SNAP Student Rules Are Not So Snappy: Lessons Learned From a Qualitative Study of California County Agency Workers

Suzanna M. Martinez, PhD, MS¹; Sonali Singh, MPH¹; Erin Esaryk, MPH¹; Lorraine Ritchie, PhD, RD²

ABSTRACT

Objective: To examine the college student Supplemental Nutrition Assistance Program (SNAP) application process from the perspective of county agency workers.

Design: A qualitative study that included semistructured individual and group interviews (n = 14) between February and December, 2021.

Setting: Nine California counties with a University of California campus.

Participants: A total of 24 county agency workers who regularly process or advise on college student SNAP applications.

Phenomenon of Interest: Facilitators and barriers to processing student SNAP applications.

Analysis: Interviews were recorded, transcribed, and coded using thematic analysis.

Results: Five themes were identified regarding student applications: (1) a need for more consistency in policy dissemination and program administration, (2) student exemptions and the application process are perceived as challenging for students, (3) facilitators of successfully processing student applications, (4) tracking policy changes is burdensome, and (5) eliminate the student rules.

Conclusion and Implications: County agency workers perceived that students experience unnecessary barriers to accessing SNAP benefits and that implementing the student rules was taxing. Expanding SNAP access to low-income college students could be an equitable solution to mitigate the risk of student hunger while they pursue their degrees.

Key Words: nutrition policy, food insecurity, college students, SNAP (J Nutr Educ Behav. 2024;56:133–144.)

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INTRODUCTION

Food insecurity (the limited or uncertain ability to acquire nutritionally adequate foods because of a lack of resources)¹ impacts 10% of US households.² Higher estimates of food insecurity (> 40%) have been observed among US college students.³⁻⁵ Food insecurity among college students is associated with negative physical and mental health, lower academic performance, and graduation rates.⁶⁻⁸

The Supplemental Nutrition Assistance Program (SNAP)—the nation’s largest food assistance program—could address food insecurity and its implications for this population.

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Few studies have examined SNAP participation in relation to health and academic outcomes among college students. Notably, 2 studies among students attending several large California public universities have shown promising results.⁹,¹⁰ Nazmi et al⁹ found 89% lower odds of food insecurity at 6 months among students participating in SNAP than nonparticipants. Furthermore, Loofbourrow et al¹⁰ found that SNAP participation had a protective effect on the academic performance of students facing food insecurity. These findings highlight the potential benefits of SNAP for students in higher education.

Approximately 3.3 million students are SNAP-eligible, of which an estimated 57% are not enrolled.¹¹ Low SNAP enrollment by college students is attributed to confusing student requirements to meet SNAP eligibility.¹² According to federal policy, students who are enrolled at least half-time are categorically ineligible for SNAP unless they meet general eligibility requirements plus at least 1 exemption—known as the student eligibility rules (Table 1).¹³ Verification documents supporting student status and exemptions (eg, financial aid award letter, proof of

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employment and training) and completing an unscheduled phone interview with an eligibility worker within 30 days are also required before determination of benefits is made. These requirements have been documented as challenging for students, often resulting in denied benefits. Students who are SNAP-approved often encounter termination of benefits for failing to submit the Semi-Annual Report (SAR-7) form, which must be submitted every 6 months after initial approval to renew and maintain benefits. A 2018 federal study provided recommendations to the US Department of Agriculture’s Food and Nutrition Service (FNS) to improve student SNAP access, which included (1) clarifying student eligibility information on the FNS website and (2) coordinating with regional agencies to share best practices, given that many students are unaware of their eligibility. In 2021, FNS revised its SNAP website for students, with the second recommendation remaining in progress.

