

SNAP Participation Among College Students: Unclaimed Benefits and the Role of State Investment

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SHEEO *Public Investment in Higher Education: Research, Strategies, and Policy Implications* Webinar Series, “Strategic Finance for Higher Education” session

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Introduction

Students, advocates, and policymakers alike have identified [food insecurity among college students](#) as an impediment to the nation’s postsecondary attainment ambitions and a financial crisis disproportionately befalling low-income students and students of color.² With state budgets likely to be constrained for years by [the ongoing impacts of the COVID-19 pandemic](#),³ maximizing students’ receipt of federal food benefits must be a policy priority for state lawmakers concerned with student hunger.

This paper examines the levels and causes of college students’ under-participation in the Supplemental Nutrition Assistance Program (SNAP), which likely results in billions of dollars in federal benefits going unclaimed every year. Using California as a case study, it leverages a recent report commissioned by the California legislature to provide an estimate of the state’s SNAP participation rate among college students that accounts for the numerous eligibility criteria affecting student eligibility. These estimates suggest that, prior to the pandemic, as much as \$100 million per month in California was left unclaimed by college students. The paper then considers the role of public investment by state governments to promote greater participation in SNAP among college students.

College Students’ SNAP Eligibility and Participation

A longstanding federal benefit program, SNAP is one of the nation’s most versatile and essential tools against hunger in the United States. Before the COVID-19 pandemic, SNAP delivered [an average of \\$125 per participant per month](#)⁴ to about [38 million participants per year](#).⁵ Following Congressional relief legislation passed in 2020, [participating households in](#)

¹ Jennifer Mishory left The Century Foundation prior to the writing of this manuscript, but she provided supervision over the course of this research project. Any errors within this manuscript can be attributed to Peter Granville.

² Nicholas Freudenberg, Sara Goldrick-Rab, and Janet Poppendieck, “College Students and SNAP: The New Face of Food Insecurity in the United States,” *American Journal of Public Health*, 109 (12), December 2019, pages 1652-1658, <https://doi.org/10.2105/AJPH.2019.305332>.

³ Louise Sheiner and Sophia Campbell, “How much is COVID-19 hurting state and local revenues?,” Washington, D.C.: The Brookings Institution, September 2020, accessed March 2021, <https://www.brookings.edu/blog/up-front/2020/09/24/how-much-is-covid-19-hurting-state-and-local-revenues/>.

⁴ “A Quick Guide to SNAP Eligibility and Benefits,” Washington, D.C.: The Center on Budget and Policy Priorities, updated September 2020, accessed March 2021, <https://www.cbpp.org/research/food-assistance/a-quick-guide-to-snap-eligibility-and-benefits>.

⁵ Lauren Hall, “A Closer Look at Who Benefits from SNAP: State-by-State Fact Sheets,” Washington, D.C.: The Center on Budget and Policy Priorities, updated January 2021, accessed March 2021,

[most states receive 115% of what was previously the maximum amount](#), \$196 per person in a four-person household.⁶ [SNAP is not intended to \(nor designed to\) completely cover a participant's food budget](#),⁷ but it can be a critical lifeline for a student with no other recourse.

SNAP could, in theory, serve as a major source of assistance for low-income college students. However, the program features a complex set of additional eligibility criteria for college students on top of the eligibility criteria for the general public. By default, a student enrolled at least half-time at a postsecondary institution is *ineligible* for SNAP: this is called the “SNAP student eligibility rule” for short. An exception is made for a student who [demonstrates one of eleven possible exemptions](#), such as certain parental statuses and employment for at least twenty hours per week.⁸ Congressional leaders designed this rule more than forty years ago [on the assumption that college students are typically young, have no dependents, and derive financial security through their families](#).⁹ In a break from precedent, Congress added [two additional exemptions](#) in December 2020 applying to students who have an Expected Family Contribution (EFC) of \$0 and students who are eligible to participate in a federal or state work-study program.¹⁰ These temporary exemptions will last until 30 days after the COVID-19 public health emergency declaration is lifted.

Despite the recent addition of these two exemptions, dissimilarities between SNAP and traditional financial aid have prevented integration of the SNAP application process into the federal financial aid application (i.e. FAFSA) process. Unlike traditional financial aid, SNAP benefits are allocated monthly rather than annually, and a person’s eligibility can fluctuate month-to-month. SNAP benefits are also delivered at the level of the household rather than the individual, and it matters for SNAP eligibility who the student buys groceries and prepares meals with; financial aid is traditionally agnostic to this. Because the FAFSA and the SNAP application cannot be combined, students may experience application fatigue as they navigate repeated hurdles for aid.

