

Addressing College Student Hunger in California A Whitepaper Detailing Efforts to Date | February 2020

New research has emerged showing a high prevalence of food insecurity and hunger on California's College campuses. According to a recent report, the number of food banks springing up at university and college campuses is on the rise.ⁱ According to California State University (CSU), one in five CSU students experience hunger and one in ten experience homelessness.^{ii iii iv} A California Legislative Analyst Office report released in April 2019 included findings from a UC student survey in which 44 percent of undergraduates and 26 percent of graduate students reported experiencing food insecurity.^v Furthermore, research funded by the California Legislature and conducted on behalf of the California Community Colleges found that 60 percent of two-year students were housing insecure in the last year and 19 percent were homeless.^{vi} These findings are consistent with findings from other university research documenting a prevalence of hunger among college students, impeding graduation rates and learning.^{vii}

One year ago, the U.S. Government Accountability Office issued a report which analyzed over two dozen studies on food insecurity among college students and found numbers consistent with what California's public colleges have documented. They additionally concluded that about two million at-risk students who were potentially eligible for food aid through the federal government's Supplemental Nutrition Assistance Program (SNAP), known as CalFresh in California, did not receive the benefit.^{viii}

California has invested significant budget resources for the last three years and has recently implemented several pieces of legislation which seek to prevent college student hunger by increasing access to CalFresh and ensure that the benefits may be used on College Campuses. These include Assembly Bill 214 (2017)^{ix} and authored by Dr. Shirley Weber, and Assembly Bill 1930, authored by (then) Assembly Member Nancy Skinner in 2014.^x Senate Bill 173^{xi} by Senator Bill Dodd refines policies established in these earlier Assembly Bills to improve information available to Additionally, AB 453 (2017) by Assembly Member Monique Limón, to establish the Hunger Free Campus Initiative, was championed by Education Budget Chairman McCarty and funded in the 2017-18, 2018-19 and 2019-20 Budget Acts.^{xii xiii} These new laws provide the state with several new tools to draw down federal resources and aims to improve coordination between anti-hunger efforts on college campuses and anti-hunger efforts in the surrounding communities.^{xiv} This whitepaper offers a background of federal law and steps California is taking to reduce hunger on college campuses.



The CalFresh Student Rules Hinder Access to Anti-Hunger Help

One of the reasons that low-income students, like those identified in the studies referenced above, are experiencing hunger is that federal food help available to most low-income Californians has proven difficult for them to access. Though the federal SNAP program is still the most important anti-hunger program for low-income people nationally and in California, federal law denies eligibility to a college student unless they are working 20 hours a week or more^{xv} or eligible for one of the exemptions to the rule as listed below. A student is subject to this rule if they are aged 18-50, enrolled at least half-time or more, as defined by the school^{xvi} in an institute of “higher education”^{xvii} and enrolled in a “regular curriculum”.^{xviii} A student is exempt from the rule if they are:

- Eligible for and anticipate working at a state or federal work-study job. The exemption begins the month the school term starts or the month work study is approved, whichever is later, and continues until the end of the month the school term ends;^{xix} or;
- A full-time student with a child under age 12; or Part-time student with a child under age six or a child between ages six and 12 for whom adequate care is not available; or
- Receiving a Temporary Aid to Needy Families (TANF) Funded Benefit;
- Enrolled in a food stamp employment and training (FSET) program; or other state or local job training programs, as identified by the State and approved by the USDA.^{xx}
- Does not intend to register for the next normal school term.^{xxi}

If a student fails to qualify for an exemption to the student rule is not eligible for one of these exemptions and not working an average of 20 hours per week or more, the student is ineligible and neither their income nor needs are considered in determining assistance for the household. If they live in a household with other CalFresh eligible people, those people will receive aid, but aid for the non-exempt college student will not be included. In some situations, when a student is working (but less than requisite 20 hours) the exclusion of a student may actually increase the benefit level for households in which there are other people who have little or no income.