The FNS administers SNAP at the federal level to offer minimum requirements, and states are given flexibility in how the program operates and can augment the funding to better serve the unique needs of their residents. In California, SNAP is known as CalFresh, and benefits are paid by the federal government. The costs to administer the program are shared by state, county, and federal governments. CalFresh is overseen by the California Department of Social Services (CDSS) and operated by county welfare agencies. County agencies are responsible for implementing policies, determining eligibility, processing applications, and distributing funds. California policies focusing on the Student Work Rule (working at least 20 h/wk) aim to clarify student employment and training exemptions, such as Assembly Bill 1930, which specifically names the Educational Opportunity Program, Cal Grant, and other state or local training programs. The more recent Assembly Bill 396 enlists California’s public higher education systems to certify academic programs as training and employment programs with the state (known as the Local Programs that Increase Employability) to exempt participating students from the Student Work Rule, thereby streamlining student eligibility. Finally, the California Student Aid Commission, which administers the state’s financial aid programs, provides SNAP-eligible students with a letter documenting their eligibility status, which can be submitted with their CalFresh application.

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<tr>
<th>Table 1. Exemptions to the SNAP’s Student Rule Under Federal Guidelines and California’s Interpretation of the Federal Guidelines</th>
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| **Federal Student Exemptions**
| - Aged < 18 or ≥ 50 y  
| - Physically or mentally unfit (have a disability)  
| - Work at least 20 h/wk, on average, in paid employment  
| - Approved for state or federally-financed work-study and anticipate participating  
| - Receive TANF benefits  
| - Care for a child aged < 6 y  
| - Care for a child aged 6−11 y and lack adequate child care  
| - Single parent caring for a child aged < 12 y  
| - Participating in a SNAP E&T program or other state or local program with an equivalent E&T component  
| - Participating in a JOBS program  
| - Participating in a WIOA program  
| - A program under Section 236 of the Trade Act of 1974  
| - EFC of 0 a  
| - Eligible to participate in state or federally-financed work-study program a |
|**California Student Exemptions**
| - Aged ≤ 17 or ≥ 50 y  
| - Physically or mentally unfit (have a disability)  
| - Work at least 20 h/wk, on average, in paid employment  
| - Approved for state or federally-financed work-study and anticipate participating  
| - Received TANF-funded Cal Grant A or B in the past 12 mo  
| - Receiving CalWORKS or Tribal TANF  
| - Care for a child < 6 years  
| - Care for a child aged 6−11 y without adequate child care  
| - Single parent caring for a child under the age of 12  
| - Participating in a CalFresh E&T program  
| - Participating in a JOBS program  
| - Participating in a WIOA program  
| - Participating in a program under Section 236 of the Trade Act of 1974  
| - Enrolled in a Local Program that Increases Employability  
| - Does not expect to be enrolled next term  
| - EFC of 0 a  
| - Eligible to participate in state or federally-financed work-study program a  
| - Waive student verifications and interviews b |

CalWORKS indicates California Work Opportunity and Responsibility to Kids; COVID-19, coronavirus disease 2019; EFC, Expected Family Contribution; E&T, Employment and Training; JOBS, Job Opportunities and Basic Skills; SNAP, Supplemental Nutrition Assistance Program; TANF, Temporary Assistance for Needy Families; WIOA, Workforce Innovation and Opportunity Act.

aTemporary pandemic modifications under the federal COVID-19 Public Health Emergency; bCalifornia policies introduced and implemented in May, 2021.
Despite California’s policies to improve college students’ access to CalFresh, challenges persist. CalFresh participation remains low, with approximately 78% of those eligible not receiving benefits. Findings from a recent study of University of California campus staff who provide CalFresh assistance found heterogeneity in how student exemptions are interpreted among county agency workers, which likely impacts student access to food assistance. The need to create consistency across counties and states is crucial, given the complex criteria for meeting SNAP eligibility and the large prevalence of SNAP-eligible students. To date, there has not been an examination of how the student eligibility rules are implemented at the county level. As such, the purpose of this study was to better understand the student SNAP application process from the perspective of county agency workers. We used a qualitative approach with county agency CalFresh staff to generate themes related to the SNAP application process for students with the goal of improving SNAP access among college students.

METHODS

This research study took place within the context of the University of California’s (UC) Systemwide Basic Needs Initiative, an effort that began in 2015 with a primary focus on addressing student food insecurity. By 2018, the 10-campus UC system had Basic Needs staff providing CalFresh assistance to students, with most campuses collaborating with their local county agency or food bank.