This is one reason SNAP would likely be under-utilized by college students, but it is not the only one. SNAP participants must regularly recertify their eligibility, and research has shown

<https://www.cbpp.org/research/food-assistance/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets#Alabama>.

⁶ Casey McConnell, “SNAP – Temporary Increase in Maximum Allotments due to COVID-19,” Washington, D.C.: U.S. Department of Agriculture, Food and Nutrition Service, revised December 2021, accessed March 2021, <https://www.fns.usda.gov/snap/temporary-increase-maximum-allotments-due-covid-19-revised-12282020>.

⁷ Mallory Moench, “Study shows SNAP benefits don’t cover most meal costs in US,” *Associated Press News*, February 2018, accessed March 2021, <https://apnews.com/article/e07b127e984744fc8f51bb38806a4d51>.

⁸ See 7 CFR §273.5, *Electronic Code of Federal Regulations*, accessed March 2021, https://www.ecfr.gov/cgi-bin/text-idx?SID=e008ca638e9d29cbb24b66a3684b2c5d&mc=true&node=pt7.4.273&rgn=div5#se7.4.273_15.

⁹ Rachel Treisman, “New SNAP rule impacts college students by limiting benefits and adding confusion,” *National Public Radio*, December 2019, accessed March 2021, <https://www.npr.org/2019/12/21/789295697/new-snap-rule-impacts-college-students-by-limiting-benefits-and-adding-confusion>.

¹⁰ Sasha Gersten-Paal, “SNAP Student Provisions in the Consolidated Appropriations Act, 2021 – Questions and Answers – Section 702(e),” Washington, D.C.: U.S. Department of Agriculture, Food and Nutrition Service, February 2021, accessed March 2021, <https://www.fns.usda.gov/snap/student-provisions-consolidated-appropriations-act-2021-qars>.

that the administrative burden of the recertification of eligibility leads to decreases in participation.¹¹ Misinformation is also a significant barrier to program participation:¹² the Government Accountability Office has found that many students and university administrators alike are misinformed about how the student eligibility rules work and whether college students can receive SNAP benefits at all.¹³ The stigma of receiving government assistance is yet another barrier.¹⁴

The Department of Agriculture (U.S.D.A.) estimates that, in the general population, [84% of SNAP-eligible people participated in the program in Fiscal Year 2017](#).¹⁵ Determining the participation rate for college students, however, faces two challenges of data availability. The numerator—the number of college students receiving benefits—is seldom reported by states. The denominator—the number of college students eligible for benefits—depends on the numerous factors described above, from enrollment intensity to weekly hours worked to parental statuses and more.

The American Community Survey (ACS), the U.S. Census Bureau's annual supplement to the decennial census, enables a partial view into this participation rate. Publicly available microdata indicate whether an ACS respondent is enrolled in college, how many hours of work they work weekly, whether their household participates in SNAP, and their income. Using these data, [Allison \(2018\) estimates that in 2015](#) about 18% of college students worked at least part-time and had incomes under 130% of federal poverty,¹⁶ and only 18% of *these* students received SNAP benefits.¹⁷ By Allison's estimates, this corresponds to approximately \$4.2 billion in unclaimed federal resources per year.

¹¹ Tatiana Homonoff & Jason Somerville, "Program Recertification Costs: Evidence from SNAP," National Bureau of Economic Research Working Paper #27311, June 2020, accessed March 2021, <https://www.nber.org/papers/w27311>.

¹² For example, in one survey of adults attending a community serving organization for New York Latinx American families, respondents were 85% less likely to have enrolled in SNAP if they have heard the false rumor that participating in SNAP/WIC makes undocumented family members vulnerable to being reported. Debra J. Pelto, Alex Ocampo, Olga Garduño-Ortega, Claudia Teresa Barraza López, Francesca Macaluso, Julia Ramirez, Javier González, and Francesca Gany, "The Nutrition Benefits Participation Gap: Barriers to Uptake of SNAP and WIC Among Latinx American Immigrant Families," *Journal of Community Health*, 45 (2020), October 2019, pages 488-491, <https://link.springer.com/article/10.1007/s10900-019-00765-z>.

¹³ "Food insecurity: better information could help eligible college students access federal food assistance benefits," Washington, D.C.: U.S. Government Accountability Office, December 2018, accessed March 2021, <https://www.gao.gov/assets/700/696254.pdf>.

¹⁴ Kathleen S. Gorman, Allison M. Smith, Maria E. Cimini, Katherine M. Halloran, and Anna G. Lubiner, "Reaching the Hard to Reach: Lessons Learned from a Statewide Outreach Initiative," *Journal of Community Practice*, 21 (1-2), May 2013, pages 105-123, <https://doi.org/10.1080/10705422.2013.788369>

¹⁵ Karen Cunyngnam, "Reaching Those In Need: Estimates of State Supplemental Nutrition Assistance Program Participation Rates in 2017," Washington, D.C.: U.S. Department of Agriculture, August 2020, accessed March 2021, <https://fns-prod.azureedge.net/sites/default/files/resource-files/Reaching2017-1.pdf>.

