



ACCESS TO PROPER NUTRITION EQUALS COLLEGE SUCCESS: MAKING CALFRESH WORK FOR STUDENTS

*CalFresh Workgroup Convened by the
California Student Aid Commission*

Prepared by WestEd on behalf of the California
Student Aid Commission

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Dear Colleagues,

U.S. college students are struggling more than ever to pay for basic needs, including food. Because access to proper nutrition is essential for students to persist and thrive in college, this is an urgent crisis that demands our attention and action. Student hunger is a well-documented problem. For example, at California colleges and universities, one in three college students report that they experience food insecurity, otherwise known as a lack of consistent access to food, in any given month.¹ Meanwhile, financial aid has not kept pace with need. The federal Pell Grant, one of the primary sources of basic living aid for U.S. students, has lost tremendous purchasing power over the years. Whereas in 1980 a Pell Grant covered about 80 percent of a student's college costs, today it covers only about 28 percent.² Such gaps in college affordability have led to chronic student hunger in California and across the country.

This problem has only worsened during the COVID-19 pandemic. Since the pandemic began, students have fallen victim to sudden changes in the economy and loss of jobs. Many college students have chosen to forego a college education because of high living costs and the need to work. According to one study, 34 percent of students know someone who has dropped out of college because of food insecurity during the pandemic.³

The federal government offers the Supplemental Nutrition Assistance Program (SNAP), known as CalFresh in California, and is one of the largest anti-hunger programs in the world. This benefit is available to college students struggling with having consistent access to healthy, nutritional food. However, students have great difficulty accessing these benefits because of numerous hurdles. Only a fraction of California students living in poverty apply for and receive CalFresh benefits.⁴

In the fall of 2020, the California Student Aid Commission convened a statewide workgroup to examine how to increase college students' access to CalFresh benefits. The workgroup took a student-centered approach to understanding how students experience the benefits system and process. This approach offered a comprehensive look at the pain points in the process where onerous requirements can hinder students from accessing benefits promptly, create confusion, or even result in denial of access to this critical support.

The purpose of this report is to offer state and federal policymakers a set of actionable recommendations that help increase college students' participation in the CalFresh program. The recommendations propose short-term and long-term solutions that can be pursued at the state, federal, or administrative policy levels. We all have a role in helping more of our students access the support available to them.

1 California Student Aid Commission (CSAC). (2019). *2018–19 student expenses and resources survey: Initial insights: An initial look at the obstacles students face affording higher education*. https://www.csac.ca.gov/sites/main/files/file-attachments/2018-19_student_expenses_and_resources_survey_web.pdf?1575327209

2 The Institute for College Access & Success. (May 2020). *How to secure and strengthen Pell Grants to increase college access and success* [Fact sheet]. <https://ticas.org/affordability-2/how-secure-and-strengthen-pell-grants-increase-college-access-and-success/>

3 Chegg.org. (2020). *Hunger and COVID-19: Food insecurity amongst US college students in 2020*. <https://www.chegg.org/covid-19-food-insecurity-2020>

4 California Department of Social Services (CDSS). (2020, June). *Senate Bill 77 CalFresh student data report*. <https://www.cdss.ca.gov/Portals/9/Leg/202006-SB-77-CalFresh-Student-Data-Report.pdf>

Expanding access to higher education and closing the persistent opportunity gaps between student populations, often resulting from resource inequities, are both key elements in creating a more inclusive economy in a post-pandemic California. These students are already on a path to acquiring the skills needed to fill emerging jobs in a more automated 21st century workforce. We cannot afford to lose a generation of students because they are struggling with consistent access to healthy nutritional food. These students, if offered food assistance in a timely fashion, will more likely graduate from college, access good jobs, and break the cycle of poverty.

I would like to thank all the participants of the workgroup who represent a broad cross-section of perspectives and experiences. They each contributed invaluable input that helped shape the recommendations proposed in this report. The entire workgroup holds a deep commitment to helping students access these critical nutrition benefits, and this report is one step toward addressing student hunger.

Sincerely,



Marlene L. Garcia, Executive Director
California Student Aid Commission (CSAC)

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EXECUTIVE SUMMARY

Over the last decade, California's postsecondary students have struggled to afford the multitude of expenses associated with pursuing a higher education. This has been particularly true for students from low-income backgrounds, first-generation college-going students, and new immigrants. The issue of college affordability is defined through the costs associated with tuition and supplies, but also with living expenses such as housing and food. Often overlooked, the issue of food insecurity has become a persistent challenge across colleges and universities nationally. In California the challenge is even more acute because of the higher cost of living associated with the state. And the positive outcomes of alleviating food insecurity are well documented—addressing hunger results in improving students' well-being, which in turn supports their academic persistence and completion.

Students' financial challenges have been exacerbated by the COVID-19 pandemic, which has only amplified the issue of postsecondary students' food insecurity. In September 2019, one in three California postsecondary students reported experiencing food insecurity in any given month.⁵ A subsequent survey taken early in the pandemic revealed that 7 in 10 students lost some or all their income because of the pandemic, income that was a key source for providing basic needs such as food.⁶ Increased challenges such as these have led to students dropping out of their postsecondary programs, especially at community colleges. In response to this crisis, the California legislature and governor allocated over \$100 million in emergency aid to support the basic needs of California postsecondary students and an additional \$295 million in one-time funds for emergency financial aid grants

5 CSAC. (2019). *2018–19 student expenses and resources survey: Initial insights: An initial look at the obstacles students face affording higher education*. https://www.csac.ca.gov/sites/main/files/file-attachments/2018-19_student_expenses_and_resources_survey_web.pdf?1575327209

6 CSAC & California Education Lab, UC Davis School of Education. (2020, July). *COVID-19 student survey*. https://www.csac.ca.gov/sites/main/files/file-attachments/2020_covid19_student_survey.pdf

directly to students.⁷ One use of these funds has been to establish food pantries and distribution mechanisms in nearly all colleges and universities in the state to mitigate the growing challenge of student food insecurity. While this measure has helped stem student hunger, one of the most direct ways to address this challenge is through a program already established nationally and in California.

Among California's postsecondary students, it is estimated that between 400,000 and 750,000 are eligible for CalFresh. Yet only 127,000 students receive food benefits through CalFresh.

The federal government provides one of the most expansive anti-hunger programs in the world through the Supplemental Nutrition Assistance Program (SNAP). In California this federal program is executed through the program called CalFresh, which is overseen and regulated by the California Department of Social Services (CDSS). CalFresh is managed and administered by local welfare offices in each of the state's 58 counties. CalFresh is targeted specifically to support populations that do not earn sufficient income to provide for basic nutritional needs. And although this program is available to postsecondary students, only a fraction of potentially eligible students in California receive the benefit currently. Among California's 6.7 million postsecondary students, it is estimated that between 400,000 and 750,000 students are potentially eligible for CalFresh. Yet only approximately 127,000 students receive this food benefit.⁸ For a subset of these students—those who are undocumented—the challenge is more pronounced as they are prohibited from accessing CalFresh and Pell Grants, the most significant form of federal grant aid for students. It is estimated that between 70,000 to 90,000 undocumented students attend a California college or university.

The primary challenge California faces regarding this issue is to provide better and more efficient access to CalFresh benefits for postsecondary students. This is underscored by the fact that California enrolls one of the smallest proportions of eligible low-income potential beneficiaries in the general population (i.e., 54% of low-income residents compared with 73% nationally).⁹ California must grapple

7 The California Budget Act of 2021 allocated \$100 million one-time funds to address basic needs through 2024, \$30 million to support student mental health, \$30 million to establish basic-needs centers on every California community college campus and to hire basic-needs coordinators, \$15 million for California State University to fund the basic-needs component of the Graduation Initiative 2025, approximately \$6 million to support CalFresh outreach, and \$12 million to support increased caseloads at counties (Office of Governor Gavin Newsom. [2021, February 23]. *Governor Newsom signs legislative package providing urgent relief to Californians experiencing pandemic hardship*. <https://www.gov.ca.gov/2021/02/23/governor-newsom-signs-legislative-package-providing-urgent-relief-to-californians-experiencing-pandemic-hardship/>; AB-128 Budget Act of 2021, Regular Session. (Cal., 2021–2022). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=20210220AB128).

8 Note that these data were collected prior to the onset of the pandemic. These figures may have increased since the pandemic began. CDSS. (2020, June). *Senate Bill 77 CalFresh student data report*. <https://www.cdss.ca.gov/Portals/9/Leg/202006-SB-77-CalFresh-Student-Data-Report.pdf>; Granville, P. (2020). *Pathways to simplify and expand SNAP access for California college students*. The Century Foundation. <https://tcf.org/content/report/pathways-simplify-expand-snap-access-california-college-students/>

9 U.S. Department of Agriculture, Food and Nutrition Service. (n.d.). *SNAP participation rates by state, working poor people*. Retrieved September 7, 2021, from <https://www.fns.usda.gov/usamap#>

with the reality that it is home to the highest proportion of U.S. individuals in poverty and to state and local systems that are struggling to keep pace with growing hunger needs.¹⁰

CSAC CalFresh Workgroup Documented Systemic Barriers and Proposes Sustainable Solutions to the Identification, Enrollment, and Administration of Benefits to Postsecondary Students

In September 2020 the California Student Aid Commission (CSAC) convened a diverse workgroup of practitioners, students, state administration staff, county workers, legislative staff, advocates, researchers, and content experts who set out to understand and document the systemic barriers contributing to low student participation rates in the CalFresh program. Building from this understanding, the workgroup advised on the sustainable and actionable policy recommendations for the identification, enrollment, and administration of CalFresh benefits to California's eligible postsecondary students that are included in this report. The workgroup enlisted input from key interested parties—who represented various sectors, including state and county social service agencies, state and local higher education institutions, state and county K–12 education agencies, students, and content experts—to ensure that the resulting system mapping was a true reflection of students' experience trying to access these benefits.

The workgroup's investigation leveraged a user-centered design approach that anchored the assessment of challenges in accessing CalFresh benefits in the experience of students.