Brief History of California’s Implementation of the SNAP Student Rule

While the student rule has several exemptions, California had not implemented them prior to 2014. Without guidance for how to verify these exemptions, county agencies simply told students that if they were attending part time and were not working 20 hours per week, they simply weren’t eligible. Chaptered in 2014, Assembly Bill 1930 (D-Skinner) required DSS to establish a work group to identify which “state or local job training programs” would exempt a college student from the student work rule. Additionally, it required that the Department issue guidance to counties about how to identify and verify participation in one of these programs. The work group, established in May 2015, went one step further and also issued guidance to counties about how to verify some of the other exemptions. The policies established subsequent to the workgroup were done so in all county letters which include a checklist for advocates and counties alike to assist a college student in screening for an exemption.^{xxii} AB 214 codified this work, and requires DSS to establish a process to identify programs that qualify for a student for an exemption.



The Budget Act of 2019-20 required DSS to convene a workgroup to advance this work and identify next steps to addressing campus hunger by increasing participation among students who are eligible. It also required DSS to document how many college students they think are eligible and how many are eligible and not participating. This report is pending.

Electronic Benefit Transfer (EBT) 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 due to lack of access to food retailers that accept EBT on college campuses. There are three ways that college campus stores can accept EBT, they are:

I. The CalFresh Restaurant Meal Program (RMP),^{xxiii} which allows people who are homeless, elderly or disabled to use their food benefits to purchase prepared meals from a qualified participating restaurant, deli counter or store. The CalFresh RMP not only prevents hunger by allowing vulnerable populations, who may not have a safe space or the ability to prepare their own food, to use their benefits to purchase discounted prepared meals at participating restaurants in participating counties, it also prevent food borne illnesses^{xxiv} and increases choices for these populations. Only ten counties have currently elected to participate in RMP,^{xxv} but legislation signed and passed this year and last will allow all college campuses to participate with state and federal approval. Related legislation includes:

- **AB 1747 (Weber)^{xxvi}** Chapter 290, Statutes of 2016 requires all public colleges and universities located in a county that participates in CalFresh RMP to apply for any qualifying food retailers run by the institution and to inform food retailers on campuses not run by the institution about the program.^{xxvii}
- **AB 1894 (Weber),^{xxviii}** Chapter 746, Statutes of 2018, allowed the California Department of Social Services (DSS) to enter into a memorandum of understanding with the CSU Chancellor in order to allow any qualifying food facility located on a California State University (CSU) campus, regardless of whether or not the CSU is located in a county that has chosen to participate.^{xxix}
- **AB 612 (Weber),^{xxx}** Chapter 804, Statutes of 2019 allows DSS to enter into an MOU with the Chancellor of the California Community Colleges in order to allow any qualifying food facility located on a CCC campus to participate in the RMP, even if the CCC campus is located in a county that does not participate in the RMP.
- **AB 942 (Weber),^{xxxi}** Chapter 814, Statutes of 2019, would require DSS to establish a statewide RMP and to implement these provisions on or before September 1, 2020.

II. Grocery Sale Approval on College Campuses: The United States Department of Agriculture (USDA) is responsible for approving retailers for the SNAP program. California state and county government do not participate in this process except for overseeing the contract with the state's EBT vendor who works to administer the Point of Sale (POS) process and daily purchase



transactions. Among the many requirements of an approved SNAP retailer, they must maintain certain products and a specified percentage of their sales must be food available for purchase through SNAP. Because of the unique environment on college campuses, there are few college campus grocery stores that qualify to become a SNAP retailer.^{xxxii} However, California's CSU system hosted some of the first colleges in the country to build out their college campus grocery stores to ensure that they met the SNAP standards.^{xxxiii}

III. Farmers Markets on College Campuses that Accept EBT: California was one of the first states in the country to master EBT at farmers markets and when farmer's market EBT systems went down across the country last year, California's market EBT system was uninterrupted.^{xxxiv} This is because, understanding the important role that farmers and the farm economy play in our state, the California Legislature passed legislature requiring DSS to support EBT at farmer's markets. As a state, we have also supported CalFresh purchases at Farmer's Markets through Market Match, which gives a bonus to people who purchase food using EBT at certain markets.^{xxxv} Bringing a farmers markets to college campuses has been found to be an effective way to increase access to CalFresh recipients who are college students.^{xxxvi} It has also offered ways for the college campus to make itself more open to community members who live in neighboring communities and receive CalFresh.