¹⁶ 130% of the federal poverty limit is the minimum income threshold for SNAP eligibility outlined by federal law. States have flexibilities to deem some households with higher incomes eligible.

¹⁷ Tom Allison, "Rethinking SNAP Benefits for College Students," Washington, D.C.: Young Invincibles, February 2018, <https://vtechworks.lib.vt.edu/bitstream/handle/10919/84072/SNAPBenefitsCollegeStudents.pdf?sequence=1&isAllowed=y>

As a data source for college students' SNAP participation rates, the ACS is limited in that it does not capture data on more than a few exemptions for students, and there is the possibility of false positives for SNAP participation for households that are counted as one household under ACS and would be treated as multiple households under SNAP.¹⁸

Another helpful data source is the National Postsecondary Student Aid Survey (NPSAS), a quadrennial survey of college students conducted by the National Center for Education Statistics. NPSAS features variables that correspond to several exemptions, including working 20+ hours per week, certain parental statuses, and having a work-study job. In addition, NPSAS imports respondents' FAFSA data, which can serve as a proxy for the income information students would use when applying for SNAP.¹⁹ However, NPSAS is not a strong tool for estimating the numerator of the participation rate, as it lacks information on respondents' participation in SNAP while enrolled in college.²⁰

A recent data release from California helps to fill in the data gaps in NPSAS and the ACS, enabling a snapshot of one state's SNAP participation rate among undergraduate college students. In the following section, we describe the methodology for this analysis and the resultant participation rate.²¹ If these results mirror national figures, then these results suggest that SNAP participation among eligible college students who are subject to the complex student eligibility rules may be even lower than previously estimated, and it underscores the scale of benefits left unclaimed every year.

Estimating the SNAP Participation Rate in California, 2018-19

In 2019, the California legislature passed [Senate Bill 77](#) and commissioned the California Department of Social Services (CDSS) to report the number of college students participating in SNAP (known as CalFresh in California). The bill also required CDSS to consult with the University of California (UC), California State University (CSU), and the California Community College system (CCCs) to develop an estimate of the number of public postsecondary students who are eligible to receive CalFresh benefits.²²

¹⁸ For example, consider an apartment in which three college students live and exactly one participates in SNAP. Assuming that all three buy groceries and prepare meals independently of each other, then each of the three would be treated under SNAP as a separate household of one. However, the ACS would count the apartment as one household, and if one member receives SNAP benefit, then all three would be listed in the ACS as a member of a household receiving SNAP benefits. This would result in one true positive and two false positives for SNAP participation.

¹⁹ This is not a perfect proxy: it uses the poverty level of a student's FAFSA household at the time of their FAFSA submission as a substitute for the poverty level of the student's SNAP household at the time of their SNAP application.

²⁰ NPSAS features a variable for receipt of SNAP benefit, but this reflects SNAP receipt at the time of FAFSA completion, which for many students is not the same household as they are living in when they are enrolled in college.

²¹ This analysis does not attempt to measure SNAP participation during the COVID-19 pandemic, which has seen significant changes to college enrollment patterns, employment, and family finances, as well as temporary revisions to the student eligibility system itself.

²² California State Senate, Senate Bill 77 of 2019, approved July 2019, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200SB77.

The [SB 77 CalFresh Student Data Report](#), released by CDSS the following year, reports that the annualized average number of California college students enrolled in SNAP in 2018-19 is 127,360.²³ This represents the number of students who were subject to the student eligibility rule, were found to demonstrate an exemption, and also met all other eligibility criteria.²⁴ College students who are not subject to the student eligibility rule, such as those enrolled less than half-time, are not included in this total.

CDSS was not able to break down this 127,360 by postsecondary sector (public vs. private) or postsecondary level (undergraduate vs. graduate). However, ACS provides data on household-level SNAP participation and, for college students, the student's level of college enrollment and whether it is a public or private institution. We used the 1-Year ACS Public Use Microdata Sample (PUMS) for 2018 to estimate the percentage distribution of California college students in SNAP-enrolled households by level and by sector, and we then applied this distribution to the 127,360 figure.²⁵ This leads to the following subtotals by level and sector:

Table 1:

<i>Estimated California students subject to the student eligibility rule who are enrolled in CalFresh (2018-19)</i>	Undergraduate students	Graduate students
Public institutions	104,777	6,184
Private institutions	12,800	3,599

The analysis in this section is primarily concerned with the SNAP participation rate among undergraduate students, and the estimates in the left column of Table 1 (104,77 and 12,800) serve as the numerator for the estimated participation rate.