When the original SNAP program was established in 1977, the United States did not contemplate the current demographics of students in postsecondary institutions. In fact, the program actively worked to keep postsecondary students out of the program under the broad-based assumption that a student's low-income status was temporary and that familial resources would support their basic needs. Under this assumption, the federal law provided only a few narrow exemptions that permitted student access to food benefits. These exemptions are commonly referred to as the student eligibility rule, which determines a student's ability to access the benefits.¹¹

The workgroup's investigation leveraged a user-centered design approach that anchored the assessment of the challenges in accessing CalFresh benefits in the experience of students. The findings were that it is the benefits system, not any single entity or individual, that has unintentionally created barriers to access for postsecondary students. The system and its barriers are heavily entrenched. This is driven by the program's history, overlapping and paralleled engagement by various state and local government

10 Gorman, A., & Rowan, H. (2018, May 1). Why millions of Californians eligible for food stamps don't get them. *The Salt*. National Public Radio. <https://www.npr.org/sections/thesalt/2018/05/01/606422692/why-millions-of-californians-eligible-for-food-stamps-dont-get-them>

11 U.S. Department of Agriculture, Food and Consumer Service. Students, 7 CFR § 273.5(b) (1992). <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-C/section-273.5>

agencies, and a system that was not meant to address the unique experience of postsecondary students. Further, state and local government agencies are constrained by federal law and regulations that have built-in prescriptive and outdated program requirements that require compliance to established rules, making it difficult to respond to changing student needs. Simply addressing the federal student eligibility rule will not solve the problems the system poses for postsecondary students.

Student Needs Are Differential and Complex in Regard to Accessing CalFresh Benefits

College is a major milestone for many students who leave home for the first time to live on their own. The challenges of this period of transition are exacerbated for students living in poverty or who are undocumented. And, as the demographic of students attending college continues to shift to more students who need supports, there is a growing demand for the CalFresh system to adjust. For example, students who qualified for California's K–12 free and reduced-price meal (FRPM) program or whose family receives CalFresh benefits have no easy way to access a similar benefit when they leave 12th grade or move away from their family. Their benefits under the FRPM are terminated when they graduate from high school, and to receive CalFresh benefits in college, they must apply for them independent of their family.

Undocumented students are prohibited from receiving any federal benefits, including CalFresh and Pell Grants. In California, approximately 50,000 students annually complete a California Dream Act Application that provides access to the state's Cal Grant.¹² This grant covers tuition at 4-year institutions and a \$1,648 nontuition grant for community college students and some 4-year students. However, little or no additional assistance is provided for basic food needs, putting a strain on these students.

These circumstances and the transient nature of postsecondary students create a unique set of challenges that are in addition to an already daunting CalFresh eligibility process. When the workgroup mapped the process for students to access CalFresh benefits, it became evident that students encounter challenges at nearly every step of the process. Although counties have made strides to modernize and create technical pathways to assist students with applications, the workgroup identified several key barriers for students attempting to access CalFresh benefits:

- » **Limited awareness and navigation support:** Though there is funding dedicated to CalFresh outreach for students, there is limited awareness of the CalFresh program. Many students are unaware that CalFresh benefits are available for those struggling with access to food. Even once they learn about the program, they often need someone to walk them through the process of applying for CalFresh, collecting all the required documents and verification, and navigating the system. This need for hands-on assistance is extremely difficult to scale to the need.
- » **Outdated communication tools:** Students struggle to complete the interviews necessary for the application process because of slow mail notification, calls from blocked numbers that students often do not answer, and predesignated interview times that often do not match students'

¹² These data are pre-pandemic for the 2019/20 school year and were reported from the AY 2020 CADAA applications and awards data. Of the 50,000 students who applied, 21,353 were offered Cal Grants.

schedules.¹³ And even when students are approved for the benefit, county social service offices send electronic benefit transfer (EBT) cards and PINs through the postal mail at times that are often not well suited to the start of college classes for students.

- » **Complex processes:** Completing a successful application requires substantial documentation, sometimes lengthy verification processes, and intensive system navigation. Federal processing timeline penalties and a reimbursement system focused only on completed applications create disincentives for county offices to conduct outreach to college students and to sufficiently support the surges of applications at the start of college.¹⁴ Further, students are highly mobile, often have multiple residences across several years, move across county boundaries, and use electronic forms of communication. All of these characteristics stand in contrast to county social service systems designed for processing a different type of CalFresh applicant. They are also notable in terms of the requirements of an interview for applicants, the complex intercounty transfer process, and outdated communication tools that include notification by mail or phone.
- » **Processing delays:** Based on data from the workgroup and student reports, delays and high application denial rates result from federal rules and state funding constraints, causing limited county capacity, challenges in ensuring the availability of staff during high volume seasons, variable experience navigating the student eligibility rule, and the need to manage exceedingly large CalFresh applicant caseloads. The student eligibility rule adds requirements that are in addition to those of the general population. Further, the CalFresh funding methodology for counties creates unhelpful incentives for offices and staff that prioritize existing cases over new applications, which is further compounded by the seasonality of student applications.
- » **Gaps in benefits:** Students who qualified for the K–12 FRPM program or whose family receives CalFresh benefits automatically lose access to those benefits once they start college unless they apply for benefits separately as postsecondary students. Moreover, adults who receive CalFresh benefits before enrolling in college are required to reapply for CalFresh benefits as a postsecondary student and are subject to the more rigorous student eligibility rule. Once a student is approved for CalFresh benefits, the system requires a recertification process every 6 months. This process frequently causes a temporary or permanent loss in benefits. Nearly 36 percent of CalFresh students lose their benefits because of these recertification steps.¹⁵

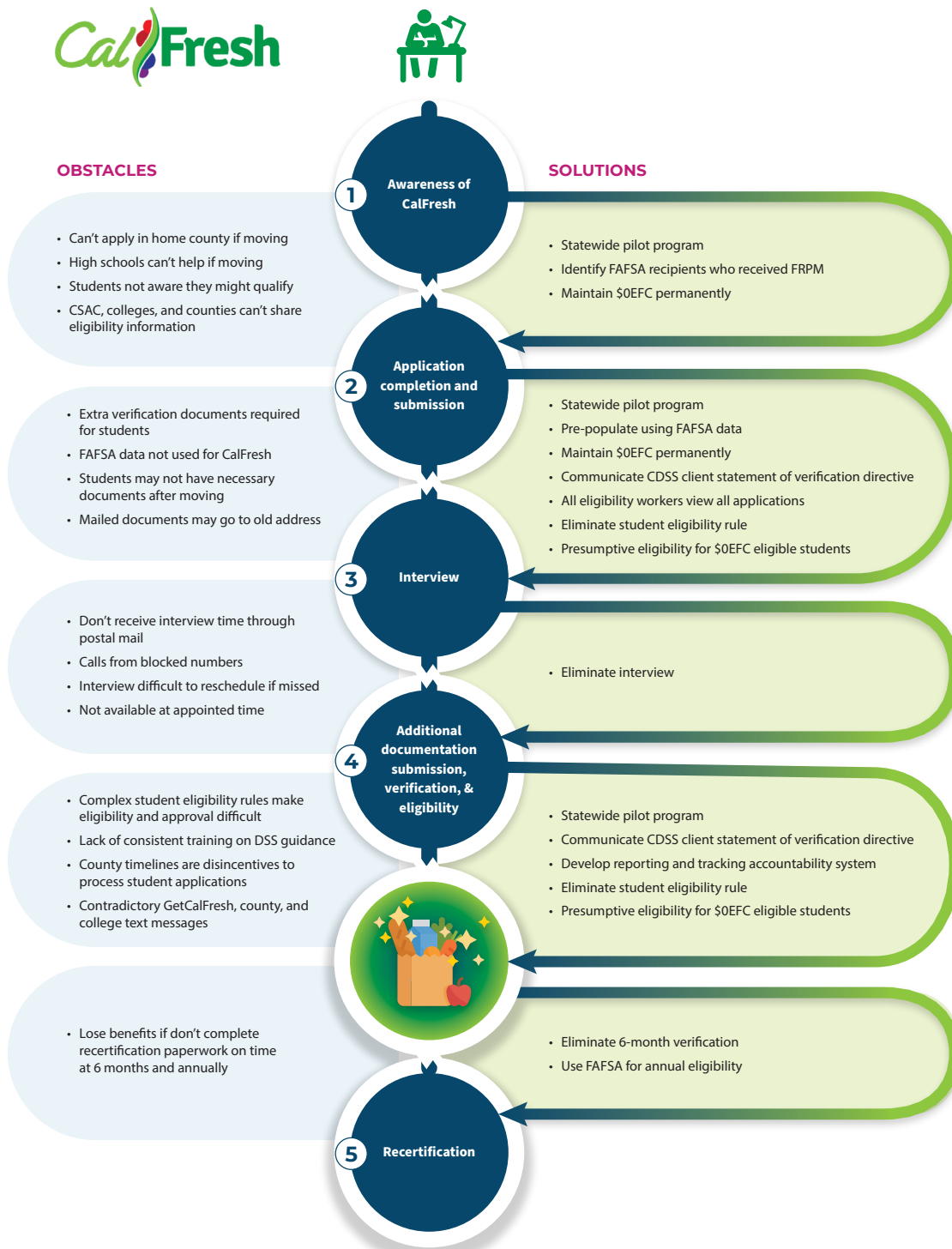
The combination of these process barriers and the difficulty of navigating the system greatly reduces the likelihood that students can access CalFresh food benefits successfully. Figure 1 provides a visual overview of the steps involved in CalFresh eligibility, the breakdowns in the process that are specific to postsecondary students, and proposed solutions (detailed in the next section).

13 Current, temporary federal relief waives the interview requirement. California has also made efforts to make this requirement more flexible, such as through AB 79 and ACL 21-24.

14 There are existing efforts to support the resolution of these issues, including the development of a verification hub and attempts to lift restrictions for verifying student exemptions.

15 California Policy Lab (in press). *CalFresh take-up and recertification*. University of California, Berkeley.

Figure 1. Steps Involved in CalFresh Eligibility, Obstacles Specific to Postsecondary Students, and Proposed Solutions



Source: WestEd. (2022).