Participants and Recruitment

Counties with a UC campus were selected to participate, which included rural and urban counties throughout California: (1) Alameda, (2) Los Angeles, (3) Merced, (4) Orange, (5) Riverside, (6) San Diego, (7) San Francisco, (8) Santa Barbara, (9) Santa Cruz, and (10) Yolo. Because students were being assisted to apply for CalFresh in these counties, it was expected that county staff had experience processing student applications. Of the 10 counties invited to participate, all but San Diego County accepted because of limited bandwidth during the pandemic. Counties were contacted in several ways. First, the CDSS CalFresh Branch initiated contact with CalFresh supervisors at the county level to introduce the research study and study team. When possible, UC Basic Needs staff emailed their local county contacts to provide similar information and to connect them to the research study team, who then invited them to participate in the study. At campuses without a county contact, county supervisors selected county workers on the basis of the eligibility criteria: workers who regularly processed or advised on college student CalFresh applications. Although eligibility workers who directly handle student applications were prioritized, county supervisors who manage eligibility workers, training officers who oversee training programs, and policy specialists who advise eligibility workers on policy interpretation were also included in counties with low capacity because of the rapid increase in CalFresh applications during the coronavirus disease 2019 (COVID-19) pandemic. Participants were offered a $20 gift card as a participation incentive. This study was deemed exempt by the Institutional Review Board of the UC San Francisco.

Data Collection

Seven individual interviews and 7 group interviews were conducted with county staff (n = 24) between February and December 2021 over Zoom (version 5.8.3, Zoom Video Communications, Inc, 2021). Discussions were led by 2 trained facilitators with knowledge of the SNAP application process. Individual or group interviews were selected on the basis of county staff capacity and scheduling availability. Although all participants were informed that interviews would take 60–90 minutes, individual interviews lasted approximately 45 minutes, and group interviews of 2 or 3 participants lasted approximately 90 minutes. Discussions were audio-recorded and transcribed verbatim. Participants were provided a nonidentifier throughout the discussion to preserve anonymity. Facilitators used a semistructured interview guide (Table 2) developed by the study team, with input from UC Basic Needs staff and the CDSS CalFresh and Nutrition Branch. Participants were asked to describe their role at the county and their experience processing student applications. Questions focused on how students’ applications differed from community applicants, steps taken when processing student applications, student-specific training, and suggested improvements to the process.

Data Analysis

We used an integrated approach, using an inductive development of codes and themes, and a deductive framework for organizing the codes into themes guided by the study’s aims and literature that has been documented in higher education. We developed a preliminary coding scheme on the basis of the initial identification of themes from the transcripts, audio recordings, and notes. Two project team researchers developed codes by independently reviewing the same 2 transcripts, from which a coding scheme was developed. The coding scheme and transcripts were then entered into Atlas.ti software (version 8, Atlas.ti Scientific Software Development GmbH, 2019) for qualitative analysis. Two authors independently coded all transcripts and added and refined the coding scheme. Different codes could be applied to the same segment of dialogue. The principal investigator reviewed codes for discrepancies and worked with the 2 coders to reach a consensus. Triangulation among multiple coders was used to reduce bias and improve reliability.

RESULTS

Table 3 provides a summary of the interviews conducted by type of discussion and staff roles for each county. Providing more context could lead to the identification of participants. Therefore, details were not included regarding the specific county to which county agency staff belonged to uphold confidentiality. Of the 24 participants, roles included 18 eligibility workers, 4 policy specialists (of which one was formerly an eligibility worker),
1 training officer, and 1 supervisor. Participants described their staff role during the interview. Eligibility workers were responsible for reviewing public assistance program applications, conducting interviews, analyzing financial information, determining initial and continual eligibility, and managing case records. Policy specialists were responsible for interpreting policy changes coming from the state and working with program managers to implement them at the county level. The training officer’s responsibility was to plan and provide a variety of training to new hires and existing staff. Finally, the supervisor’s primary responsibilities were to review complex cases, clarify policies, and oversee social service programs.