Obtaining estimates of the number of *eligible* college students is more complicated. In California, only students who are enrolled at least half-time and are 18-49 are subject to the student eligibility rule.²⁶ One exemption is sufficient, but there are various exemptions a student could demonstrate.

The NPSAS 2016 Undergraduate Survey²⁷ includes variables that correspond relatively closely to a subset of exemptions, such as hours worked per week and information on students'

²³ "Senate Bill 77 CalFresh Student Data Report," Sacramento, CA: California Department of Social Services, June 2020, accessed March 2021, <https://www.cdss.ca.gov/Portals/9/Leg/202006-SB-77-CalFresh-Student-Data-Report.pdf>.

²⁴ "Annualized average" weights the headcount of individuals by the length of time within the year that the student was enrolled in SNAP.

²⁵ Because the ACS does not take into account whether a student is enrolled at least half-time (which determines whether they are subject to the student eligibility rule), we only use the *distribution* of the students recorded in ACS as being in SNAP households, rather than the total numbers of these students according to ACS.

²⁶ In [federal SNAP regulations](#) (7 CFR §273.5), being under 18 years old or over 49 years old is considered an exemption from the rule. California, by contrast, treats age not as an exemption but as a component of the definition of "college student." In practice these are functionally equivalent, but the distinction must be accounted for in this analysis when using NPSAS variables.

²⁷ Due to the timing of the releases of NPSAS, the release reflecting 2015-16 is the most recent available, and this analysis treats the year 2015-16 as a proxy for the year 2018-19.

statuses as parents. In addition, the SB 77 Data Report features the total number of undergraduate students identified by the UC, CSU, and CCC systems to be holding an exemption for each of four exemptions. These totals from CDSS fill in some of the gaps left by NPSAS, and these two sources as a pair cover all but two of the eleven exemptions.²⁸ When generating these totals the UC and CSU filtered by enrollment intensity (at least half-time) and age (18-49). To account for enrollment intensity and age at the CCCs, we multiplied the CCC totals in the SB 77 Data Report by the percentage of CCC students who are enrolled at least half-time and are aged 18-49.²⁹

Table 2 lists the exemptions we used in our analysis, by data source.³⁰

Table 2:

Data source	Exemptions
CDSS SB 77 Data Report	<ul style="list-style-type: none"> - Has a disability - Approved for work-study (data only available for UC and CSU)³¹ - In a program to increase employability - Receive a TANF-funded Cal Grant - Receive CalWORKS (i.e. TANF)
NPSAS:16 Undergraduate Survey	<ul style="list-style-type: none"> - Work 20+ hours per week (not including work study) - Qualify for a parental exemption (covers three of the eleven exemptions listed under federal regulations) - Have a work-study job (used for private institutions and community colleges)

Acknowledging a large number of caveats (see below), we took the following approach to estimating the number of California undergraduate students who are subject to the student eligibility rule and are CalFresh-eligible:

- **(1)** To estimate the number of undergraduates who are subject to the student eligibility rule, we took the percentage of in-state California students³² who are enrolled at least

²⁸ Of [the eleven exemptions provided under federal regulations](#), the two that could not be at all approached by either the SB 77 Data Report or NPSAS are for students who are “enrolled as a result of participation in the Job Opportunities and Basic Skills program under Title IV of the Social Security Act or its successor program” (7 CFR §273.5(b)(4)), i.e. a TANF JOBS program, and for students who are participating in an on-the-job training program (7 CFR §273.5(b)(7)).

²⁹ Given that the CCC system was not able to account for enrollment intensity and age in their data pulls, this is the best available adjustment, though it is not an ideal one.

³⁰ For context, the full list of exemptions in federal regulations is Section 273.5(b) [here](#). Based on our knowledge of how California applies the regulations we feel fairly confident that the remaining exemptions that can’t be approximated by the CDSS report or by NPSAS represent a negligibly small share of students. One of the exemptions in federal regulations, which is based on age, is already accounted for in how California defines a student who is subject to the rule (see footnote 26).

³¹ California interprets the federal regulations to say that any student who is *approved* for work-study is eligible for the exemption. NPSAS does not track whether a student is approved for work-study, merely whether they held a work-study job. Given the data limitations, this is an imperfect proxy for approval for work-study.