Short-Term and Long-Term Systemic Policy Recommendations That Aim to Substantially Streamline and Create Efficient and Equal Access to CalFresh Benefits

The series of sustainable and actionable recommendations included in this report address many of the systemic barriers that have kept postsecondary students out of the CalFresh program. Some recommendations require state policy changes, whereas others require federal action.

Short-Term Pilot Programs

1. Establish a pilot portal and regional hubs for students to apply for and be approved for CalFresh benefits, following the Cash Assistance Program for Immigrants model.

Because students face a unique set of circumstances and barriers in applying for and receiving CalFresh benefits, creating a pilot statewide portal to assist in processing student applications would provide a vehicle for increasing the efficiency of the process and accessing staff to support the seasonality of student applications. Workgroup participants learned that some of the central challenges students face in accessing CalFresh benefits include their having to move across county boundaries to attend school, the difficulty of navigating the application process, and the significant backlog in processing student applications caused by large numbers of students applying at the beginning of each term. Designating a portal and a regional hub system by a consortium of counties could help mitigate these challenges.

In this pilot program, three to five county offices could opt in to be designated as regional hubs that work with a consortium of county offices in their area to support centralized, student-specific training; coordinate staffing allocations to address the surge of student applicants at the beginning of each term; and allow for a more concentrated focus on students in order to streamline the application, eligibility, and approval processes. Each regional hub site would be staffed by eligibility workers trained specifically to review student applications. This training would focus on areas such as applying eligibility criteria to student applicants and becoming more familiar with documentation that students must provide to validate eligibility. The regional hub, in coordination with other county agencies in the consortium, would be staffed to address surges in applications, which would decrease delays in processing. Finally, this consortium could further streamline the application process by also coordinating to provide help to students who are crossing county boundaries to attend school. This hub system would be accompanied by a pilot portal that would be used to facilitate the operation of the system.

This regional hub model already exists in California in the form of the Cash Assistance Program for Immigrants (CAPI). CAPI was created in 1999 to provide monthly cash benefits to aged, blind, and disabled noncitizens who are ineligible for Supplemental Security Income/State Supplementary Payment (SSI/SSP). This program is administered through a consortium of counties that opt in and that designate one agency to process their applications for a defined population.

State policy action: State statutory change to implement and new one-time funding.

2. Establish a new, state-funded pilot food support program for undocumented students who complete the California Dream Act Application.

The barriers undocumented students experience when trying to access CalFresh benefits are exacerbated by the federal rules and policies that explicitly exclude them from applying for any type of federal benefit assistance program. Based on workgroup feedback, it is recommended that the state leverage the existing California Dream Act Application (CADAA), which undocumented students already utilize to access state financial aid, to help streamline students' equal access to food benefits. The CADAA could serve as a central access point by which students can be considered simultaneously for both financial aid and state-funded food benefits and can be recertified annually.

State policy action: *State statutory change to implement and new one-time funding.*

Short-Term Policy and Regulatory Recommendations

1. Use Free Application for Federal Student Aid data to prepopulate CalFresh applications.

Prepopulating data from the Free Application for Federal Student Aid (FAFSA) to the CalFresh application—with some supplemental information—would decrease the burden on students to re-enter information they have already provided for the FAFSA.

State administrative action: *State administrative policy change to implement and targeted one-time funding for IT infrastructure.*

2. Enhance data-sharing agreement with the California Department of Education to identify all K–12 students who were in the FRPM program.

CSAC can enhance an existing data-sharing agreement with the California Department of Education (CDE) to identify FAFSA filers who were in the FRPM program and to inform them of their potential eligibility for CalFresh benefits.

State administrative action: *Enhance memorandum of understanding (MOU) between CSAC and the CDE.*

3. Maintain permanent use of \$0 Expected Family Contribution status as a metric that determines eligibility to apply for CalFresh benefits.

Under the current emergency federal COVID-19 provisions, the U.S. Department of Agriculture (USDA) determined that all FAFSA filers with an Expected Family Contribution (EFC) of \$0 are eligible to apply for CalFresh benefits without meeting other student eligibility rule requirements. This change enabled more students to receive CalFresh and should be made permanent.

Federal policy action: *Federal statutory change to implement.*

4. Eliminate interview requirement for students.

Currently the USDA's pandemic interview requirement waiver is in place. Eliminating the interview requirement permanently for students who have complete applications would streamline the process and address students' unique logistical challenges.

Federal policy action: *Federal statutory and regulatory changes to implement.*

5. Clearly and concisely communicate CDSS directive to county offices that they accept client statements of verification.

The acceptance of this verification effectively exempts students from the student eligibility rule without their having to provide additional documents, eliminating a significant barrier for student access to CalFresh. There have been recent reports of some eligibility workers not being aware of this directive. Additional resources should be marshaled to clearly and concisely communicate the directive to eligibility workers and to provide them with training to increase their understanding and implementation of this significant policy.

State administrative action: *State administrative change to implement and fund.*

6. Create a reporting and participation tracking system to collect student data regarding CalFresh.

The collection of statewide data on postsecondary student participation in CalFresh is critical for addressing the issues with the current system. A reporting and participation tracking system could be used to collect data regarding students estimated to be eligible for CalFresh benefits, students served by the program, and college CalFresh applications, including timelines, acceptance and denial statistics, and demographics.

State administrative action: *State statutory change to implement and fund.*

7. Revise the funding allocation methodology for local counties in order to align incentives and address surges in applications in the general and student populations.

The current funding formula that provides monetary support to county offices that are responsible for the administration, eligibility determination, processing, and tracking of the CalFresh program is outdated and misaligned to current needs. Over the past several decades, larger numbers of Californians who are eligible for CalFresh benefits are entering postsecondary institutions and the funding incentives for counties have not kept pace. Implementing this recommendation would revise the allocation methodology and increase funding for counties to account for the substantially increased workload of county offices that must determine the eligibility of more applicants and that experience surges in the submission of student applications throughout the year.

State policy action: *State statutory change to implement and fund.*

8. Direct colleges and universities to require local campus food service venues to accept EBT cards from CalFresh students for food purchases.

Some colleges and universities have transitioned to enabling campus food service venues to accept EBT cards from CalFresh students for food purchases, which has streamlined transactions between students and venues and has reduced any stigma students may feel. This recommendation would direct all California colleges and universities to require that the food service venues on their campus accept EBT cards from CalFresh students for their food purchases.

State policy action: *State statutory change to implement and targeted one-time funding to support transition period.*

9. Allow county eligibility workers to view, transfer, and process all BenefitsCal/CalFresh applications via the California Statewide Automated Welfare System so that students can apply in their home county before moving.

Eliminate the processes of the California Statewide Automated Welfare System (CalSAWS) that prevent eligibility workers from viewing applications from outside their county and create a system in which all eligibility workers can access, transfer, and process any application. In addition, integrate a consumer-friendly scheduling option into CalSAWS that would allow students to select open interview times online if an interview is required as part of the application process.

State administrative action: *State statutory change to implement.*

10. Develop a statewide student portal within the BenefitsCal System.

Establishing a statewide portal for students to complete their CalFresh applications within the BenefitsCal system would be a critical step in beginning to customize the application process for postsecondary students.

State administrative action: *State statutory change to implement and new one-time funding.*

11. Develop a coalition of other states and organizations to advocate for changes at the federal level.

Although California has a broad coalition of individuals that can support and advocate at the federal level for the legal and regulatory changes recommended in this report, there likely is more strength in building a broader coalition of other states, organizations, and agencies. Developing such a coalition may involve identifying those organizations and agencies that align to these recommended changes.

Federal policy action: *Federal statutory change to implement.*

Long-Term Policy and Regulatory Recommendations

1. Permanently eliminate the federal student eligibility rule.

The student eligibility rule is premised on an understanding of student circumstances that no longer holds true, and it should be repealed. The elimination of this rule would greatly accelerate eligibility verification for applicants and substantially reduce the paperwork and processing burden on individual county workers and their offices.

Federal policy action: *Federal statutory change to implement.*

2. Verify SNAP recertification for students through the annual FAFSA submission and eliminate the 6-month eligibility status check.

Because student financial circumstances do not change considerably while they are attending postsecondary institutions, the federal government should waive completion of the 6-month verification and instead use information collected in the FAFSA to recertify.

Federal policy action: *Federal statutory change to implement.*

3. Provide presumptive eligibility for students who are \$0 EFC eligible, participants of the FRPM program, or from a household that receives SNAP benefits.

This would include recipients of benefits funded through the Temporary Assistance for Needy Families (TANF) program or the FRPM program and recipients of the maximum Pell Grant under the new Student Aid Index (SAI). Final verification could be provided with required supplemental information, but automatic access to SNAP benefits under any of these programs would be initiated.

Federal policy action: Federal statutory change to implement.

Together, these short-term and long-term recommendations have the potential to transform the CalFresh experience for California postsecondary students by removing outdated roadblocks, aligning to existing systems, and creating a statewide system for students specifically. This report serves as a roadmap for how to eliminate barriers to CalFresh access for students in the near term while pursuing other reforms that will take more time. The intent of this report is to create a CalFresh system that is truly responsive to the student experience and that helps every California postsecondary student move one step closer to successfully completing their education.

BACKGROUND

Each year California educates over three million students in its postsecondary institutions who are on a path to a successful professional career.¹⁶ Less known is that nearly half of all of California's postsecondary students face food insecurity. Each year, nearly a quarter-million students transition into one of California's three postsecondary education systems from a California K–12 public school where they qualified for and received free or reduced-price meals.¹⁷ Based on the latest available data, approximately 44 percent of University of California (UC) students, 42 percent of California State University (CSU) students, and 50 percent of California community college students are experiencing food insecurity.¹⁸ Students' financial challenges have been exacerbated by the COVID-19 pandemic, which has only amplified the issue of postsecondary students' food insecurity. In September 2019, one in three California postsecondary students reported experiencing food insecurity in any given month.¹⁹ A subsequent survey taken early in the pandemic revealed that 7 in 10 students lost some or all their income because of the pandemic, income that was a key source for providing basic needs such as

16 These figures include students attending nonprofit colleges and universities. Johnson, H., & Cuellar Mejia, M. (2019, October). *Higher education in California: California's higher education system*. Public Policy Institute of California. <https://www.ppic.org/publication/higher-education-in-california-californias-higher-education-system/>

17 Authors' calculations derived from the CDE (2021), *Fingertip Facts on Education in California*, <https://www.cde.ca.gov/ds/ad/ceffingertipfacts.asp>.

