

Senate Bill 77

CalFresh Student Data Report



California Department of Social Services
Kim Johnson, Director

JUNE 2020

Senate Bill 77 CalFresh Student Data Report

Executive Summary

Per Senate Bill (SB) 77 (Committee on Budget and Fiscal Review, Statutes of 2019, Chapter 53), the California Department of Social Services (CDSS), CalFresh and Nutrition Branch, convened the CalFresh Student Data Workgroup (SB 77 workgroup) in order to compile statewide data on college student participation in CalFresh and to provide recommendations for improving CalFresh access among college students. Workgroup membership included representatives of the three segments of California public higher education (the University of California (UC) system, the California State University (CSU) system, and the California Community Colleges (CCC) system), representatives of county Human Service Agencies, and food security advocates. Based on the input of the SB 77 workgroup members, this report provides analysis and discussion of available data, and makes five recommendations for improving CalFresh access among public postsecondary students in the state.

It should be noted that CDSS served as a facilitator of the process, not a workgroup participant, and the recommendations in this report do not reflect the opinions of CDSS or the Administration.

Available Data

Overall, the SB 77 workgroup sought to establish an estimate of the number of college students across California likely eligible for CalFresh based on whether or not the students met the criteria for an exemption from the federally established Supplemental Nutrition Assistance Program (SNAP) student eligibility rule.

It quickly became apparent that the complexity of the student eligibility rule and exemptions from the rule, coupled with data limitations, make it difficult to arrive at this estimate at the statewide level. Limited information is available to determine whether a student may be subject to or exempt from the student eligibility rule. For example, the number of students working 20 hours per week is not tracked statewide or by individual campuses. An unknown number of college students may be employed while in school and therefore exempt from the student eligibility rule. Because the number is unknown, a group of potentially CalFresh eligible students may not be captured in the available data. In addition, data provided by public postsecondary segments (i.e. the UCs, CSUs, and CCCs) is duplicative with regards to the reported number of students who may meet the criteria for an exemption. That is, it is highly probable that an individual student may be reported in more than one exemption category simultaneously.

Despite these limitations, the SB 77 workgroup was able to acquire data from two important sources: (1) the CalFresh eligibility system known as the Statewide Automated Welfare Systems (SAWS), which provided data on students currently participating in CalFresh, and (2) the three public postsecondary educational segments,

which provided data on enrolled students that are reported to meet the criteria for an exemption from the student eligibility rule. Based on the available data, the SB 77 workgroup was able to identify:

- The annualized average number of students receiving CalFresh food benefits to be **127,360**, and
- the total number of students likely eligible for CalFresh statewide to be between **416,471** and **689,233**.

Each of these counts of students were for the 2018-19 academic school year (July 2018 through June 2019).

Recommendations

The SB 77 workgroup members identified five key areas in which systematic efforts, if made, could improve CalFresh access among eligible college students. The five key areas are related to partnerships, targeted outreach, data and technology, processes, and policy change. Recommendations specific to each identified area are listed in detail in the full report below.

Introduction

CalFresh, federally known as SNAP, is a primary defense against food insecurity in the state of California. CalFresh provides eligible individuals and families with low incomes with monthly food benefits. Benefits are loaded onto an Electronic Benefit Transfer (EBT) card that clients use to purchase food items.

The Higher Education Trailer Bill (SB 77), passed on July 1, 2019, requires the CDSS, in consultation with the UC, the CSU, and the CCC, to assess the effectiveness of CalFresh in addressing student food insecurity at the public postsecondary segments, and to submit a report to the Department of Finance and relevant policy and fiscal committees of the Legislature on public postsecondary student participation in CalFresh. This report contains the following components, as required by SB 77:

- a list of the findings and recommendations from the Student Eligibility Workgroup (student workgroup) meetings organized pursuant to Section 18928 of the Welfare and Institutions Code,
- an estimate of the number of public postsecondary students who are eligible to receive CalFresh benefits,
- the number of those students who are also receiving CalFresh benefits, and
- recommendations on how best to reach eligible students who are not currently receiving those benefits so that they may receive those benefits.