Pantries Are on Every Public College in California

With three years of budget investments in the Hunger Free College 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 to succeed.^{xxxvii}

Food Sharing or Food Vouchers Available at Every CSU and UC

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

About Western Center on Law and Poverty

For over five decades, the Western Center on Law & Poverty has advocated on behalf of individuals with low incomes in every branch of California government—from the courts to the Legislature. Through the lens of economic and racial justice, we litigate, educate and advocate around health care, housing, and public benefits policies and administration. Learn more at: www.wclp.org. For more information about these bills or about or efforts to address college campus hunger, contact:

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Endnotes

ⁱ “More College Students Battle Hunger As Education and Cost of Living Costs Rise,” The Washington Post, April 9, 2014. http://www.washingtonpost.com/local/more-college-students-battle-hunger-as-education-and-living-costs-rise/2014/04/09/60208db6-bb63-11e3-9a05-c739f29ccb08_story.html

ⁱⁱ Source: <http://www.latimes.com/local/lanow/la-me-cal-state-homelessness-20160620-snap-story.html>

ⁱⁱⁱ Serving Displaced and Food Insecure Students in the CSU (Feb 2016): <https://presspage-production-content.s3.amazonaws.com/uploads/1487/cohomelessstudy.pdf?10000>

^{iv} In Cal State universities, 42% of students are food insecure and 11% are homeless.

https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Documents/BasicNeedsStudy_phaseII_withAccessibilityComments.pdf and https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Documents/BasicNeedsStudy_Phase_3.pdf

^v The 2019-20 Budget Student Food and Housing Insecurity at the University of California

https://lao.ca.gov/Publications/Report/4014?utm_source=t.co&utm_medium=referral&utm_campaign=4014

^{vi} “Addressing the Basic Needs of California Community College Students,” Sara Goldrick-Rab & Debbie Cochran (May 2019), https://ticas.org/wp-content/uploads/legacy-files/pub_files/hope-ticas-cccco-brief.pdf

^{vii} A University of Oregon conducted this year found that 59 percent of students at Western Oregon University had recently experienced food insecurity. The figure was 21 percent in a 2009 report on students at the University of Hawaii at Manoa.

^{viii} “Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits,” United States General Accountability Office (GAO) Report to Congressional Requesters (January 2019) <https://www.gao.gov/assets/700/696254.pdf>

^{ix} http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB214

^x AB 1930 (Skinner – 2014) Chaptered in 2011, implemented by ACL 15-70 (September 17, 2015), ACIN 1-89-15 (December 31, 2015), and AB 17-05 (Feb 14, 2017), was sponsored by the California Coalition of Welfare Rights Organizations (CCWRO) and Western Center on Law and Poverty. Text of the bill can be found at: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB1930

^{xi} Text and analysis can be found here:

http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200SB173. The implementing All County Letter is pending.

^{xii} CSU Hunger Free Campus Website is found here: <https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Pages/hunger-free-campus-designation.aspx>

^{xiii} For a copy of the UC office of the President report on how they used their Hunger Free Campus funds, see: https://www.ucop.edu/operating-budget/files/legreports/18-19/hunger-free-campus_legrpt-2-13-19.pdf

^{xiv} For a look into advocacy efforts by students themselves, see “A Plate at the Table: Student Stories and Recommendations regarding Hunger and Basic Needs Insecurity”, published by the University of California Student Associations and Accessible at <http://ucsa.org/wp-content/uploads/2016/07/Report-A-Plate-At-The-Table.pdf>

^{xv} USDA granted a waiver to CDSS allowing them to use reasonably anticipated monthly average of work [\[ACL 12-37\]](#)

^{xvi} 7 C.F.R. § 273.5(a); MPP §§ 63-406.1 and .21.

^{xvii} 7 C.F.R. § 273.5(a); MPP §§ 63-406.1 and .21. Higher education institutes are either: business, trade, technical or vocational schools that normally requires a high school diploma or GED to enroll – only half time enrollment matters; or A junior, community, two-year or four-year college or university, or graduate school, whether or not a high school diploma or GED is required.