18 University of California Global Food Initiative. (2017, December). *Global food initiative: Food and housing security at the University of California*. https://www.ucop.edu/global-food-initiative/_files/food-housing-security.pdf; Crutchfield, R., & Maguire, J. (2018, January). *Study of student basic needs*. The California State University. https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Documents/BasicNeedsStudy_phaseII_withAccessibilityComments.pdf; Goldrick-Rab, S., Baker-Smith, C., Coca, V., & Looker, E. (2019, March). *California community colleges #RealCollege Survey*. The Hope Center, California Community Colleges. <https://hope4college.com/wp-content/uploads/2019/03/RealCollege-CCCCO-Report.pdf>

19 California Student Aid Commission (CSAC). (2019). *2018–19 Student expense and resources survey: Initial insights: An initial look at the obstacles students face affording higher education*. https://www.csac.ca.gov/sites/main/files/file-attachments/2018-19_student_expenses_and_resources_survey_web.pdf?1575327209

food.²⁰ Increased challenges such as these have led to students dropping out of their postsecondary programs, especially at community colleges.

For low-income students in California's public, private, and nonprofit postsecondary institutions, food benefits must be accessed through a program called CalFresh. CalFresh is the California program that executes the federal Supplemental Nutrition Assistance Program (SNAP), one of the most expansive anti-hunger programs in the world. CalFresh is overseen and regulated by the California Department of Social Services (CDSS) and is managed and administered by local welfare offices in each of the state's 58 counties. This program is targeted specifically to support populations that do not earn sufficient income to provide for basic nutritional food needs. However, importantly for postsecondary students, the SNAP *student eligibility rule* sets a more rigorous and higher threshold for students to access CalFresh benefits. When the original SNAP program was established in 1977, the student eligibility rule was established to exclude college students from qualifying for benefits based on monthly income alone because, at the time, college students were more likely to have substantial family support and come from households whose parents had graduated college.²¹

The CalFresh program offers critical resources that can help offset food costs for students, yet most students do not apply. It is estimated that between 400,000 to 750,000 college students are potentially eligible for federal CalFresh benefits, but only approximately 127,000 students receive these benefits annually.²² In the face of the outdated and out-of-context student eligibility rule, many California institutions have established workarounds to ensure that postsecondary students have access to CalFresh benefits. Some of these efforts include raising awareness through outreach on campuses or shepherding students through the complex and multistep application process. Yet, students continue to face numerous barriers that make it exceedingly difficult for them to access and maintain CalFresh benefits.

For example, the complicated rules, required documents, multiple verification systems, and lengthy interviews cause backlogs for eligibility workers.²³ In addition, students who have been approved for CalFresh benefits are required to submit paperwork every 6 months to recertify that they continue to meet the means test for their benefits. This recertification requirement causes many eligible beneficiaries to drop out of the program.²⁴

20 CSAC & California Education Lab, UC Davis School of Education. (2020, July). *COVID-19 student survey*. https://www.csac.ca.gov/sites/main/files/file-attachments/2020_covid19_student_survey.pdf

21 Garratt, R. (n.d.). *Reexamining SNAP policies for college students*. Community Commons. <https://www.communitycommons.org/collections/Reexamining-SNAP-Policies-for-College-Students>

22 Note that these data were collected prior to the onset of the pandemic. These figures may have increased since the pandemic began. California Department of Social Services (CDSS). (2020, June). *Senate Bill 77 CalFresh student data report*. <https://www.cdss.ca.gov/Portals/9/Leg/202006-SB-77-CalFresh-Student-Data-Report.pdf>; Granville, P. (2020). *Pathways to simplify and expand SNAP access for California college students*. The Century Foundation. <https://tcf.org/content/report/pathways-simplify-expand-snap-access-california-college-students/>

23 The approval rate is only about 39 percent for college students compared with 60 percent for the general public.

24 Unrath, M. (2021, January). *Pushed out by paperwork: Why eligible Californians leave CalFresh* [Policy brief]. California Policy Lab. <https://www.capolicylab.org/wp-content/uploads/2021/02/Pushed-out-by-paperwork-why-eligible-Californians-leave-CalFresh.pdf>

CSAC CALFRESH WORKGROUP

To bring further attention and possible solutions to the challenge of food insecurity within California's postsecondary education systems, the California Student Aid Commission (CSAC) convened a CSAC CalFresh workgroup charged with finding ways to support California postsecondary students by enhancing access to CalFresh food benefits.

The workgroup was made up of a cross-section of representatives from California, including representatives from the state legislature, various state agencies, students, researchers, county practitioners, postsecondary institutions, and other local practitioners, and was asked to help close the gap in California between the number of postsecondary students receiving food benefits and those who are eligible and need that support. (See Appendices A and B for the workgroup's members and meeting dates.) The workgroup was convened to study and provide recommendations that address the following goal:

Increase the number of California postsecondary students currently enrolled and receiving CalFresh benefits measured by year-over-year changes in dispersed benefits by streamlining the process and raising awareness of eligibility.

This goal is consistent with a growing body of research that has highlighted the financial and support needs of postsecondary students beyond tuition and fees. Financial aid has not kept pace with nontuition costs such as food, housing, transportation, technology, books, and supplies. These costs have grown exponentially, making it increasingly difficult for students to pay for a postsecondary education.²⁵ Especially in California, a lack of affordable housing for and food insecurity among the state's postsecondary students has garnered notable and ongoing attention. According to the 2019 Student Aid Commission's triannual Student Expense and Resources Survey, one out of three students reported experiencing food insecurity, housing insecurity, or both in any given month.²⁶

The workgroup aimed to also advance two input goals that they believe are directly linked to achieving the outcome goal:

- » Increase the number of students who are aware that they could be eligible for CalFresh, measured by information sent and subsequent engagement (e.g., text responses, website hits, applications received).
- » Simplify and streamline the process for students to apply for, gain approval for, and renew benefits.

25 Granville, P. (2020). *Pathways to simplify and expand SNAP access for California college students*. The Century Foundation. <https://tcf.org/content/report/pathways-simplify-expand-snap-access-california-college-students/>; Mello, F. (2020, June 23). *The soul-crushing cost of college in California, explained*. *Explainers*. CalMatters. <https://calmatters.org/explainers/california-cost-of-college-explained/>; CSAC. (2019). *2018–19 Student expenses and resources survey: Initial insights: An initial look at the obstacles students face affording higher education*. https://www.csac.ca.gov/sites/main/files/file-attachments/2018-19_student_expenses_and_resources_survey_web.pdf?1575327209.

26 CSAC. (2019). *2018–19 Student expenses and resources survey: Initial insights: An initial look at the obstacles students face affording higher education*. https://www.csac.ca.gov/sites/main/files/file-attachments/2018-19_student_expenses_and_resources_survey_web.pdf?1575327209

OVERVIEW OF SNAP AND CALFRESH

CalFresh is the program that executes SNAP in California. CalFresh is the primary provider of government-supported nutrition assistance in the state. As in all other states, there are limitations on postsecondary student eligibility for CalFresh benefits in California because of the federal student eligibility rule, which sets a more rigorous and higher threshold for students to access these benefits.²⁷ The requirements are designed to exclude postsecondary students from eligibility unless they can demonstrate that they are impoverished and do not have access to familial support resources.

The student eligibility rule is longstanding and has its roots in a now outdated set of assumptions about the postsecondary student experience—mainly that students' income and resources might be low while they are attending college but that most have family who will ensure they have consistent access to nutritional food. Congress established the special set of eligibility rules in the 1970s to prevent upper- and middle-income families from receiving food stamps, but today these rules do not reflect the experience of many students and they prevent many students from accessing essential nutrition benefits.²⁸

These rules create a complex web of issues for student applicants to navigate and for eligibility workers to understand when approving food benefits. Under federal SNAP regulations, students impacted by the student eligibility rule are aged 18 through 49, physically and mentally fit for employment, and enrolled at least half-time at a public or private institute of higher education. Students are ineligible to participate in CalFresh unless they meet the criteria for at least one of the identified exemptions. Some of these exemptions are accompanied by complex rules and forms that, based on the experiences of students seeking these benefits, are often implemented unevenly across the state. Table 1 provides a summary of criteria for exemption of a postsecondary student from the SNAP student eligibility rule, and these criteria are expanded upon and cited in Appendix D.

27 Legislative Analyst's Office. (2018, February 14). *Overview of select safety net programs: SSI/SSP, CalFresh, and CalWORKs*. <https://lao.ca.gov/handouts/socservices/2018/Safety-Net-Programs-021418.pdf>

28 *CalFresh access for college students, California Assembly Budget Subcommittee No. 2 on Education Finance, 2021–22 session* (2021) (testimony of Alexis Fernandez).

Table 1. Summary of Criteria for Exemption of a Postsecondary Student from the SNAP Student Eligibility Rule

Demonstrated Working Status	Individual/Family Circumstances	Employment/Training Program
<ul style="list-style-type: none"> • Employed 20 hours a week based on reasonable anticipated monthly average • Receiving federal or state work-study money • Enrolled in Extended Opportunities Programs and Services 	<ul style="list-style-type: none"> • Approved for a TANF-funded Cal Grant A or B • Has children under 12 or is receiving CalWORKS • Does not intend to register for the next normal school term 	<ul style="list-style-type: none"> • Enrolled in CalFresh employment and training (FSET) program • Enrolled in a program to increase employability, including programs for students from a low-income family or from foster care • Enrolled in a Workforce Innovation and Opportunities Act program • Enrolled in Extended Opportunities Programs and Services

Source: Adapted from Legal Services of Northern California. (2022). *LSNC guide to CalFresh benefits*. <http://calfresh.guide/special-rules-for-students/>

Federal, State, and Local Agencies That Oversee, Manage, and Administer CalFresh

One of the complexities of the CalFresh program for college students is that no one organization has authority over this benefits program. The policies and administration of benefits intersect with multiple state, federal, and county offices and colleges and universities, so students must contend with different procedures, rules, and navigation within and across various entities to access their benefits. These entities are as follows:

United States Department of Agriculture. The USDA establishes policies, enforces laws, and issues regulations that determine SNAP program eligibility for benefits, including those for college students nationwide.