Background

Federal Student Eligibility Rule

Federal SNAP rules provide the definition of a student for the purpose of administering CalFresh and list exemptions that make a student eligible to participate in CalFresh, if they otherwise qualify. A student, under these rules, is defined as any person age 18 through 49 years old who is physically and mentally fit for employment and enrolled at least half-time in an institution of higher education.¹ Students are ineligible to participate in CalFresh unless they meet at least one of the available exemptions.² This is known as the “student eligibility rule.”³

Exemptions from the student eligibility rule are as follows:

- Employed and paid to work an average of 20 hours a week or a total of 80 hours per month
- Not expected to be enrolled next term
- Has a disability

¹ [7 Code of Federal Regulations \(CFR\) Section 63-406.11](#) and [Manual of Policies and Procedures \(MPP\) Section 63-406.11](#).

² [7 CFR Section 273.5\(b\)](#).

³ California Department of Social Services. [All County Letter 20-08--CalFresh Student Eligibility Handbook](#). Available at [CDSS Website](https://www.cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACLs/2020/20-08.pdf) (<https://www.cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACLs/2020/20-08.pdf>)

- Unable to work because of a physical or mental issue
- Approved for Work Study
- A parent of a child under age 12 (this has additional qualifying factors)
- Attending school as part of an employment and training program
- Participating in a program to increase employability
- In receipt of a Temporary Assistance for Needy Families (TANF)-funded benefit, known as CalWORKs in California

Student Eligibility Workgroup

Pursuant to Section 18928 of the Welfare and Institutions Code, the CDSS meets with stakeholders on a quarterly basis to improve coordination between the public postsecondary education segments and CalFresh administering agencies with the goal of improving CalFresh access among college students. The group, known as the student workgroup, started meeting in 2014 and includes representatives of the three segments of California public postsecondary education, representatives of the county Human Service Agencies, CalFresh Outreach contracted partners, food security advocates, other stakeholders, and the CDSS.

Since its inception, the student workgroup successfully assisted the CDSS in releasing All County Letter [\(ACL\) No. 15-70](#), [ACL No. 17-05⁴](#), [ACL No. 17-05E⁵](#), [ACL No. 18-27⁶](#), [ACL No. 19-32⁷](#) and [All County Information Notice \(ACIN\) I-89-15⁸](#) to provide guidance to county Human Service Agencies on accurate assessment of student eligibility for CalFresh. Additionally, the CalFresh Student Eligibility Handbook was released ([ACL No. 20-08](#)) in February 2020. The Handbook is a compendium of previously issued guidance and provides a clear and concise reference tool for administrators and stakeholders alike.

⁴California Department of Social Services. [All County Letter 17-05--CalFresh Student Eligibility](#). Available at [CDSS Website](#) (<https://www.cdss.ca.gov/inforesources/2017-all-county-letters>)

⁵ California Department of Social Services. [All County Letter 17-05E--CalFresh Student Eligibility Errata](#). Available at [CDSS Website](#) (<https://www.cdss.ca.gov/inforesources/2017-all-county-letters>)

⁶ California Department of Social Services. [All County Letter 18-27--CalFresh Student Eligibility: Implementation Of Assembly Bill \(AB\) 214](#). Available at [CDSS Website](#) (<https://www.cdss.ca.gov/inforesources/2018-all-county-letters>)

⁷ California Department of Social Services. [All County Letter 19-32-- CalFresh Student Eligibility: Clarification Regarding Cal Grants For Community College Students](#). Available at [CDSS Website](#) (<https://www.cdss.ca.gov/inforesources/2019-all-county-letters>)

⁸ California Department of Social Services. [All County Information Notice 89-15-- CalFresh Program: Student Eligibility](#). Available at [CDSS Website](#) (<https://www.cdss.ca.gov/inforesources/letters-regulations/letters-and-notices/all-county-information-notices/2015-all-county-information-notices>).