Table 4 outlines key quotes by 5 central themes identified in our interviews: (1) a need for more consistency in policy dissemination and program administration, (2) student exemptions and the application process are perceived as challenges for students, (3) facilitators of successfully processing student SNAP applications, (4) tracking policy changes is burdensome, and (5) eliminate the student rules. For several themes, subthemes were also identified.
Need for More Consistency in Policy Dissemination and Program Administration

Inconsistent CalFresh training regarding student exemptions across counties. The frequency of student-specific training and whether they were mandatory differed by county. On hire, eligibility workers receive an initial 6-month comprehensive training, with 1 eligibility worker (no. 13) commenting that their training had been 7 years ago. Although a student-focused component was included within the larger CalFresh training, 1 eligibility worker (no. 17) noted that expanding CalFresh eligibility to students was “more of an on-the-job type of training.” In one county, student-specific training was annual and offered more frequently when policy regarding student exemptions changed. Another county held quarterly refresher training, which included exemptions to the student rules when policy changes occurred. A policy specialist noted that their training was coordinated by a state-affiliated consultant and their staff development, using case reviews when an increase in a particular type of error was identified. Most staff development training was optional. In response to COVID-19-related policy changes, 1 county made a video to keep eligibility workers up to date on timely policy changes. Eligibility workers relied on their supervisors or policy specialists for clarification and to answer questions.

Inconsistent channels of communication with students. When requesting student verifications, most counties contacted students by phone or mail, except for 1 county that used email (with student permission). Several counties discontinued the use of email because of privacy concerns. Regarding SAR-7 renewal forms, 1 eligibility worker (no. 10) noted that their county used an online platform to email reminders to students of their upcoming recertification. Another eligibility worker (no. 7) stated that they were waiting to transition to an online platform, which other counties had done, and continued to use mail as their sole method of communication. Several eligibility workers (nos. 1, 6, 14) and 1 policy specialist from separate counties noted having an automated text messaging service, which sent reminders to students regarding appointments and submitting verification documents, which eligibility workers did not operate.

Student Exemptions and the Application Process Are Perceived as Challenging for Students

Supplemental Nutrition Assistance Program eligibility may be confusing for students. One-third of eligibility workers discussed the confusion that students experienced in determining whether they were eligible for CalFresh, a potential consequence of the student rules. For example, a policy specialist described that many students believed that they were eligible for CalFresh if their roommate had been approved for benefits. In addition, eligibility workers stated that students often were unaware that participating in programs stated in Assembly Bill 1930 (eg, Educational Opportunities Program) exempted them from the work requirement. In general, eligibility workers felt that many students were confused about the CalFresh process.

Students may be intimidated by the SNAP application process. One-third of eligibility workers perceived that student confusion and uncertainty regarding the application process resulted in hesitancy. One eligibility worker (no. 6) stated that “once students get confused or . . . don’t know what they need to do…[they] don’t follow through with their application.” Another eligibility worker (no. 7) noted, “I have had students that are nervous of applying. . .[T]hey don’t know what to expect.” This was especially true for the interview. She added that “they [students] get a little bit nervous, just being in an interview” and discussed the importance of ongoing clear communication with students to encourage application completion rather than giving up because of the uncertainty.

Students have trouble providing verification documents. More than half of eligibility workers discussed student confusion regarding verification documents and where to find them, such as California Student Aid Commission eligibility or financial aid letters, which could delay application processing. Staff discussed the importance of verifying documents within the first couple of days as this would ensure timely processing and approval, but the eligibility worker experience was that students applying on their own were unclear about which documents to submit. Sometimes, students did not submit documents or submitted incorrect ones, which required eligibility workers to contact students, which could be challenging. Some eligibility workers described trying to contact students within 10 days, given that incomplete applications are denied after 30 days. Termination of benefits was another issue for enrolled students, which usually resulted from not submitting their SAR-7 form. Students with missing or incomplete SAR-7 forms had a 30-day grace period to submit late forms to restore their benefits. Because students were unaware of this policy, many lost their benefits and reapplied. In general, not submitting documents on time was one of the biggest challenges eligibility workers faced in helping students enroll for benefits or maintaining them.