California Department of Social Services. CDSS is the state agency that provides aid, services, and protection to needy children and adults while strengthening and encouraging individual responsibility and independence for families. CDSS oversees the CalFresh program and the local offices that process the CalFresh applications.

County welfare directors. Each county in California has personnel to process CalFresh applications. These offices are staffed by county eligibility workers who also process other benefits such as CalWORKS and Medi-Cal.

California Student Aid Commission. CSAC is the principal state agency responsible for administering financial aid programs for students attending public and private universities, colleges, and vocational schools in California. CSAC is not currently involved in the administration of CalFresh benefits, but the agency does send notifications to all students who are exempt from the student eligibility rule and encourages them to apply for CalFresh benefits.²⁹

California colleges and universities. There are over 281 colleges and universities in California, including public, private, and nonprofit institutions. CalFresh support varies widely across these schools. Some have basic-needs infrastructure, including food pantries on campus, whereas others do not. Some campuses have agreements with their local county office to have eligibility workers on campus. Many campuses also have CalFresh Outreach teams on their campuses through various types of federal and state basic-needs funding.

A System With Rules Misaligned to the Needs of California's Postsecondary Students

The complex and outdated rules of the federal SNAP program have hampered state policymakers' efforts to devise policy solutions that are better able to address the rapidly shifting needs of California postsecondary students' basic needs. This is further exacerbated by eligibility workers who are overextended by growing caseloads and who must comply with a federal incentive structure that compensates counties based on processing speed and the number of completed approvals. This system does not encourage attention to CalFresh applications for postsecondary students, which can be more complex than those of the general population.

Despite an existing system designed to keep students from qualifying for food benefits, the California legislature and numerous governors have attempted to craft solutions that attempt to meaningfully address postsecondary students' basic food needs. Since at least 2014, California has launched various policy initiatives and programs to alleviate challenges for postsecondary students on hundreds of college and university campuses. Appendix C documents these efforts and dedicated funding during this time.

To address the severe impacts of the COVID-19 crisis, the federal government responded by increasing access to and funding for many public assistance programs, including SNAP. There have been several significant, albeit temporary, steps taken to provide more efficient access to eligible postsecondary students during the pandemic. In particular, the federal government took steps to waive the student eligibility rule for postsecondary students if their expected family contribution (EFC) through federal aid applications such as the Free Application for Federal Student Aid (FAFSA) was \$0 or they were eligible to participate in the Federal Work–Study program. This action helped many \$0 EFC students who may not have been deemed eligible before this change to receive CalFresh benefits. The federal government also allowed postsecondary students to self-verify their exemption to the student eligibility rule and forego the required interview requirement. These regulatory changes have increased the number of eligible postsecondary students who have been able to gain greater and more efficient access to the program.

29 CSAC. (2020). *Cal Grant modernization: A vision for the future*. Commissioned by AB 1314 and SB 291. https://www.csac.ca.gov/sites/main/files/file-attachments/cal_grant_modernization_report_legislature.pdf?1583522224

STUDENT NEEDS ARE DIFFERENTIAL AND COMPLEX IN REGARD TO ACCESSING CALFRESH BENEFITS

College is a major milestone for many students who leave home for the first time to live on their own. The challenges of this period of transition are exacerbated for students living in poverty or who are undocumented. And, as the demographic of students attending college continues to shift to more students who need supports, there is a growing demand for the CalFresh system to adjust. For example, students who qualified for California's K–12 free and reduced-price meal (FRPM) program or whose family receives CalFresh benefits have no easy way to access a similar benefit when they leave 12th grade or move away from their family. Their benefits under the FRPM are terminated when they graduate from high school, and to receive CalFresh benefits in college, they must apply for them independently of their family.

Undocumented students are prohibited from receiving any federal benefits, including CalFresh and Pell Grants. In California, approximately 50,000 students annually complete a California Dream Act Application (CADAA) that provides access to the state's Cal Grant. This grant covers tuition at 4-year institutions and a \$1,648 nontuition grant for community college students and some 4-year students. However, without any assistance for basic food needs, students struggle to stay in college.

These circumstances and the transient nature of postsecondary students create a unique set of challenges that are in addition to an already daunting CalFresh eligibility process. When the workgroup mapped the process for students to access CalFresh benefits, it became evident that students encounter challenges at nearly every step of the process.

CalFresh is a complex program for all Californians to access, and the unique needs of students compound their challenges in accessing CalFresh. All California applicants must schedule interviews through complex mechanisms, participate in an interview, and then complete paperwork to continue benefits at 6 months and 1 year after their initial application. These difficult processes contribute to California consistently being one of the states to provide food benefits to the smallest proportion of eligible beneficiaries in the general population; only five states had a lower participation rate than California in 2017.³⁰ There are five broad steps students must take to receive CalFresh benefits, including having an awareness of CalFresh, completing and submitting an application, being interviewed, submitting additional documentation to verify eligibility, and completing the steps for recertification.

The difficulties of this process are compounded for students who must meet additional requirements because of the student eligibility rule, who change residences frequently, or who do not adapt to the system's use of outdated communications.

30 Tiano, S., & Abram, S. (2021, February 11). Paperwork problems keep hungry Californians from getting food stamps. *The Imprint*. <https://imprintnews.org/child-welfare-2/paperwork-problems-keep-hungry-californians-from-getting-food-stamps/51811>

Steps Students Must Take to Access CalFresh Benefits

- » Have an awareness of CalFresh
- » Complete and submit an application
- » Be interviewed
- » Submit additional documentation to verify eligibility
- » Complete the steps for recertification

CHALLENGES TO POSTSECONDARY STUDENT CALFRESH ACCESS

The workgroup learned that there are unique barriers that postsecondary students must overcome to receive CalFresh benefits. Although many past efforts have focused on increasing outreach in order to identify and assist eligible students, there are more critical barriers to address. These include limited awareness and navigation support, outdated communication tools, complex processes, processing delays, and gaps in benefits.

College students are different from many other CalFresh recipients in that they have already committed to getting a postsecondary education so they can attain full-time employment, pursue a career, and achieve upward financial mobility. The workgroup observed that it is critical for policymakers to understand the barriers students face when trying to access CalFresh benefits and to help students achieve their goals by supporting a most basic need—food. Each of the following explanations captures the discussion and analysis from various workgroup meetings about these challenges.

Students' Key Barriers to Accessing CalFresh Benefits

- » Limited awareness and navigation support
- » Outdated communication tools
- » Complex processes
- » Processing delays
- » Gaps in benefits

Limited Awareness and Navigation Support

There is no statewide system that supports various agencies in identifying potential CalFresh recipients, alerting them to the benefits, and helping them through the system. When transitioning to post-secondary education, students often have limited awareness of the CalFresh program, and when they do decide to apply for benefits, they must navigate complex application processes.

One of the many transitions students experience when graduating from 12th grade and going to college is figuring out how to pay for food. While still in high school, some students received CalFresh with their families or participated in the K–12 FRPM program. Thus, they proved their eligibility for at least the year they left high school, if not annually for multiple years prior. However, once students graduate high school, these food supports stop, creating a near-immediate gap in their benefits. When high schools inform graduating students about applying for CalFresh in college, they cannot help students enroll for benefits unless the student plans to attend college in the same county. And when students enter college, they may hear about CalFresh benefits when they apply for other basic-needs support, but this is not consistent among California campuses.

Students who enter college after having been out of high school for some time face a different set of challenges, even if they already receive CalFresh benefits. Once they become a student, they are required to qualify under the student eligibility rule requirements. Given the complexity of this set of rules, these students often need support from campus student services personnel to navigate the new requirements for eligibility. It is often stated that students successfully complete the CalFresh application process if they have someone to guide them through each step. Alternatively, if they don't have someone to give direct guidance, they are unlikely to succeed in accessing benefits. The system is not designed for self-service; rather, it requires direct assistance to succeed.

Outdated Communication Tools

The CalFresh program uses communication mechanisms such as postal mail, blocked numbers, and an intercounty transfer process for students moving between counties when applying. These outdated communication mechanisms pose barriers for students who move outside their county for college, have multiple residences, or tend to use various forms of electronic communication.

Currently, a student who will attend college outside of their home county must apply in the county in which they will reside when in school.³¹ Often, students reach their new county just before classes begin. As a result, they may be slow to apply for CalFresh in the new county, which could delay their access to CalFresh benefits as they start college. Moreover, if they applied for CalFresh benefits in their home county before moving away to college, they would be dependent on an intercounty transfer process that is rarely used because it has become outdated and unreliable. If facing food insecurity, the delays caused by these processes could be catastrophic for a first-year student just getting started on their college journey.

³¹ California is only one of 12 states that has delegated this authority to counties.

Once a student's application is received by the county office of jurisdiction and added to the management system, a county eligibility worker receives the application and schedules an interview. The eligibility worker typically sends a paper notice through the mail to inform the applicant of their interview time. Many students don't receive this notice, or the interview time selected by the county does not agree with their schedule. Students have regularly scheduled classes and sometimes are working, which gives them limited time to schedule their CalFresh interview, a key step in gaining approval for food benefits. Various counties are attempting to address this issue. For example, GetCalFresh.org partnered with Los Angeles County to pilot on-demand interview scheduling. Clients, including students, were provided the opportunity to call the county for their interview at a time that worked for them. Results from this pilot showed that this flexibility for clients did indeed improve outcomes.

The interview may occur in person or virtually. The purpose of the CalFresh interview is to help applicants understand the CalFresh program and gather additional eligibility information, including family income. During the interview, applicants learn whether there are other verification documents they need to submit. During the pandemic, interviews have either been waived or conducted over the phone. This has temporarily streamlined the process for students, but CalFresh is expected to return to in-person interviews after the federal COVID emergency order ends.