SB 77 Workgroup Membership

The CDSS invited members of the student workgroup to participate in the SB 77 workgroup. The SB 77 workgroup members then referred additional colleagues from their respective public postsecondary segments such as researchers and financial aid leaders to participate.

Members of the SB 77 workgroup included representatives from the following organizations:

- California Community Colleges Chancellor's Office
- California Higher Education Basic Needs Alliance
- California State University Office of the Chancellor
- California State University, Chico
- Center for Healthy Communities at California State University, Chico
- Coalition for California Welfare Rights Organizations (CCWRO)
- Code for America
- The Institute for College Access and Success (TICAS)
- University of California Office of the President
- University of California, Berkeley
- University of California, Davis
- University of California, San Francisco
- University of California, Santa Cruz
- Western Center on Law and Poverty
- Yolo County Health and Human Services

Current Reach of CalFresh to College Students

Current Student Enrollment in CalFresh

The CDSS obtained data from the SAWS on the number of students participating in CalFresh. The data was requested through a SAWS Internal Request for Research and Analysis (SIRFRA). For the purpose of this report, the CDSS requested data on the number of CalFresh recipients identified as college students under the CalFresh definition of a student between July 1, 2018 and June 30, 2019. This time period was chosen to align with the 2018-19 academic term. The SAWS do not track the education institutions students are enrolled in; therefore, the SAWS data could not be disaggregated by segment (UC, CSU, or CCC).

The SAWS data show that during the 2018-19 school year, there were **127,360** students statewide who received CalFresh benefits. It is important to note that this reported count of students underestimates the actual number of students enrolled in CalFresh during the full academic year. This is because SAWS may not include

students who applied between school terms (during summer or winter break) or students who were currently attending school but did not expect to enroll in the next term (such as, students expecting to graduate at the end of the term).

The CDSS was unable to obtain data from the SAWS on the number of students participating in CalFresh by exemption category. Such data is not available in a way that would make meaningful analysis possible.

Current Estimates of Likely CalFresh Eligible Students

The UC Office of the President, the CSU Chancellor's Office, the CCC Chancellor's Office, and the California Student Aid Commission (CSAC) contributed pertinent data for inclusion in this report.

The SB 77 workgroup members identified two ways to estimate the number of public postsecondary students likely eligible for CalFresh:

- the number of students meeting the criteria for an exemption from the student eligibility rule and
- the number of students in receipt of a Pell Grant (an indicator of income under the CalFresh income eligibility threshold).

Both have limitations, but when considered together can provide a range wherein the actual number of likely eligible students lies.

Estimated Number of Students Meeting the Criteria for an Exemption

Students with less than half-time enrollment and students who are age 17 and under or 50 and older are not subject to the CalFresh student eligibility rule. The data provided first filtered for half-time enrollment status and age. The UCs and the CSUs were able to filter data for students enrolled half-time or more and age 18 to 49 (note that the UC and CSU exemption counts only reflect undergraduate students). The CCCs were unable to apply the same filtering method, therefore the data provided by the CCCs includes all students regardless of their half-time or full-time status or their age.

The data provided was then filtered according to whether there was any information known about whether these students met the criteria for an exemption. The UCs, CSUs and CCCs provided data regarding participation in a program to increase employability and receipt of a TANF funded benefit. In addition, the UCs and CSUs provided data regarding approval for work study and the UCs and CCCs provided data regarding the number of students who reported being a person with a disability.

As previously mentioned, it is possible that a student may be captured within multiple exemption categories simultaneously, thus inflating the count of students meeting the criteria for the exemption categories reported. For example, a student may receive Cal Grant A or B and be participating in an EOP/EOPS program. The data reported for each exemption category comes from different systems and cannot be analyzed in an unduplicated manner.