³² The use of an in-state filter is necessitated by the fact that there is no filter in NPSAS for the U.S. state in which the student is enrolled.

half-time and who are 18-49 for each of three sectors: the community colleges, public four-years, and private institutions. We then applied this percentage to total headcount undergraduate enrollment in 2018-19, derived from the Integrated Postsecondary Education Data System (IPEDS), to obtain the sector-level estimates of undergraduates subject to the student eligibility rule [Y].

- **(2)** For each exemption whose sector-level total was provided by CDSS, we divided the total by [Y] to get the percentages of undergraduates who are subject to the student rule and who meet the exemption. For sectors where data was unavailable, such as for private institutions, we imputed a percentage based on the available sector-level percentages.
- **(3)** For each exemption that we approached using NPSAS, we first filtered for in-state California students enrolled at least half-time and aged 18-49, and we then recorded the percentage of students who meet the exemption, e.g. the percentage of students working 20+ hours per week (not including work-study).
- **(4)** We then take each of these percentages and subtract it from 1, to obtain the estimated percentage who *do not* meet the exemption. We then multiply these percentages together to estimate the estimated percentage who do not have *any* exemption. We then subtract this percentage from 1 to obtain the estimated percentage who have at least one exemption. Multiplying this number by [Y] for each sector is our estimate of the number of students who are subject to the student eligibility rule and have at least one exemption [Z].
- **(5)** Lastly, we accounted for two other important criteria for CalFresh eligibility: income and citizenship. Using NPSAS, we found the percentage of undergraduate students by sector who are subject to the student rule and who have incomes under 200% of federal poverty (which qualifies a student for categorical eligibility in California) and who are U.S. citizens. We multiplied these by the student totals produced by step 4 [Z].

This leads to the following estimates in Table 3:

Table 3:

<i>Sector</i>	<i>Estimated California undergraduate students subject to the student eligibility rule who are likely eligible for CalFresh (2018-19)</i>
Community colleges	580,568
Public universities	176,263
Private institutions ³³	176,431

With the values in Table 1 serving as our numerator and the values in Table 3 serving as our denominator, we thus obtain the following participation rate estimates. (Because data from

³³ It is purely coincidental (and not an error) that the estimates for public universities and for private institutions are nearly equal.

the ACS is used here and ACS does not distinguish between two-year and four-year institutions, the rows for community colleges and public universities are combined.)

Table 4:

<i>Sector</i>	<i>Estimated CalFresh participation rate among eligible undergraduate students subject to the student eligibility rule (2018-19)</i>
Public institutions	104,777 / 756,831 = 13.8%
Private institutions	12,800 / 176,431 = 7.3%
All institutions	117,577 / 933,262 = 12.6%

This analysis depends on certain assumptions, the most tenuous assumption being that these exemptions represent statistically independent factors. In reality, they are likely not independent: for example, it is almost certainly true that a student who works 20+ hours per week is more likely than other students to be approved for work-study, and vice versa. As a check on this assumption, we used the national NPSAS sample³⁴ and controlled for the previous exemptions when estimating each next one; this is not possible while filtering for California students due to sample size constraints, but it is feasible when using the national sample. The results did not significantly vary from the results obtained when treating these variables as statistically independent for California students: 12.3% for public undergraduates compared to the baseline estimate of 13.8%.

Another limitation is that NPSAS is a sample, not a census, and it is uncertain how well the sample estimates reflect the population. To get a sense of the scale of uncertainty, we recorded the lower and upper bounds of the 95% confidence interval for every NPSAS statistic we used. We then selected the set of bounds that produces the largest-possible participation rate and found this maximized rate. We then selected the set of bounds that produces the smallest-possible participation rate and found this minimized rate. Compared to the baseline estimate of 13.8% for public undergraduates, the minimized rate is 12.7% and the maximized rate is 15.3%. We find this level of confidence sufficient for our purposes, which is primarily to illustrate that the participation rate for college students is concerningly far below the 84% rate of the general public.

These estimates of the SNAP participation rate among eligible California undergraduate students subject to the student eligibility rule are not far from the national [18% rate estimated by Allison \(2018\)](#) using the ACS.³⁵ The lower findings here may reflect differences in methodology or state context; regardless, they add further evidence that SNAP is not being accessed by a substantial share of eligible students. According to the baseline estimates presented here, there exists a population of roughly 815,685 California undergraduate students who are subject to the student eligibility rules and would likely be approved if they applied yet are not receiving these

³⁴ We maintained the in-state enrollment filter but removed the “State of residence = California” filter.

³⁵ Tom Allison, “Rethinking SNAP Benefits for College Students,” Washington, D.C.: Young Invincibles, February 2018, <https://vtechworks.lib.vt.edu/bitstream/handle/10919/84072/SNAPBenefitsCollegeStudents.pdf?sequence=1&isAllowed=y>.

benefits: if they all received the pre-pandemic monthly average of \$125, then the state would see \$100 million in new federal money flow to its students *every month*.³⁶ It stands to reason that other states are in a similar position.