The current interview notification methods were established long before cell phones and web-based applications were commonplace. Commonly, students miss their interview because they do not receive their letter through the postal service or they have a conflict at the allotted interview time. Unfortunately, rescheduling is often a laborious process. If a student misses an interview, rescheduling an appointment requires calling the county office and potentially waiting on the phone for long periods of time. In some locations, the county office sends text messages to remind students of their interview time. If students have questions, they must either leave a message for their eligibility worker or navigate a customer support center.

Once an application is approved, the final hurdle is that eligibility workers send a mailed letter of approval or denial. If approved, the EBT card and PIN information is sent in two separate mailed letters. Because students move frequently, it is more likely that their EBT card and PIN information will be sent to old addresses, further delaying their access to CalFresh benefits.

Complex Processes

The CalFresh system is a complicated process to navigate and requires that many documents are submitted at different times in the process. The county system is not designed for students, and each county has a different process for how CalFresh applications are assigned and overseen. County eligibility workers are often required to process applications for other eligibility programs in addition to those for CalFresh, and the federal timeline and reimbursement system create disincentives for county offices to prioritize processing college applications.

CalFresh applicants can complete a short preliminary application at GetCalFresh.org. Through this service's user-friendly web portal, applicants answer preliminary questions and submit initial verification documents—often in less than 10 minutes. However, after their interview they must submit additional documentation as requested. Applicants also have an option to complete the full application at a county website or office. Although completing the full application is more time consuming, it does provide all the information needed to begin processing the student's application.

There is a long history of county eligibility workers being overextended in meeting the demand for CalFresh benefit approval. Because county eligibility workers are often required to process applications for eligibility programs other than CalFresh, it is difficult for eligibility workers to understand all the complexities of the student eligibility rule. CDSS often sends out All County Letters (ACL) to provide additional information and clarification regarding new and revised policies, but local county offices have varying staffing resources and timelines to train all eligibility workers on them. For example, DSS has sent out an ACL about allowing a client statement of verification for the student eligibility requirements, yet many eligibility workers continue to request documents to verify these requirements.

Additionally, current federal SNAP guidelines provide reimbursement only for completed CalFresh applications. Eligibility workers strive to process as many applications as possible, but because they are not compensated for incomplete applications, they have less incentive to complete student applications that require a more rigorous review than do applications submitted by the general population.

There are many eligibility workers who spend significant time processing applications that ultimately get denied, but they do not receive compensation for denied applications. Thus, they have less incentive to provide outreach and recruit new students, who are less likely to get approved for food benefits. County offices are already extremely busy and often must triage how they review and approve the greatest number of applications. Even so, many county offices still commit to establishing outstationed personnel on campuses to help students complete and submit their CalFresh applications, even though they have limited resources. However, these efforts have never been brought to scale.

Processing Delays

Students typically submit CalFresh applications at the beginning of each term. This causes seasonal spikes in processing and places great strain on the county system, which can cause significant delays and high application denial rates because of limited county capacity. Additionally, eligibility workers often lack the training to understand how to apply the student eligibility rule when processing student CalFresh applications. And because the student eligibility rule requires more verification than do applications submitted by the general population, student applications take much longer to process and are often delayed or denied.

These unique circumstances are in addition to other challenging conditions county social service support offices have experienced over the last several years. Increasing caseloads and work demands leave little room for building the capacity of staff.

Gaps in Benefits

There are two recertification periods that cause significant CalFresh recipients to be lost each year. Six months after being approved, applicants must submit an eligibility status report to declare whether there have been relevant changes to their income. Proof must be attached to this report. In addition, applicants must complete an annual recertification report. Both reports ask for updates regarding an applicant's situation, such as living arrangements and income.

A large percentage of CalFresh recipients stop receiving CalFresh benefits at the 6-month and 1-year marks not because they no longer need food support, but because they didn't complete an eligibility status report and submit additional verifications. The California Policy Lab, in their 2021 brief *Pushed Out by Paperwork: Why Eligible Californians Leave CalFresh*, looked at data from the previous 15 years and estimated that 500,000 income-eligible households leave CalFresh each year and that there is a significant increase in people leaving during the months when paperwork is required. They further noted that households remain in CalFresh longer when they do not have to verify eligibility frequently.³² Such frequent verifications may not be necessary for postsecondary students who attend 2- or 4-year programs and typically do not experience significant income gains while in school.

SHORT-TERM AND LONG-TERM SYSTEMIC POLICY RECOMMENDATIONS THAT AIM TO SUBSTANTIALLY STREAMLINE AND CREATE EFFICIENT ACCESS TO CALFRESH BENEFITS

There are several opportunities for improving the process of becoming eligible for and receiving CalFresh benefits as a postsecondary student in California. Workgroup participants analyzed each step in the process and assessed the program's strengths, barriers, and challenges to generate recommendations that aim to increase the effectiveness of the CalFresh eligibility process. This section includes analysis and recommendations organized into three sections: (1) short-term pilot programs, (2) short-term recommendations, and (3) long-term recommendations. In addition to addressing needs in the short term, these recommendations offer the opportunity to learn and gather experiences that can inform future efforts to improve social services throughout the state.

Short-Term Pilot Programs

These pilot recommendations outline actions at the state level that can be acted upon within 3 to 15 months and implemented within 9 to 36 months.

- 1. Establish a pilot portal and regional hubs for students to apply for and be approved for CalFresh benefits, following the Cash Assistance Program for Immigrants model.**

Because students face a unique set of circumstances and barriers in applying for and receiving CalFresh benefits, creating a pilot statewide portal to assist in processing student applications would provide a vehicle for increasing the efficiency of the process and accessing staff to support the seasonality of student applications. Workgroup participants learned that some of the central challenges students face in accessing CalFresh benefits include their having to move across county boundaries to attend school, the difficulty of navigating the application process, and the

³² Unrath, M. (2021, January). *Pushed out by paperwork: Why eligible Californians leave CalFresh* [Policy brief]. California Policy Lab. <https://www.capolicylab.org/wp-content/uploads/2021/02/Pushed-out-by-paperwork-why-eligible-Californians-leave-CalFresh.pdf>

significant backlog in processing student applications caused by large numbers of students applying at the beginning of each term. Designating a portal and a regional hub system by a consortium of counties could help mitigate these challenges.

In this pilot program, three to five county offices could opt in to be designated as regional hubs that work with a consortium of county offices in their area to support centralized, student-specific training; coordinate staffing allocations to address the surge of student applicants at the beginning of each term; and allow for a more concentrated focus on students in order to streamline the application, eligibility, and approval processes. Each regional hub site would be staffed by eligibility workers trained specifically to review student applications. This training would focus on areas such as applying eligibility criteria to student applicants and becoming more familiar with documentation that students must provide to validate eligibility. The regional hub, in coordination with other county agencies in the consortium, would be staffed to address surges in applications, which would decrease delays in processing. Finally, this consortium could further streamline the application process by also coordinating to provide help to students who are crossing county boundaries to attend school. This hub system would be accompanied by a pilot portal that would be used to facilitate the operation of the system.

Utilizing a regional hub system to serve a select population in CalFresh would not be a new model for California. Such a system is used currently for Californians who apply for the Cash Assistance Program for Immigrants (CAPI). In response to the Personal Responsibility and Work Opportunity Act of 1996, California created the CAPI program in 1999 to provide monthly cash benefits to aged, blind, and disabled noncitizens who are ineligible for SSI/SSP. This eliminated SSI/SSP for most noncitizens who arrived in the United States after August 1996.

As part of how CAPI applicants apply for and receive benefits, depending on their residence their claims are administered by a county or a consortium of counties. This allows counties with few applicants to assist applicants more efficiently by working together to process claims and consolidate staff that specializes in this area.

The county offices that participate in the consortium would be funded through a grant or funding based on the number of approved student applications generated from within their respective counties. This pilot would serve to inform future statewide efforts to improve service to students, such as the new BenefitsCal system and the Cradle-to-Career system.

State policy action: *State statutory change to implement and new one-time funding.*

2. Establish a new, state-funded pilot food support program for undocumented students who complete the California Dream Act Application.

The barriers undocumented students experience when trying to access CalFresh benefits are exacerbated by the federal rules and policies that explicitly exclude them from applying for any type of federal benefit assistance program. In recognition of the unique circumstances of undocumented students, California can establish a new, state-funded food access benefit for them that is comparable to CalFresh.

California can administer this proposed benefit by leveraging the existing CADAA, having it serve as the central platform for undocumented students to apply for financial support toward nontuition expenses. Because this would be a state-established program, students could be provided with presumptive eligibility for this benefit based on information already received through their financial

aid application, such as their status as a \$0 EFC student (as proposed in long-term recommendation 3). This information would be confirmed through a supplemental application for a food access benefit that secures information consistent with that requested of CalFresh beneficiaries. CADAA-filing students could then renew their eligibility with their annual CADAA submission (as proposed in long-term recommendation 2). This pilot would also present a streamlined model with which California could demonstrate for the rest of the nation how student financial aid application data can be utilized to inform eligibility for other forms of public assistance.

State policy action: *State statutory change to implement and new one-time funding.*

Short-Term Policy and Regulatory Recommendations

These policy and regulatory recommendations outline actions at the state level that can be acted on within 6 to 12 months and implemented within 12 to 24 months.

1. Use Free Application for Federal Student Aid data to prepopulate CalFresh applications.

The FAFSA and CalFresh applications ask many similar questions and require many of the same verification documents. Prepopulating data from the FAFSA to the CalFresh application, along with some supplemental information, would decrease the burden on students to re-enter information they have already provided and to submit the same documentation to two different systems.

One meaningful step toward implementing this recommendation would be to identify applicable data inputted for the FAFSA from the California Longitudinal Pupil Achievement Data System (CALPADS). This step would be spurred by state statute and codified in a data-sharing agreement between the CDE and the CDSS. Further support for students could be provided by high school guidance counselors, who could help students who receive FRPM to complete the CalFresh application the semester before graduation and potentially in tandem with their FAFSA application.

State policy and administrative action: *State administrative policy change to implement and targeted one-time funding for IT infrastructure.*

2. Enhance a data-sharing agreement with the California Department of Education to identify all K–12 students who were in the FRPM program.