While duplication may result in an overestimate of the total number of students meeting the criteria for an exemption in the categories included in this report, because there is no data available for many other exemption categories, this overestimate is somewhat offset by the underestimate in other categories. For example, information is not

available on the number of hours worked by students each week. Exemption categories excluded from this report is listed in the [Unavailable Exemption Data](#) section below.

Figure A provides an overview of the total number of students likely meeting the criteria for at least one exemption from the CalFresh student eligibility rule by public postsecondary education segment. There was a total of **416,471** such students.

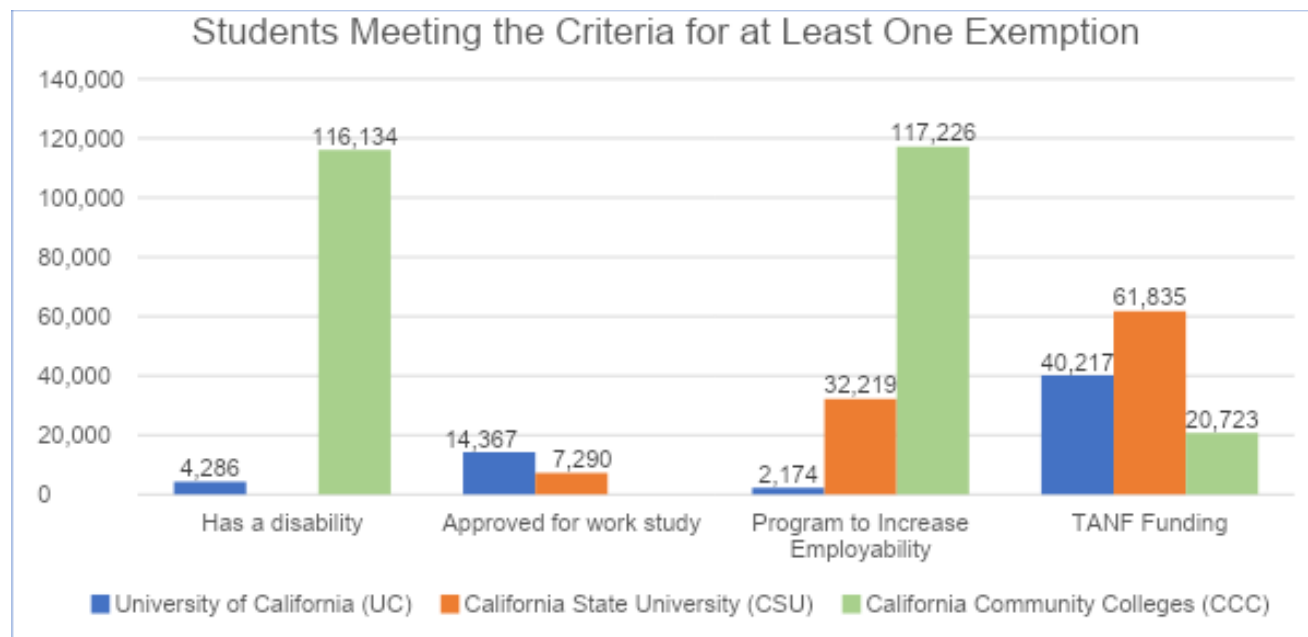


Figure A: Students Meeting at Least One Exemption from the CalFresh Student Eligibility Rule

Limitations of Available Exemption Data

The count of students meeting the criteria for an exemption in the exemption categories reported above are not without limitations:

- Has a Disability:** The counts of student with a disability reported by the UCs and CCCs represent only students participating in the Disabled Students Program and Services (DSPS). The CSUs do not have DSPS, but they do provide various services for disabled students that are not tracked statewide. Therefore, there is no available count of students enrolled in CSUs for this exemption. It is likely that a number of students are living with a verifiable disability yet not participating in disabled student services at their school; such students would potentially meet the criteria for an exemption but are not tracked by any institution.
- Approved for Work Study:** Students meet the criteria for an exemption if they are approved for state or federal Work Study and can reasonably anticipate accepting a work study position if offered. The UCs were able to provide the number of students who meet the criteria for the Work Study exemption. The CSUs provided the number of those students placed in work study positions.

