered in determining assistance for the household.** If they live in a household with other CalFresh eligible people, those people will receive aid, but aid for the non-exempt college student will not be included. Additionally, not only are students required to work or meet an exemption (despite the fact California has an ABAWD (Able-Bodied Adult Without Dependent) waiver exemption that unfortunately does not cover students), but students face further barriers if they have a meal plan (which most freshmen at four-year universities are required to have if they live on-campus) and if they are under 22 and live with their parents.



COVID-19 provisions have temporarily improved student access to CalFresh.

In the [Consolidated Appropriations Act \(CAA\) of 2021](#), Congress expanded SNAP to students who are either eligible for federal or state work study, or have a \$0 Expected Family Contribution. This has allowed many more students to access SNAP. This immense increase in applications submitted by college students due to expanding SNAP eligibility can be shown by data collected by the Center for Healthy Communities at Chico State (CHC) as part of their statewide CalFresh Outreach Higher Ed Contract. CHC saw a **306% increase** in applications submitted by their 40 college campus subcontractors in federal fiscal year 2021, Q4 and a **237% increase** in federal fiscal year 2022, Q1. However, this expansion is still limited as it requires students to complete the Free Application for Federal Student Aid (FAFSA), a known barrier for low-income students. Additionally, the expansion is temporary: it will sunset one month following the end of the federal Public Health Emergency, threatening a serious hunger cliff for students who will be terminated from aid unless they can demonstrate eligibility for an underlying exemption. The CAA expansions have been significant, and point to the **need for a permanent legislative fix** to improve college student CalFresh access. Since January 2021, some 150,000 college students have applied for CalFresh.

CALIFORNIA'S LEADERSHIP

In the face of low participation rates & systemic challenges, the CA legislature has led the nation in seeking solutions.

In 2014, the California state legislature passed, and Governor Brown signed, the first state-level legislation to address the College Student Hunger epidemic: [Assembly Bill 1930 \(Skinner\)](#). The enactment of the bill established a workgroup to identify policies that would increase access to CalFresh food assistance for eligible college students. Since the enactment of AB 1930, the state has adopted several of the workgroup's recommendations, but some of these recommendations remain only sub-regulatory guidance and have not been statutorily mandated. What's more, a lack of data about the CalFresh student population, a lack of funding for counties to do the additional work necessary to implement the discriminatory federal law and lack of support for outreach and application assistance for the program has limited the potential for success of these regulations.

In 2017, Assembly Member Monique Limón introduced [Assembly Bill 453](#), which would have established the Hunger Free Campus Initiative. This bill was not passed, because it was, instead, passed in the [Budget Act of 2017](#), with an appropriation of \$2.5 Million. **The Hunger Free Campus initiative gives awards to public colleges that achieve the following objectives:**

- » First, the CSUs and the UCs (but not the Community Colleges) must establish a "meal sharing" program. This vision was based off of a model established by [Swipe Out Hunger](#) to reduce hunger on campus by activating college students to donate unused meal points to feed their peers and community members. The Hunger Free Campus initiative includes requirements to be designated a "Hunger Free Campus," that a campus establish a Swipe Out Hunger program, or similar meal sharing program, and designate a staff on campus to coordinate the program. It also required that the benefits of the program be first distributed for meal plan purchases by students who need them and then, remaining benefits to be donated to the on-campus food pantry.

- » The **Hunger Free Campus** initiative ensures that college students will benefit from these new rules by increasing awareness of CalFresh on campus. It does so by requiring colleges funded through the program to make materials available on campus and designate a campus employee to serve as a point person for students, for the county and for community outreach providers.
- » The **Center for Healthy Communities** at Chico State (CHC), a CDSS prime contractor, funds 50 college campuses currently in 2022 across California to build their own CalFresh Outreach (CFO) Programs to promote and provide CalFresh application assistance to students. In 2021, the CHC CFO Program estimated that more than \$35 million in CalFresh dollars went into the pockets of college students across their college campus subcontractors. Additionally, CHC built the CalFresh Outreach Resource Hub, which is available to all California college campus staff providing CalFresh application assistance. The CFO Hub has a collection of webinars, trainings, Campus Handbook, toolkits, and even a live support desk to answer CalFresh Outreach related questions staff have.
- » Finally, because college students often have limited transportation options and community-based food resources are typically not located close to campuses or, though food insecure, might not meet community-based agency requirements of off-campus services, the **Hunger Free Campus** initiative requires campus-based food pantries to be made easily accessible and navigable.