 Unscheduled phone interviews are difficult to complete for students. Eligibility workers spoke about the barrier of the phone interview. One eligibility worker (no. 3) stated that “the interview tends to be the most challenging part” because students have hectic lives, being full-time students, often while working. Students often missed their interviews because of being in class, a common issue as calls were made around eligibility workers’ schedules. Another eligibility worker (no. 10) mentioned that the interview had been waived for California applicants without income or experiencing homelessness during COVID-19, a state policy that was met with some resistance by workers who felt like the interview was necessary for accurate information.
Table 4. Themes and Key Quotes From 24 County Agency Workers Across 9 California Counties Who Participated in Qualitative Interviews Regarding the College Student SNAP Application Process

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<th>Themes and Subthemes</th>
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<td>Inconsistent CalFresh training regarding student exemptions across counties</td>
<td>&quot;...when we were in training for the position, we received some type of [student] training and, again, we have paperwork and we have forms and, you know, just updates. But ongoing, I don’t think that we’ve had official refresher trainings or anything—not that I can recall anytime recently...but I feel like with student eligibility, it’s been more of a ‘on the job’ type of training, so you kind of learn along the way with guidance from supervisors and just putting material together...You kinda just stay on top of it and just have it up to date.&quot; [Eligibility worker no. 17]</td>
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<td>Inconsistent channels of communication with students</td>
<td>&quot;Well, we had one [student training] just September last year. Prior to that one, I don’t have a date when we did another one for students. But there are call outs that go out every so often for any changes that come from the state, and usually that’s how we get our information, mostly through call outs [email].&quot; [Eligibility worker no. 1]</td>
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<td>&quot;The training I received was when I first started with this department, so that was almost seven years ago I want to say. I don’t think we’ve had any refreshers or anything, because even if we do have any updates in our policy, then we go over those policies each month at our unit meetings....There’s not really much changes that we do get with student eligibility, so there’s not really much that we do need refreshers on when it comes to that. So yeah, that was the only other training that I believe that I’ve received.&quot; [Eligibility worker no. 13]</td>
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<td>&quot;It’s not required to email clients...It’s best at the discretion of the worker, but usually the main point of contact is by phone&quot; [Eligibility worker no. 15]</td>
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<td>&quot;We don’t allow email just because there’s like a layer of security that is required to protect confidential information, so our workers are not allowed to email directly to any client, not just students.&quot; [Policy specialist]</td>
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<td>&quot;I know that sometimes people can log into their cases online and they can actually pull their semi-annual reporting forms on the online system. It’s just that here, in this county, we don’t do that yet, but what we do is we just mail it out to them to the address that we have on file....I believe some workers do reach out to clients and have tried to reach out to them by phone and let them know that.&quot; [Eligibility worker no. 7]</td>
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Student exemptions and the application process are perceived challenges for students

| SNAP eligibility may be confusing for students | "...and a lot of people, they’ll come in and they’ll say, ‘you know, my friend, my housemate, got CalFresh. How come I don’t get CalFresh?’" [Policy specialist] |
| | "...[students] think that they’re not going to be eligible, or they think that they have to be working because they kind of have heard about the student requirement, which is you have to be working at least a minimum of 20 hours per week, but they don’t know about the exemptions. So, they don’t know...that if they’re an EOP [Educational Opportunities Program] student they can be exempt from it [Student Work Rule]." [Eligibility worker no. 18] |
| | "I feel like not a lot of them are aware of, like, their eligibility, ‘cause most of them are eligible because most of them don’t have a family contribution and then they get work study or are an EOP student and that automatically makes some qualify for it, but they don’t know so they don’t apply for it." [Eligibility worker no. 5] |
| Students may be intimidated by the SNAP application process | "A lot of the challenges that we encounter here at intake when we get the application is that the online application, a lot of the times will be blank or incomplete....I’ll see a lot of them that just have ‘no’ marked on every question." [Eligibility worker no. 14] |
| | "I feel that a lot of the time, once the students get confused or, you know, they don’t know what they need to do or what they need to submit, and they kind of just give up and don’t, you know, don’t follow through with their application." [Eligibility worker no. 6] |
| | "...it’s [the application] pretty confusing...It could even be a little intimidating....All the information that we give them in just that hour [during on-campus outreach] is, you know, it’s a lot for them to take in." [Eligibility worker no. 7] |
| Students have trouble providing verification documents | "So, we do get a lot of applications where they [students] are reapplying because they fell off at SAR-7 [benefits renewal form]." [Eligibility worker no. 6] |
| | "...when we ask for like student financial aid, there’s certain criteria that we’re looking for so they could meet the student eligibility. But some of them, they just have a hard time looking for the verification we’re requesting so they don’t do it. And since it’s a 30-day time frame, like a processing period, we end up denying the case because we only could keep it open for 30 days." [Eligibility worker no. 5] |
| | "A good portion of the denials that I usually see from my own personal applications is a lot of students usually don’t turn in their documents." [Eligibility worker no. 18] |