Policy Solutions and the Role of State Investment

The lack of transparency and predictability surrounding eligibility is likely a major contributor to the under-participation of college students in SNAP. It follows that revision or elimination of the SNAP student rule would likely reduce under-participation among college students to a significant degree. However, the power to enact such changes rests solely with Congress. Until such changes are made, state legislators must look to alternative policy options.

Policymakers have a large menu of options to improve the accessibility of SNAP for college students.³⁷ Some pose virtually no costs to states, such as recent examples of state SNAP agencies maximizing the number of postsecondary programs that are approved to convey an exemption to participating students.³⁸ States can also work to modernize and streamline their application systems, which pose upfront one-time costs. These are both important and necessary tasks for state governments.

This section will examine a third factor, the role of ongoing public investment to increase SNAP participation among college students. In the past five years, at least two states have begun making investments through the public higher education appropriations process to encourage institutions to inform students about SNAP and support students through the application, with similar legislation introduced in others.

In 2017, Governor Jerry Brown of California signed [Senate Bill 85](#), which contained provisions that are known as the Hunger Free Campus legislation. The bill designates as a “hunger free campus” any community college or public university campus that has a specified employee charged with helping ensure students have the information needed to enroll in CalFresh; an on-campus food pantry or regular food distributions on campus; and, for the UC and CSU, a program for the sharing of unused meal credits. The bill allocated \$7.5 million to qualifying campuses, and since then the legislature has appropriated at least \$47 million to

³⁶ This is not to mention (1) the boost to monthly benefits provided under the Families First Coronavirus Response Act, which potentially raises the average monthly benefit by 50% or more, as well as (2) the additional students who are newly eligible for SNAP thanks to Congress’s temporary provisions enacted in December, which may be upwards of 3 million students. See Peter Granville, “Congress Made 3 Million College Students Newly Eligible for SNAP Food Aid. Here’s What Must Come Next,” New York, NY: The Century Foundation, <https://tcf.org/content/commentary/congress-made-3-million-college-students-newly-eligible-snap-food-aid-heres-must-come-next/>.

³⁷ Nicholas Freudenberg, Sara Goldrick-Rab, and Janet Poppendieck, “College Students and SNAP: The New Face of Food Insecurity in the United States,” *American Journal of Public Health*, 109 (12), December 2019, pages 1652-1658, <https://doi.org/10.2105/AJPH.2019.305332>.

³⁸ Abigail Seldin and Carrie Welton, “College students are going hungry — states can help,” *The Hill*, November 2020, accessed March 2021, <https://thehill.com/opinion/education/526989-college-kids-are-going-hungry-states-can-help>.

address basic needs insecurity at public institutions.³⁹ In 2019, Governor Phil Murphy of New Jersey signed [Assembly Bill 4702](#), which makes similar designations and appropriates \$1 million. Also in 2019, [SF2415](#) in Minnesota established Hunger Free Campus designations for community colleges and technical colleges but allocated no funding.

These Hunger Free Campus laws mark an important development in student food security efforts and state higher education investment. According to the nonprofit Swipe Out Hunger, California's bill marked the first instance of state funding for higher education explicitly targeting students' basic need insecurity.⁴⁰ Since the passage of the bills in California, New Jersey, and Minnesota, five states—[Maryland](#), [Massachusetts](#), [New York](#), [North Carolina](#), and [Pennsylvania](#)—have seen Hunger Free Campus bills introduced.⁴¹

The primary impact of Hunger Free Campus legislation on SNAP participation would likely result from having a designated campus staff member inform students about the program and assist them with the application. Experimental evidence indicates that providing information about SNAP alone does not lead to enrollment as strongly as does information plus assistance with the form,⁴² a parallel to research on increasing FAFSA completion.⁴³

To learn about the successes of these staff members and notable barriers that they face, we sent emails to food access coordinators and food pantry managers at each of the 23 CSU campuses, asking for responses to a short list of questions.⁴⁴ This research is ongoing, however the responses received underscore that this hands-on assistance for students meets a vital need.⁴⁵

According to these responses, at least three distinguishable barriers make assistance critical:

³⁹ The total, including the \$7.5 million appropriation in 2017, is \$54.4 million. "Hunger Free Campus Bill," Los Angeles, CA: Swipe Out Hunger, n.d., accessed March 2021, <https://www.swipehunger.org/hungerfree/>.

⁴⁰ Source: personal correspondence with staff members of Swipe Out Hunger. The authors of this paper have not personally verified this.