CSAC can enhance an existing data-sharing agreement with the CDE to identify FAFSA filers who were in the FRPM program and to inform them of their potential eligibility for CalFresh benefits. To decrease the burden on students to find and submit documentation, this data-sharing agreement could facilitate exchanging eligibility data and exemption qualifications more easily and could be coordinated with other triggers that identify student eligibility, such as an indication of a \$0 EFC on the FAFSA. Sharing student information across state agencies is a complex, but also meaningful, exchange that will require safeguards and access restrictions to protect students' personal information. California's Cradle-to-Career data system, which connects student information from many of the state's disparate data systems, may offer the appropriate vehicle to accelerate the implementation of this recommendation.

State administrative action: *Enhance a memorandum of understanding (MOU) between CSAC and the CDE.*

3. Maintain permanent use of \$0 Expected Family Contribution status as a metric that determines eligibility to apply for CalFresh benefits.

Under the current emergency federal COVID-19 provisions, the USDA determined that all FAFSA filers with an EFC of \$0 are eligible to apply for CalFresh benefits without meeting other student eligibility rule requirements. This change enabled more students to receive CalFresh and should be made permanent. If this recommendation were to be acted upon, one administrative step to implement it efficiently would be for CSAC to set up an alert in the FAFSA that would trigger outreach to eligible students to inform them of this benefit and offer them support throughout the application process.

Federal policy action: *Federal statutory change to implement.*

4. Eliminate the in-person interview requirement for students.

Currently the USDA's pandemic interview requirement waiver is in place. This waiver has expedited the application process for students by eliminating the need for an in-person interview—all communication has been through phone calls and other electronic means. This adjustment has resulted in a more efficient process for determining student eligibility. It has also reduced a significant burden for students, and it is recommended that this waiver be continued. Eliminating the in-person interview requirement permanently for students who have complete applications would streamline the process and address students' unique logistical challenges.

Federal policy and administrative action: *Federal statutory and regulatory changes to implement.*

5. Clearly and concisely communicate CDSS directive to county offices that they accept client statements of verification.

CDSS now accepts a student's statement as verification of their exemption from the student eligibility rule. The acceptance of this verification effectively exempts students without their having to provide additional documents. Few county eligibility workers are aware of the directive, which sometimes results in student CalFresh applications being unnecessarily delayed or denied. Resources should be marshaled to communicate the directive clearly and concisely to all county offices and to provide training to ensure it is understood. This training would replace the training eligibility workers currently receive regarding the documents required for verification.

State administrative action: *State administrative change to implement and fund.*

6. Create a reporting and participation tracking system to collect student data regarding CalFresh.

The collection of statewide data on CalFresh college student participation is critical for addressing the issues with the current system. Currently it is unclear how many students start a CalFresh application, what support they require from county offices or out-stationed eligibility workers, how many applications are accepted and denied, and for what reasons applications are denied. It is also unknown how many students do not complete the 6-month eligibility status report or annual certification, how many are dropped from the program, and how many reapply to continue their benefits. Furthermore, it would be helpful to have demographic data to understand whether the system is advantageous or disadvantageous to students from specific racial, economic, or geographic groups.

State policy and administrative action: *State statutory change to implement and fund.*

7. **Revise the funding allocation methodology for local counties in order to align incentives and address surges in applications in the general and student populations.**

The current funding formula that provides monetary support to county offices that are responsible for the administration, eligibility determination, processing, and tracking of the CalFresh program is outdated and misaligned to current needs. The formula, originated several decades ago, is a state-established allocation methodology that provides a portion of funds based on a county's caseload of CalFresh recipients. The original formula design used the logic that the funding basis would incentivize counties to ensure higher degrees of accuracy regarding applicants who were eligible for the benefit. In practice, this system worked for a time.

However, the environment has shifted substantially over the past several decades. Larger numbers of Californians who are eligible for CalFresh benefits are entering postsecondary institutions, and the funding incentives for counties have not kept pace. The result has been that the processing of applications is often bottlenecked in counties for which no funding is available to meet the growing need of determining eligibility or to address the acute seasonal needs that arise as postsecondary students apply for benefits from approximately July to September.³³ Neglecting to address this funding issue is a missed opportunity for counties and, in the aggregate, the state to support eligible CalFresh recipients.

Implementing this recommendation would revise the allocation methodology and increase funding for counties to account for the substantially increased workload of county offices that must determine the eligibility of more applicants and that experience surges in the submission of applications throughout the year.

State policy action: *State statutory change to implement and fund.*

8. **Direct colleges and universities to require local campus food service venues to accept EBT cards from CalFresh students for food purchases.**

The workgroup heard from students that some colleges and universities have made strides in the processes that allow CalFresh recipients to access food on their local campuses but that transactions remain cumbersome and bring some stigma.³⁴ Some colleges and universities have transitioned to enabling campus food service venues to accept EBT cards from CalFresh students for food purchases, which has streamlined transactions between students and venues and has reduced any stigma students may feel. As of January 2022, there are 11 college campuses whose food service venues accept EBT cards, including, most recently, Southwestern College, a community college in Chula Vista.

This recommendation would direct all California colleges and universities to require that the food service venues on their campus accept EBT cards from CalFresh students for their food purchases. This new policy would require a series of administrative changes for the college and the venues, which could be facilitated with a one-time allocation of funding.

State policy action: *State statutory change to implement and targeted one-time funding to support transition period.*

³³ Yolo County Human Services Agency. (2021, November). *CalFresh allocation methodology issues: Falling behind in serving some of California's most food insecure residents.*

³⁴ Panoo, A. (2021, November 23). Most California college students who qualify for "food stamps" aren't using them. *Sacramento Bee*. <https://www.sacbee.com/article255912906.html>

9. Allow county office eligibility workers to view, transfer, and process all BenefitsCal/CalFresh applications via the California Statewide Automated Welfare System so that students can apply in their home county before moving.

Students are not able to apply in their home county if they are planning to move to another part of the state. It is recommended that the California Statewide Automated Welfare System (CalSAWS) processes that prevent eligibility workers from viewing applications from outside their county be eliminated and that a system be created in which all eligibility workers can access, transfer, and process any application. It is also recommended that this change be accompanied by the integration of a consumer-friendly scheduling option into CalSAWS that would allow students to select open interview times. If an interview is required as part of the application process, students would benefit from being able to choose their preferred time online instead of being assigned an appointed time that may not work for them and that is communicated via a mailed letter they may not receive or a blocked phone number they may not answer.

State administrative action: State statutory change to implement.

10. Develop a statewide student portal within the BenefitsCal system.

Establishing a statewide portal for students to complete their CalFresh applications within the BenefitsCal system would be a critical step in beginning to customize the application process for postsecondary students. A pilot of such a portal would help inform best practices and provide benchmark data on increases to CalFresh participation among postsecondary students.

State administrative action: State statutory change to implement and new one-time funding.

11. Develop a coalition of other states and organizations to advocate for changes at the federal level.

Although California has a broad coalition of individuals that can support and advocate at the federal level for the legal and regulatory changes recommended in this report, there likely is more strength in building a broader coalition of other states, organizations, and agencies. Developing such a coalition may involve identifying those organizations and agencies that align to these recommended changes.

Federal policy action: Federal statutory change to implement.

Long-Term Policy and Regulatory Recommendations

These policy and regulatory recommendations outline actions at the federal level that can be acted on over a term of multiple years, with possible action beginning in 2 years.

1. Permanently eliminate the federal student eligibility rule.

The student eligibility rule is premised on an understanding of student circumstances that no longer holds true, and it should be repealed. The student eligibility rule (Section 273.5(a) of Title 7 CFR) requires students to provide documentation that shows their exemption from this rule to receive CalFresh benefits. Eliminating this rule would remove a host of extra steps that only students, not the general population, need to complete and would increase large-scale access to nutrition benefits for high-need postsecondary students. It would also substantially reduce

the paperwork and processing burden on individual county workers and their offices. Action by Congress and subsequent implementation by the USDA would be required.

Federal policy action: *Federal statutory change to implement.*

2. Verify SNAP recertification for students through the annual FAFSA submission and eliminate the 6-month eligibility status check.

Because student financial circumstances do not change considerably while they are attending postsecondary institutions, the federal government should waive completion of the 6-month verification and instead use information collected in the FAFSA (or the CADAA for undocumented students) to recertify. A waiver for students would make them exempt from having to complete the 6-month eligibility status report. The workgroup recommends that CDSS request a waiver to eliminate this major barrier to students continuing food support past 6 months. This recommendation could be further supported by a diverse workgroup of California agencies and stakeholders working with the USDA to also explore simplifying the annual verification process, in part by aligning it with annual financial aid submissions.

Federal policy action: *Federal statutory change to implement.*

3. Provide presumptive eligibility for students who are \$0 EFC eligible, participants of the FRPM program, or from a household that receives SNAP benefits.

This would include recipients of benefits funded through the TANF program or the FRPM program and recipients of the maximum Pell Grant under the new Student Aid Index (SAI). Final verification could be provided with required supplemental information. As an example, a student's FAFSA application would provide critical pieces of information that would not need to be provided again through the CalFresh application process. In the short term, students would continue to submit a CalFresh application. Implementing this recommendation would be a critical step toward the design of a system that would require students to submit only a single application that could be facilitated through collaboration between counties and institutions of higher education.

Federal policy action: *Federal statutory change to implement.*

CONCLUSION

In September 2019, one in three California postsecondary students reported experiencing food insecurity in any given month.³⁵ The onset of the COVID-19 pandemic in spring 2020 has only exacerbated the situation. The CSAC CalFresh workgroup's efforts from September 2020 to April 2021 served as a meaningful inquiry into how state and local government agencies can shift their policies and practices in a manner that would directly benefit and support students in their efforts to improve their own social and economic standing. Students should not be burdened by having to take time and attention away from their studies to secure consistent access to nutritious food. The student population in particular needs support from various systems that make it easy, efficient, and seamless to gain access to a benefit they are eligible to receive.

Together, the short-term and long-term recommendations presented in this report have the potential to transform the CalFresh experience for California postsecondary students by removing outdated roadblocks, aligning to existing systems, and creating a statewide system for students specifically. Importantly, this report highlights that there is not a single entity or institution that is responsible for or holds the power to dramatically improve the CalFresh experience for students. Being able to accomplish providing a significantly higher proportion of eligible students with the CalFresh benefit will require the cooperation, collaboration, and communication of various government institutions in creating a simpler, more modernized, and more standardized process.

