



Using Data to Streamline Student Access to Public Benefits

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USING FAFSA DATA & REMOVING BARRIERS TO CONNECT STUDENTS TO PROGRAMS ADDRESSING BASIC NEEDS

ABOUT STUDENT DEFENSE

Hero

The National Student Legal Defense Network (Student Defense) is a non-partisan, non-profit 501(c)(3) organization that works to advance students' rights to educational opportunity and to ensure that higher education provides a launching point for economic mobility.

TRACK RECORD: USING DATA TO HELP STUDENT BORROWERS WITH DISABILITIES

TPD DISCHARGES

Under the HEA, student loan borrowers who are “totally and permanently” disabled are entitled to a discharge of federal student loans.

UNTIL AUGUST 2021

ED required individuals to apply separately for relief even after the SSA made individual determinations.

RULEMAKING PETITION

We filed a Section 553(e) Rulemaking Petition on April 19, 2021, calling on the Department to automate the process.

RESULT

Over 633,000 individuals with disabilities have now received discharges totaling more than \$18.7 billion.

Work on Student Basic Needs

Working with state and federal agencies and institutions, Student Defense is thinking creatively to find new ways to use student data to streamline access to SNAP and other public benefits.

Barriers to automating application processes include the SNAP interview requirement and income verification.

However, states have significant authority to remove barriers and simplify the enrollment processes.



COLLEGE STUDENTS ARE IN CRISIS

- February 2025 Hope Center study surveying nearly 75,000 college students across 91 institutions: 59 percent experienced either food or housing insecurity.
- April 2025 Trellis Strategies study interviewing over 53,000 undergraduates across 104 institutions: 44 percent said they had some level of food insecurity.

COLLEGE STUDENTS ARE UNDER-ENROLLED IN SNAP

- Only about 1/3 of college students who are eligible for SNAP receive those benefits.
- By contrast, the general SNAP-eligible population has an 82% participation rate.

WHY THIS MATTERS

- The struggle to access food, housing and childcare is a major barrier to college access and completion.
- When basic needs are met, students are better able to focus on academics, care for their families, complete their degrees.

OPPORTUNITY: COLLEGES CAN DO MORE

- In 2023, only 1 in 4 of surveyed institutions of higher education reported that they inform students about public benefits programs.

USING DATA TO IDENTIFY ELIGIBLE STUDENTS

- FAFSA collects financial data useful for identifying students likely eligible for benefits.
- For example, nearly all Pell Grant recipients will be eligible for SNAP.
- SNAP has regulatory barriers (e.g., interview requirements) that can prevent using the data to automate enrollment.
- However, institutions can share data with state agencies for outreach and to streamline the enrollment process.

STUDENT DEFENSE'S ADVOCACY

01

Petitioned USDA to remove the regulatory SNAP interview requirement

02

Proposed update federal guidance to expand FAFSA data sharing between institutions and SHEEOs.

03

Provided sample student consent language for institutions/agencies to allow students to opt-in to data sharing.

04

Developed proposals for colleges to expand opt-in processes during financial aid entrance counseling and course enrollment.

July 29

DOE guidance allowing use of FAFSA data for benefits outreach.

Nov. 7

Electronic Announcement clarifying permitted/prohibited FAFSA data use.

Dec. 20

Consent guidance adopting Student Defense recommendations.

FEDERAL GUIDANCE CHANGES (2024)

WHAT'S NOW PERMITTED / PROHIBITED

Institutions can share FAFSA data with state agencies for outreach to assist enrollment in federal benefit programs like SNAP.

Sharing requires prior written consent for sensitive data, including PII/tax data.

Offer multiple opt-in opportunities (FAFSA, award letters, portals).

TIMELINE OF GUIDANCE CHANGES

2023: Student Defense proposal to
DOE

July 29, 2024: DOE guidance expands
data sharing

Nov 7, 2024: Clarification on PII use
and contractors

Dec 20, 2024: Consent
guidance issued

EXPECTED IMPACTS

- Expanded outreach leading to more students informed of benefits.
- Higher benefit enrollment among eligible students.
- Improved student retention and completion rates.

REMAINING CHALLENGES

- Institutions need resources to implement outreach effectively.
- Students must be made aware of opt-in opportunities.
- State agencies must align their systems with DOE guidance.
- Evaluation needed to measure impact on student benefit uptake.

CASE STUDY: MINNESOTA

Minnesota has launched a system-wide approach to include basic needs in student success strategy and postsecondary data systems by:

- Adding food and housing insecurity metrics to student records.
- Launching data sharing partnerships with public benefit agencies; and
- Monitoring non-academic success factors to inform statewide strategies.

CASE STUDY: CALIFORNIA

California's partnership with the Hope Center led to one of the most robust datasets on basic needs insecurity, which informed legislative and funding strategies. The findings led to:

- Increased funding for basic needs centers.
- Legislative support for sustained investment
- Inspiration for other states to adopt similar strategies.



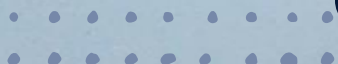
Next Steps & Call to Action

Ensure widespread institutional awareness of new guidance.

Encourage institutions to participate in data sharing to support benefits access.

Encourage institutions to track student reports of enrollment in SNAP and other public benefit programs.

Provide toolkits and technical assistance for implementation.





THANK YOU