⁴¹ A bill was recently introduced in Oregon and designed with a similar goal. [House Bill 2835 of 2021](#) would require each public institution in the state to hire a "benefits navigator" who would assist students applying for federal, state, and local benefits programs. This is another smart approach for states to consider.

Another bill, [House Bill 1893 of 2019-20 in Washington State](#), would provide a set of improvements to college students' access to SNAP benefits, but it does not include a provision to designate campus staff to assist students with the SNAP application, which is the main focus of this section.

⁴² Amy Finkelstein & Matthew J. Notowidigdo, "Take-up and targeting: Experimental evidence from SNAP," *The Quarterly Journal of Economics* 134 (3), pages 1505-1556, August 2019, <https://academic.oup.com/qje/article-abstract/134/3/1505/5484907>.

⁴³ Eric Bettinger, Bridget Terry Long, Phil Oreopoulos, and Lisa Sanbonmatsu, "The Role of Simplification and Information: Evidence from the FAFSA Experiment," *Quarterly Journal of Economics* 127 (3), pages 1205-1242, 2012, <https://academic.oup.com/qje/article-abstract/127/3/1205/1921970?redirectedFrom=fulltext>

⁴⁴ These questions are the following: (1) Thinking about the staff member designated to assist students with CalFresh applications, did the campus hire someone new as a result of the Hunger Free Campus legislation, or did it designate a current employee for this role? (2) Pre-pandemic, how significant was the demand for assistance? Has the demand changed since the pandemic began? (3) What would you say have been the most significant barriers to getting students enrolled in CalFresh? (4) Is there anything else you think I should know about your campus's approach to helping students enroll in CalFresh?

⁴⁵ Responses have been received from seven of the 23 campuses emailed.

- County offices create bottlenecks. Although applications in many states can be started online, every SNAP application must be approved by a county caseworker. There is significant variation across counties in the smoothness of this approval process: in some counties, an application will be processed on-the-spot, and in others it will take much longer. The role of technology also differs: for example, some counties still require forms to be faxed, and sometimes forms cannot be delivered when a fax machine gets jammed.
- Myths and misunderstandings can cause students not to apply. Respondents say students can be wary of applying if they believe they are taking benefits away from someone else who is more in need (which does not occur) or that receiving the benefits will negatively impact their taxes or financial aid eligibility (which is, in most cases, not true).
- SNAP policies are frequently changing. Revisions to federal law and changes to practices at the state and county level can mean that printed informational resources grow outdated quickly.

A rigorous evaluation of the effectiveness of these SNAP application assistants is outside the scope of this paper. But, given the barriers described above, it makes sense that it would help a student to have contact with a trained, knowledgeable campus staff member who is familiar with SNAP policies, practices, and the county staff who approve applications. We also hear from campus staff members that training student volunteers can help normalize the use of SNAP benefits and reduce stigma.⁴⁶

However, recall from Table 4 that there are as many as 650,000 California undergraduates at public institutions who are likely SNAP-eligible but do not receive benefits. The state's Hunger Free Campus legislation requires campuses to have one staff member designated to support students with SNAP applications (at a minimum), while the public higher education system serves more than 2.8 million students. According to [public documents](#), staff at the UC supported about 12,850 students completing SNAP applications in 2018-19.⁴⁷ (Comparable data from the CSU and CCC systems could not be found.) Though this is a valuable foundation to build on, it suggests there is still more room to grow.

Hiring a sufficient number of staff requires sufficient investment, particularly at institutions that would otherwise lack the funding to create such positions. California's lawmakers have put forth significant funding, more than \$50 million, to address basic need security since 2017. By contrast, only \$1 million per year has been appropriated by the New Jersey legislature since 2019 to support legislation that functions very similarly to California's, and Minnesota has not yet appropriated funding. Bills in Pennsylvania, Massachusetts, and

⁴⁶ One staff member shared this perspective on the role of stigma and stereotypes: "For many students, this is the first time they have been on their own and away from their parents. Many students do not know about resources to help assist them, do not know how to ask for help or do not want to ask for help in fear of taking it from others or for fear of looking weak or needy to their peers. Students may think that receiving 'food stamps' is only for a certain type of population and not them. Students often do not grasp that SNAP assistance can help them further their academic, physical, mental and social aspects of their lives and it is nothing to be ashamed of."

⁴⁷ Janet Napolitano, Report to the Joint Legislative Budget Committee, Oakland, CA: University of California Office of the President, February 2020, https://www.ucop.edu/operating-budget/files/legreports/19-20/2018-19_hunger_free_campus_legrpt.pdf.