^{xviii} MPP § 63-406.111(a)(2). If the program or course (as opposed to the college) does not require a diploma or GED, the student bar would not apply. [MPP § 63-406.111(a)(2)(A); 60 Fed.Reg. 48865-69.] Regular curriculum means that the course in which the person is enrolled meets the standard requirements for graduation or certification/qualification in a particular field of study. [MPP § 63-406.]

^{xix} MPP § 63-406.212

^{xx} 7 C.F.R. § 273.5(b)(11).

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

^{xxii} ^{xxiii} [ACL 15-70 \(September 17, 2015\)](#), which represents the first step in implementing [AB 1930 \(Skinner\)](#), co-sponsored by Coalition of California Welfare Rights Organizations, requiring CDSS to identify programs that would qualify college students for exemptions from the CalFresh Student Work Rule. [ACL 17-05 \(February 14, 2017\)](#) establishes list of programs that qualify someone for an exemption to the student work rule. Additional ACL's were issued on this topic. They are: [ACL 18-27](#) and [ACL 19-32](#).

^{xxiii} A Primer on the Restaurant Meal Program in California, <https://wclp.org/wp-content/uploads/2016/11/YGA-12161-SNAP-doc1-1.pdf>

^{xxiv} Peter Jackson & Angela Meah (2018) Re-assessing vulnerability to foodborne illness: pathways and practices, Critical Public Health, document higher rates of illness among people who are homeless.

<https://www.tandfonline.com/doi/full/10.1080/09581596.2017.1285008>

^{xxv} Information about California's CalFresh RMP can be found at:

<http://www.ebtproject.ca.gov/ClientInformation/calfreshrmp.shtml> The ten counties participating in the restaurant meals program are Alameda County, Los Angeles County, Orange County, Riverside County, Sacramento County, San Diego County, San Francisco County, San Luis Obispo County, Santa Clara County, Santa Cruz County

^{xxvi} Text & analysis of AB 1747:

http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB1747

^{xxvii} AB 1747 (Weber, 2016) Implementation Guide: https://wclp.org/wp-content/uploads/2016/10/AB-1747-Weber_Implementation-Guide-Colleges-in-RMP-Participating-Counties.pdf. The DSS All County Letter can be found here: <https://www.cdss.ca.gov/lettersnotices/EntRes/getinfo/acl/2016/16-112.pdf>

^{xxviii} Text & analysis of AB 1894:

http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB1894

^{xxix} CSU Restaurant Meal Program Participation Guide, CSU Basic Needs Initiative, Office of the CSU Chancellor: https://www2.calstate.edu/impact-of-the-csu/student-success/basic-needs-initiative/Documents/CSU_RMP_Tips2019_REV1.pdf

^{xxx} Text and analysis of AB 612:

http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB612

^{xxxi} Text and analysis of AB 942:

http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB942

^{xxxii} For more information about expanding access to Electronic Benefit Transfer (EBT) on college campuses through RMP and non-RMP grocery outlets, see "Strategies to reduce hunger on MA campuses: SNAP EBT access on public college campuses," by Yesenia Jimenez, Emerson Fellow, found online at:

<https://www.hungercenter.org/publications/strategies-to-reduce-hunger-on-ma-campuses-snap-ebt-access-on-public-college-campuses/>

^{xxxiii} CSU Long Beach and CSU Humboldt State University accept EBT cards in their campus grocery stores.

^{xxxiv} For more information about California's Farmer's Market EBT System, go here:

<http://www.ebtproject.ca.gov/Businesses/farmersMarket.html>

^{xxxv} For more information about California's Market Match, go here: <https://marketmatch.org/>

^{xxxvi} "Hunger on campus: How college students can get help," Anna HelHoski (October 2019)

<https://apnews.com/8a2d6dc5372841cd8ef30ddd04aac045>

^{xxxvii} There is no single place where a public college student in California can go to learn of a pantry on campus, but most campuses post the hours and location of their pantry distributions online. People can also use the [College and University Food Bank Alliance's search tool](#) to find campus food pantries.