This number excludes those students approved, who do not receive a placement, but still meet the criteria for the Work Study exemption. The CCCs did not have Work Study data at the statewide level.

- **Programs to Increase Employability:** There are a number of Programs to Increase Employability statewide; participation in any of these programs would allow a student to meet the criteria for an exemption. The majority of these programs do not report participation statewide and so their participation counts are not captured in the data reported above. At the statewide level, the UCs only track two programs: Mathematics Engineering Science Achievement (MESA) and Chafee Educational Training Voucher (ETV) Programs. The CSUs only track Educational Opportunity Program (EOP). The CCCs track five programs: Extended Opportunity Programs and Services (EOPS), Cooperative Agencies Resources for Education, MESA, ETV, and Cooperating Agencies Foster Youth Educational Support Programs. Tracked program participation has been combined for each of the segments in the above table.
- **TANF Funding:** This category includes both TANF-funded Cal Grants and receipt of CalWORKs. The CCC count includes students in receipt of CalWORKs. The CCC students are not eligible for TANF-funded Cal Grants. The UC and CSU counts include TANF-funded Cal Grants, but do not include students in receipt of CalWORKs.

Unavailable Exemption Data

There are several exemptions from the student eligibility rule for which no data are available. That said, it is possible that some of these exemption categories may be tracked at the individual campus level. Exemptions for which no data are available at the state system-level are as follows:

- **Employed and paid at least 20 hours per week or a total of 80 hours per month:** Employment off-campus is not tracked at the campus level or the statewide-level by any segment. That said, some campuses may track on-campus employment. However, many campuses also limit on-campus employment of students to a maximum of 19 hours per week so as not to interfere with their academic success.
- **Attending school as part of an Employment and Training (E&T) Program:** Currently, only CCCs have E&T Programs, but a majority of campuses will not be able to provide participation data unless the institution has a memorandum of understanding with the county administering CalFresh E&T.
- **Have a child under 12:** Parental status and information about a student's children are not tracked at the statewide level. It may be tracked at some campuses. However, whether the student is solely responsible for the care of a child (the primary indicator for this exemption) would certainly not be tracked. Parents may have a child under 12 and not qualify for this exemption to the student eligibility rule.

- **Have a doctor's note stating they are unable to work due to a physical or mental issue:** This exemption is not tracked either at system-level or individual campus level.

Alternative Indicator of Eligibility

In addition to the categories listed above that allow a student to meet the criteria for an exemption from the student eligibility rule, receipt of a Pell Grant provides an additional way to identify students with low-income. Although receipt of a Pell Grant does not meet the criteria for an exemption from the student eligibility rule, it does provide an estimate of the number of students from households with low-income who may benefit from receiving CalFresh benefits while in school.

The total number of students receiving a Pell Grant would be an overestimate of likely CalFresh eligible students because it does not take into consideration whether the student meets the criteria for an exemption from the student eligibility rule.

If the count of students meeting the criteria for an exemption reported above (416,471) is an underestimate of the total count of students likely CalFresh eligible, one could expect that the true estimate of likely CalFresh eligible students may exist somewhere between the total number of students meeting the criteria for at least one exemption from the student eligibility rule and the total number of students receiving a Pell Grant.

Current data show there are approximately **689,233** students who received Pell Grants statewide (81,003 students in the UCs, 180,635 in the CSUs, and 427,595 in the CCCs).

Figure B is a graphical representation of the range of likely CalFresh eligible students with the lower limit being the count of students meeting the criteria for an exemption and the upper limit being the total count of Pell Grant recipients. Figure C shows the range of likely CalFresh eligible students by the three public postsecondary educational segments in California.