The **Budget Act of 2020** included funding for the California Department of Social Services (CDSS) and all three public higher education segments to increase and improve CalFresh efforts for college students through the COVID-19 pandemic. Unique state funding was also provided to the Center for Healthy Communities (CHC) at Chico State to build the CalFresh Outreach Resource Hub and provide technical coordination and support to all public college and universities in California. This state funding ensured CHC could support and provide training and tools to increase college student CalFresh applications at all public colleges and universities, in addition to their 40 college subcontractors on their federally funded 2018-2021 CalFresh Outreach Higher Ed Contract.

In the **Budget Act of 2021**, the state budget funded the establishment of a basic needs center at public colleges across the state, a campaign that was years in the making and included legislation introduced by Assembly Member Berman. These basic needs centers offer a place for students to get help to address hunger and homelessness, including application assistance for CalFresh.

In 2021, California passed **AB 1326 (Arambula)**, which requires county human service agencies to designate at least one employee as a staff liaison to serve as a point of contact for colleges and universities within that county. The hope is that by having a county staff member who is well versed in SNAP eligibility rules for college students, counties will be able to better serve this unique population and ensure that as many students as possible who are eligible for the program receive benefits.

By the end of 2021, California passed **ongoing funding for all three public segments** to improve student basic needs, with specific language for CalFresh to be a priority for the investment and impact of this funding.

In 2022, CalSAWS, which is responsible for the development of public benefits technology for counties, received funding from the American Rescue Plan Act (ARPA) to enhance the BenefitsCal public benefits website to create a **Student Based Application** flow, complete CBO journey mapping, implement the integrated Release of Information component, design referral URL code functionality, and produce a communication & marketing campaign. These features are imperative for student consumers seeking services and the CBOs that support them.

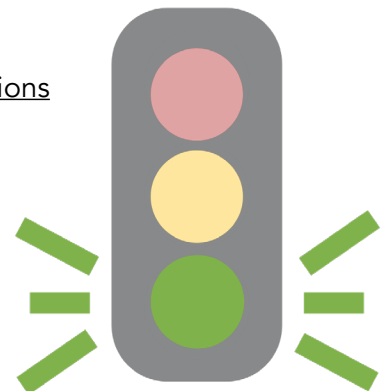
WHAT'S NEXT

We must continue to remove barriers to college students seeking CalFresh.

California has much to be proud of when it comes to improving college student access to CalFresh. Over the last 12 years, California has successfully established itself as a national model for college student basic needs, anti-hunger/food justice, and CalFresh/SNAP. Below are specific ways that students in need, counties, and our state will sustain our momentum. By completing the items below we will: (i) improve student experiences and outcomes, (ii) improve county and state administrative processes, and (iii) improve our local and state economies:

- » **Codify** the regulations issued by the Department of Social Services (DSS) at the recommendation of the workgroup established by AB 1930 (Skinner, 2014) which sought to make CalFresh benefits more accessible to eligible college students.
- » **Ensure** that state legislation and financial investments are having their intended impact by having timely data on key metrics related to college student enrollment trends in CalFresh. These will help us track progress, amplify effective practices, identify opportunities for improvement, and support the successful scaling of enrollment of college students across all segments.
- » **Provide** adequate ongoing state funding for the state and counties' administration of CalFresh in light of increased caseload due to caseload expansion, including among college students across California.
- » **Improve** access for students at community colleges and all local programs that improve employability.
- » **Create** a CalFresh student data dashboard that allows policy and outreach professionals, as well as college higher educational leaders, to track CalFresh eligibility and access trends across counties, institutions and sectors.

This year, Senator Skinner has introduced **SB 641**, which would accomplish some of these policy goals. Our coalition of 47 organizations are in support and calling for its passage and signature. We are also calling on state budget investments to build more transparency and knowledge about CalFresh college student participation.



1. 7 C.F.R. § 273.5(a); MPP §§ 63-406.1 and .21.

2. MPP § 63-406.212

3. 7 C.F.R. § 273.5(b)(11).

4. 7 C.F.R. § 273.5(c). See ACIN I-36-12 for treatment of applicants declaring intent to not reenroll.

SUMMARY

The Federal EATS Act needs to be passed.

The **Federal EATS Act (H.R. 1919/S. 2515)** would permanently expand SNAP access to low-income college students, addressing this significant inequity in food access, and remove the complex and burdensome rules for county and state administrators. Until it is, we should continue our work in California to maximize Calfresh enrollment among eligible students. For more resources on this topic, please see:

[California Association of Food Banks](#)

[California Community Colleges Health and Wellness](#)

[California Higher Education Basic Needs Alliance \(CHEBNA\)](#)

[Center for Healthy Communities, California State University, Chico](#)

[Food Research & Action Center](#)

[Student and Equity Affairs, Office of the President, University of California](#)

[The Basic Needs Center, University of California, Berkeley](#)