Maryland would appropriate \$1 million, \$1 million, and \$150,000 in annual funding, respectively. Although this paper does not provide a rigorous cost analysis, we recommend that, as more states consider enacting Hunger Free Campus legislation, the precedent of initial appropriations alone should not dictate the levels of investment lawmakers make. They should, to the extent possible, assess what levels of funding would be needed to match the level of need for assistance. If this paper's estimates from California are representative of the nation overall, then upwards of 8 in 10 eligible students may be failing to receive benefits; this should indicate that the level of unmet need for information and assistance is substantial.

In addition, state lawmakers should consider all possible avenues for drawing down federal funds in support of assistance with SNAP applications. According to staff members at CSU campuses, some SNAP application assistants were already funded prior to the state's Hunger Free Campus legislation through [a grant with the California Department of Social Services](#) and the Center for Health Communities in Chico, CA. Under [7 U.S.C. 2020](#) and [7 U.S.C. 2025](#), state agencies can receive [50% federal reimbursement](#) for SNAP outreach that targets underserved groups and provides information about eligibility: as this paper has argued, college students are a prime example.⁴⁸ Higher education leaders should explore how this opportunity can be leveraged and combined with legislation such as Hunger Free Campus, potentially doubling the allocations to institutions through the federal match.

Conclusion

SNAP is one of the nation's most vital anti-poverty programs. Enrolling in SNAP is associated with an improvement in food security,⁴⁹ and research shows that it decreases the prevalence of poverty in the U.S. by about 4.4%, with particularly strong effects on child poverty.⁵⁰ However, the degree to which college students are not receiving the benefits they are entitled to—coinciding with the high rates of financial insecurity that preceded the COVID-19 pandemic and has likely been exacerbated by it—presents an urgent need for policy solutions.

This paper has presented an analysis of SNAP participation among eligible college students in California in 2018-19: these estimates suggest that hundreds of millions of dollars were left unclaimed by students in that one state alone over one year, and they underscore how the barriers to participation likely cause millions of college students to experience food insecurity who perhaps would not if they could enroll in the program. This analysis works within significant data constraints, and further exploration of the SNAP participation rate using administrative data would enable more precise estimates.

⁴⁸ "Best Practices for Creating a Federally Reimbursable SNAP Outreach Plan," Washington, D.C.: Food Research & Action Center, November 2016, <https://frac.org/wp-content/uploads/best-practice-creating-federally-reimbursable-snap-outreach-plan.pdf>.

⁴⁹ James Mabli, Jim Ohls, Lisa Dragoset, Laura Castner, and Betsy Santos, "Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security," Washington, D.C.: U.S. Department of Agriculture, Office of Policy Support, August 2013, <https://ideas.repec.org/p/mpr/mprres/69d901432c7a46779666a240a0974a5d.html>.

⁵⁰ Laura Tiehen, Dean Jolliffe, and Craig Gundersen, "Alleviating Poverty in the United States: The Critical Role of SNAP Benefits," Washington, D.C.: U.S. Department of Agriculture, Economic Research Report, April 2012, <https://ageconsearch.umn.edu/record/262233/>.

Ideally, the SNAP participation rate among eligible college students could serve as an important indicator of the extent to which state and local resources are enabling students to navigate this complex application process. However, obtaining such estimates across more states would depend on greater collection of administrative data on student exemptions or alternative measures such as student surveys.⁵¹

While low estimates of the SNAP participation rate indicate challenges, they also indicate opportunities. Investments in support for students' SNAP participation can have a multiplier effect, where each individual dollar to support SNAP outreach and assistance may translate to much more than one dollar in benefits claimed by students, which in turn produces [an outsized impact on local economic activity](#).⁵²

As they pass Fiscal Year 2022 budgets this spring and summer, state leaders should include additional funding for public institutions of higher education for SNAP outreach and application assistance. The Hunger Free Campus model appears well-designed to establish baseline frameworks for student assistance, though appropriations levels matter. Opportunities to leverage additional sources of funding, such as federal and state money allocated by state SNAP agencies for SNAP outreach, should be examined (and prioritized by higher education leaders) as another facet of this strategy.

This paper's particular focus on SNAP is not intended to downplay the importance of other campus resources such as food pantries and emergency aid. With few exceptions, international students and undocumented students cannot access SNAP; the student eligibility system leaves some low-income students with genuine need ineligible; and the SNAP application process can take weeks to complete. For these reasons, immediate and broadly-accessible food resources will continue to be a necessity.

⁵¹ To the authors' knowledge, California is the first state to collect and release such information.

⁵² Ed Bolen and Elizabeth Wolkomir, "SNAP Boosts Retailers and Local Economies," Washington, D.C.: The Center on Budget and Policy Priorities, May 28, 2020, <https://www.cbpp.org/research/food-assistance/snap-boosts-retailers-and-local-economies>.