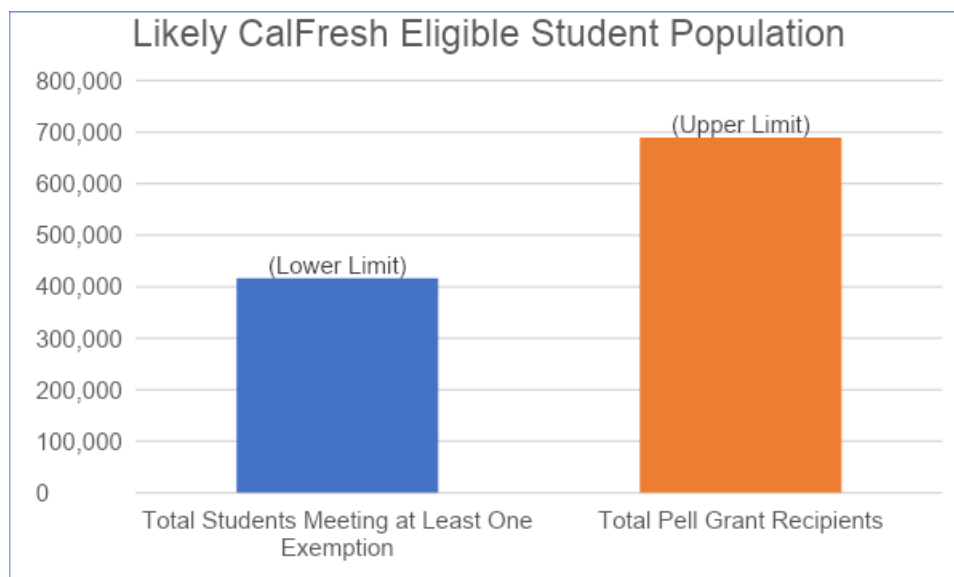


Figure B: Range of Likely CalFresh Eligible Student Population Statewide

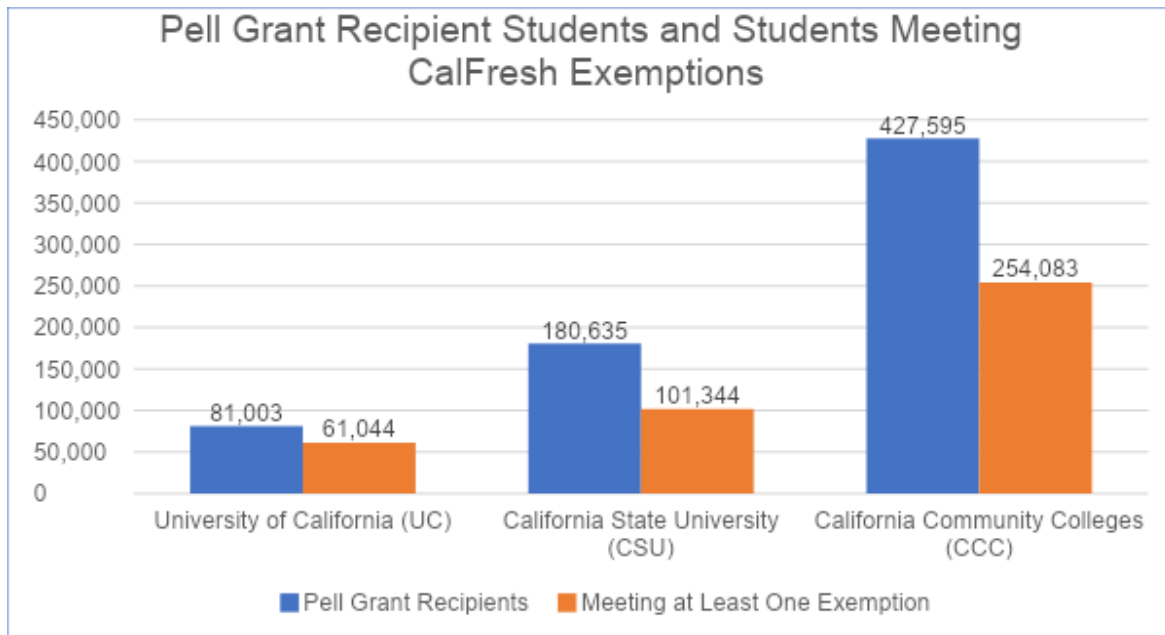


Figure C: Pell Grant Recipient Students and Students Meeting an Exemption in Public Postsecondary Segments