To that end, the recommendations offer specificity regarding the type of action necessary, the level of government at which action is required, and, where applicable, the institution(s) that should be involved. The intent of this report is to facilitate creating a CalFresh system that is truly responsive to the student experience and that helps every California postsecondary student move one step closer to successfully completing their postsecondary education. This report can serve as a roadmap for how to eliminate barriers to CalFresh access for students in the near term while pursuing other reforms that will take more time. In addition, implementing the recommendations in this report can help create a roadmap for the application of other benefits for eligible students in the future.

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APPENDIX A: WORKGROUP MEMBERSHIP

Workgroup members were selected based on their expertise, skill, insight, and interest in contributing to a productive and solution-oriented engagement over the 9-month period of the workgroup.

CSAC Commissioners

- » Catalina Cifuentes, Executive Director, Riverside County Office of Education
- » Jessica Bartholow, Policy Advocate, Western Center on Law & Poverty³⁶

CSAC Staff

- » Marlene Garcia, Executive Director, CSAC
- » Catalina Mistler, Chief Deputy Director, CSAC
- » Jake Brymner, Director of Government & External Relations, CSAC
- » Melissa Bardo, Legislative Analyst, CSAC (now with California Community Colleges Chancellor's Office)

California State Legislative Staff

- » Jeanice Warden-Washington, Chief Consultant, Assembly Higher Education Committee³⁷
- » Mark Martin, Consultant, Assembly Budget Subcommittee No. 2 on Education Finance
- » Gail Gronert, Special Assistant to the Assembly Speaker, Human Services
- » Olgalilia Ramirez, Principal Consultant, Senate Education Committee
- » Lisa Qing, Fiscal and Policy Analyst, Legislative Analyst's Office

Other State Agency Staff

- » Alexis Fernández, Bureau Chief, CalFresh and Nutrition Branch, CDSS (now with Code for America)
- » Cassandra Wagner, Staff Services Manager, Policy Bureau, CDSS
- » Natasha Nicolai, Chief Data Strategist, CDSS
- » Kim Frinzell, Director of Nutrition Services Division, CDE

Researchers

- » Jesse Rothstein, Faculty Director, California Policy Lab, UC Berkeley
- » Anna Doherty, Research Manager, California Policy Lab, UC Berkeley
- » Hayley Weddle, Postdoctoral Researcher, UC San Diego

Practitioners and Local Representatives

- » Noemi Ramirez, CalFresh Specialist, CSU San Marcos
- » Ruben Canedo, Director of Strategic Equity Initiatives, UC Berkeley
- » Keith Curry, President, Compton Community College
- » David O'Brien, California Community College Chancellor's Office

³⁶ Commissioner Bartholow became a public member of the workgroup upon her departure from serving on the CSAC in January 2021.

³⁷ Ellen Cesaretti-Monroy served as the alternate for Jeanice Warden-Washington when she was not available.

APPENDIX B: WORKGROUP MEETING DATES

Members of the workgroup met over an 8-month period between fall 2020 and spring 2021 for approximately 2 to 3 hours at a time. The meeting agendas were built in an iterative manner with topics that included raising greater awareness of available benefits, addressing the efficacy and efficiency of the process, and carrying forward effective changes in the policy. This approach of sequencing topics within the allotted time for the workgroup allowed the workgroup to cover the current state of the program and uncover opportunities for improving the policy, process, and implementation of access to CalFresh benefits for California's postsecondary students. The dates that the workgroup convened are as follows:

- » September 11, 2020
- » October 30, 2020
- » November 20, 2020
- » December 17, 2020
- » January 15, 2021
- » February 19, 2021
- » March 19, 2021
- » April 16, 2021

APPENDIX C: ACTIONS BY THE STATE OF CALIFORNIA TO ALLEVIATE STUDENT BASIC NEEDS

Chaptered in 2014, Assembly Bill 1930, authored by Assembly Member Nancy Skinner, required CDSS to establish a workgroup to identify which “state or local job training programs” would exempt a college student from the student work rule. Additionally, it required that the CDSS issue guidance to counties about how to identify and verify participation in one of these programs. The workgroup, established in May 2015, went one step further and issued guidance to counties about how to verify some of the other exemptions to the student eligibility rule. The policies subsequently established were explained in ACLs, one of which included a checklist for advocates and counties to assist postsecondary students in screening for exemptions. AB 214 codified this work and requires CDSS to establish a process to identify programs that qualify students for exemptions.³⁸

Electronic Benefit Transfer on College Campuses

Even as more eligible students are being enrolled in the CalFresh program, many of them will find it difficult to use the benefits because of a lack of access to food retailers on campus that accept EBT. There are three ways in which college campuses can provide food retailers that can accept EBT: have restaurants and stores participate in the CalFresh Restaurant Meals Program (RMP), have stores become an approved SNAP retailer, and bring farmers markets that accept EBT to campus

Pantries Are on Every Public College Campus in California

With 3 years of budget investments in the Hunger Free Campus Initiative, the California legislature can be proud of the fact that every single public college in California now has a place where students can go to secure emergency food, either a food pantry or a regular free food distribution on campus. These resources are available to students regardless of their CalFresh eligibility or application status and serve as a place where students can learn more about other anti-hunger services and supports. They can also meet other students who are struggling with hunger or homelessness to establish the kinds of informal support networks needed for a low-income student.³⁹

38 Western Center on Law & Poverty. (2020, February). *Addressing college student hunger in California: A whitepaper detailing efforts to date*. https://wclp.org/wp-content/uploads/2020/02/CollegeHungerWhitePaper_Feb2020_Final.pdf

39 There is no single place where a California public college student can go to learn of a pantry on campus, but most campuses post the hours and location of their pantry distributions online.

Food Sharing or Food Vouchers Available at Every UC and CSU Campus

To be awarded funding through the Hunger Free Campus Initiative, UC and CSU campuses had to establish a food sharing program or an emergency meal voucher program and advertise how a student would be eligible for this short-term, emergency assistance. All campuses have confirmed that they administer such a program through their cafeteria programs.

California recently took further steps to address the challenge of postsecondary students gaining access to basic needs, including the February 2021 special budget action and provisions included in the Budget Act of 2021. The February 2021 special budget action included the following actions:

- » \$6 million to support outreach and application assistance to UC, CSU, and California community college students made newly eligible for CalFresh from provisions included in federal legislation enacted in December 2020 that allow students with \$0 EFC to apply.
- » \$12 million in state funds to support associated county administrative workload.

In addition to increased funding to support public services in K–12 education, higher education, and student aid, this legislation ushered in policy changes that advance and complement many of the recommendations and actions discussed by the workgroup and put forward in this report. Namely among them, the Budget Act of 2021 took actions to

- » begin implementing expansion of state-funded nutrition benefits to those who are ineligible for CalFresh or the California Food Assistance Program solely because of immigration status,⁴⁰
- » increase funding from General Fund sources for county administration of CalFresh by approximately 2.3 percent to a total of \$683.9 million in 2021–2022 because of increased caseload projections for county eligibility workers enrolling CalFresh eligible Californians,⁴¹ and
- » provide \$30 million in ongoing funding to the California community colleges to establish basic-needs centers on every college campus to be staffed by a basic-needs coordinator.

These policy and budget actions by California policymakers represent an initial step forward in achieving greater levels of effectiveness and efficiency in delivering food security to tens of thousands of students in California's postsecondary institutions.

40 California State Legislature. (2021). *The 2021–2022 state budget June 28th package*. <https://sbud.senate.ca.gov/sites/sbud.senate.ca.gov/files/June%2028th%20Package%20Summary%20Final.pdf>

41 County Welfare Directors Association of California. (2021, June 2). *FY 2021–22 state budget issues*. https://www.cwda.org/sites/main/files/file-attachments/2021-22_budget_tracking_list_6.23.pdf?1622819695

APPENDIX D: CRITERIA FOR EXEMPTION OF A POSTSECONDARY STUDENT FROM THE SNAP STUDENT ELIGIBILITY RULE

The following information is adapted from Legal Services of Northern California (2022), [*LSNC Guide to CalFresh Benefits*](#).

Demonstrated Working Status

(MPP § 63-406.216; ACL 12-37; ACL 17-97; ACIN I-66-16): “Receiving” means when the student is approved for state or federal work-study for the current school term, anticipates working during the term, and has not refused a work assignment (ACL 17-05; ACIN I-89-15). This exemption applies even if a work-study job assignment has not yet begun or is not available. The exemption begins the month the school term starts, or the month work-study is approved, whichever is later. The exemption continues until the end of the month the school term ends (MPP § 63-406.212). CDSS has created a form letter that colleges can use to verify work-study approval (ACL 20-114).

Individual Family Circumstances

(ACL 15-70): The CSAC is required to provide written notification to recipients of Cal Grant A or B awards regarding their potential eligibility for CalFresh (ACL 18-27). The TANF program, which is time limited, assists families with children when the parents or other responsible relatives cannot provide for the family’s basic needs. The federal government provides grants to states to run the TANF program (ACL 17-05). Students with children are (a) a full-time student with a child under age 12, (b) a part-time student with a child under age 6 or a child between ages 6 and 12 for which care is not available, or (c) receiving CalWORKs. See ACIN I-36-12 for treatment of applicants declaring intent not to re-enroll (7 C.F.R. § 273.5(c)).

Employment/Training Program

Enrolled in a CalFresh employment and training program, or in other state or local job training programs that USDA will accept (7 C.F.R. § 273.5(b)(11)). Enrolled in a program to increase the student’s employability, including programs for low-income students that are operated by a state or local government in which one or more of the components of the program are equivalent to an employment and training component (7 C.F.R. § 273.5(b)(11)). Enrolled in a program to increase employability for current and former foster youth, including Guardian Scholars Program, Foster Youth Success Initiative, Cooperating Agencies Foster Youth Educational Support, Chafee Education and Training Voucher (ETV) Program, and Extended Foster Care (ACL 17-05). Enrolled in a Workforce Innovation and Opportunities Act program (MPP § 63-406.216; ACL 15-70).