The Assistance Gap

With the limited data available, the SB 77 workgroup members estimate that the gap between those students likely CalFresh eligible and those participating in CalFresh falls somewhere between **289,111 and 561,873 students**. The recommendations identified by workgroup members and listed below focus on narrowing this gap.

Existing Efforts to Improve Access to CalFresh

In addition to the policy efforts undertaken by the student workgroup, student outreach efforts have significantly increased over the past three years. For example, Code for America created the [GetCalFresh.org/Students](https://getcalfresh.org/students) portal in 2017 to improve the user experience for college students applying for CalFresh directly from their phone. CSU Chico's Center for Healthy Communities has worked with campuses throughout California to increase the number of students participating in CalFresh. In Federal Fiscal Year 2019, CSU Chico's Center for Healthy Communities expanded their network significantly from 11 subcontractors to a total of 41 subcontractors to meet students where they are, address students' food insecurity, and provide students with better access to CalFresh food benefits.

The California public postsecondary segments have done considerable work on adopting hunger free campus initiatives. The UC, CSU, and CCC campuses have been utilizing Hunger-Free Campus funding to reduce food insecurity among vulnerable student populations through efforts such as delivering meal plans, hosting food pantries and regular food distributions on campus, expanding on-campus efforts to increase

student enrollment in CalFresh, strengthening infrastructure, hiring temporary staffing, and continuing to build strategic partnerships with community and statewide partners and between campuses.^{9, 10, & 11}

Recommendations

Recommendations in five areas were identified by the SB 77 workgroup members in which systematic efforts, if made, could improve CalFresh participation among students in public postsecondary institutions statewide. The five areas are: partnerships, targeted outreach, data and technology, processes, and policy change. It is also worth noting that the SB 77 workgroup members did not analyze the impact of recommendations on administrative costs or operational practices at the program, college, institutional, county, or departmental levels.

Grow Partnerships

The following recommendations encourage the continued collaboration of the CDSS, the three public postsecondary segments, county Health and Human Service Agencies, and food security advocates to increase the number of eligible students participating in CalFresh.

- Increase collaboration between student assistance programs enabling cross referrals between different programs such as CalFresh, food pantries, and homeless student assistance.
- Invest in Basic Needs Centers on campuses that integrate food-related programs with other programs such as housing and homelessness services to address student basic needs in a comprehensive way.
- Partner and bolster training programs that increase employability for college students. This improves both student career prospects and serves as an exemption to the student eligibility rule for CalFresh.

Support Targeted Outreach

To increase the number of eligible students enrolled in CalFresh, stakeholders should collaborate to support targeted CalFresh outreach and develop integrated messaging to address food insecurity effectively among eligible students.

⁹ University of California Office of the President. *University of California Hunger-Free Campus Report* (February 2019). Available at [UCOP Website](https://www.ucop.edu/operating-budget/_files/legreports/18-19/hunger-free_campus_legrpt-2-13-19.pdf) (https://www.ucop.edu/operating-budget/_files/legreports/18-19/hunger-free_campus_legrpt-2-13-19.pdf)

¹⁰ California State University. *Hunger Free Campus Designation* (Accessed 2/4/2020). Available at [Calstate Webpage](https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Pages/hunger-free-campus-designation.aspx) (https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Pages/hunger-free-campus-designation.aspx)

¹¹ California Community Colleges Chancellor's Office (September 2017). *2017-18 Hunger Free Campus Support Allocations*. Available at [MTSAC webpage](https://www.mtsac.edu/president/cabinet-notes/2017-18/2017-18_Hunger_Free_Campus_Support_Allocations.pdf) (https://www.mtsac.edu/president/cabinet-notes/2017-18/2017-18_Hunger_Free_Campus_Support_Allocations.pdf)

- Target outreach to groups based on income, approval for Work Study, or participation in a program to increase employability. For example, partner with CSAC to conduct targeted outreach to students with low income based on the Free Application for Federal Student Aid information.
- Encourage county Human Service Agencies and schools to explore the efficacy of having a CalFresh eligibility worker stationed on-campus so the entire application and approval process can be completed more conveniently for students by agency staff members experienced with student CalFresh rules.

Leverage Data and Technology

There are significant limitations regarding available data and inconsistencies across segments. To enhance targeted outreach, the feasibility, costs, and benefits of the following should be explored.

- Explore implementing data sharing agreements between programs and institutions to enable targeted outreach to likely CalFresh eligible students.
- Improve statewide tracking of all available exemptions to the CalFresh student eligibility rule in order to better estimate the number of potentially eligible individuals as well as conduct targeted outreach to those individuals.
- Utilize campus electronic student portals that students are already using for CalFresh outreach (such as Blackboard and financial aid pages).
- Build CalFresh eligibility prescreens into campus systems (such as financial aid offices, academic or wellness counseling intakes, health center intakes, Educational Opportunity Program (EOP) or Mathematics Engineering Science Achievement (MESA) program applications, pantry sign-ins, etc.) to enable effective cross referrals.
- Increase text messaging and email follow-up from county Human Service Agencies to encourage students to complete the application process. Over 99% of students applying online through GetCalFresh.org opt in to receiving electronic messages about their CalFresh application, according to Code for America.

Streamline Processes

Students already provide a lot of information and complete many forms as part of the process of applying for and enrolling in school, financial aid, and related programs. Streamlining the CalFresh application process may improve participation among CalFresh eligible students.

- Continue to develop documents that can be used by students and administrators alike as clear verification that a student meets the criteria for an exemption from the student eligibility rule (such as the CSAC letter verifying receipt of a TANF-funded Cal Grant).
- Adopt a statewide, streamlined approach for clearly identifying which meal plans cover less than half of a student's meals. Students in receipt of a meal plan

covering more than half of their meals are ineligible for CalFresh. However, information from meal plan vendors about meal plan pricing tiers are not geared towards determining CalFresh eligibility.

Support Policy Change

The current federal student eligibility rule limits CalFresh participation among students. While effective outreach, collaboration, and simplifying the application process are critical to increasing the number of eligible students enrolled in CalFresh, structurally reforming federal eligibility rules may be required to make more students eligible and to better address student food insecurity on a wider scale.

- Utilize student specific data and other evidence to better communicate the needs of the student population today and the realities of the student experience to inform decision makers about necessary federal law changes to improve SNAP participation.
- Support federal and state legislation that increases access to basic needs for higher education students with low-income.

Other Recommendations

Student food insecurity is a serious hindrance to the success of California students completing their education and becoming self-sufficient, and the issue deserves thoughtful and creative responses such as the following:

- Explore specific strategies for increasing CalFresh enrollment for community college and graduate students. Some exemptions to the student eligibility rule are available only to undergraduate students at 4-year universities (for example, receipt of a TANF-funded Cal Grant). The student workgroup should continue exploring what can be done, within current federal rules, to better identify community college and graduate students who meet the criteria for an exemption.
- Provide funding for a targeted and statewide outreach campaign to more consistently reach likely eligible students across the state. In addition to traditional campaign components such as client friendly materials and paid social media, the outreach campaign could also include funding for county Human Service Agencies working with their local education partners to execute community application sessions on campuses.