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Table 4. (Continued)

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<th>Themes and Subthemes</th>
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<tr>
<td>Unscheduled phone interviews are difficult to complete for students</td>
<td>“I would say that it is difficult to reach students for interviews. They missed a lot of their interviews because they have other obligations, such as obviously, they have school, but then they also have work, and sometimes they have multiple jobs, so trying to juggle work and school and then trying to fit in a 30 minute to an hour appointment for CalFresh could seem difficult, especially if they have midterms or finals sometimes.” [Eligibility worker no. 18]</td>
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<td>“The interview tends to be the most challenging part. You know, trying to find that gap that works with students based on their schedules.” [Eligibility worker no. 3]</td>
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<td>“I haven’t had to interview any students...but what I have heard is that sometimes they schedule the interview and then when they [eligibility workers] go to call, they [students] say ‘I can’t really talk right now, I’m in a class.’ So, when we scheduled the interview, we’re not looking at ‘What is your availability... We’re going based off of our availability...’” [Social Services Supervisor]</td>
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Facilitators of successfully processing student SNAP applications

| Eligibility workers put in extra effort to ensure student eligibility | “Let’s say, for example, if the worker doesn’t ask ‘Oh hey, do you have any work study’ or ‘do you have a family contribution of 0?’ If they don’t ask those exemption questions then they’ll be like ‘oh hey, you’re a student, you’re not eligible’—bam, denied, you know? So, they have to do their due diligence. And that’s where unfortunately, sometimes because of the lack of due diligence, an applicant may have been erroneously denied because those questions are those critical questions...” [Eligibility worker no. 10] |
| Resources on student requirements that are useful | “Every time we communicate with the student clients, we have to journal everything very thoroughly, because it’s not only just passed to who handles the case. It can be touched by many workers who come in contact with that client so, as a worker, what we do is, when we do get those phone calls, we review all the journals. We go through everything. We go through as much information as we can so that we can answer their questions.” [Eligibility worker no. 7] |
| | “…because every application is different, every scenario is different, so if it’s something unique or a certain situation or certain application where extra work, or I have to ask extra questions, I try to keep in this folder to kind of refer back to if need be in the future.” [Eligibility worker no. 16] |
| | “Sometimes a worker gets stumped on the type of like grants or fellowships that graduate students get... We check if they meet this criteria, then stop here. If they don’t, then keep asking questions.” [Policy specialist] |
| | “We have desk guides on our intranet website where we can just access where they have the latest updates or if there’s any changes and it’s just a brief summary of the exemptions, definition of a student, and stuff. So that really helps when you try to go through an interview with a client over the phone...” [Eligibility worker no. 15] |
| | “We also have that cheat sheet, and it outlines essentially all of the eligibility criteria for a student.” [Eligibility worker no. 14] |
| | “[GetCalFresh.org] is actually an easier website. It advertises that it only takes 10 minutes... So, when it comes electronically for GetCalFresh, they have this page that talks about student exemptions... and based on whatever is answered it generates this one document form and to see if that student’s eligible for any exemptions. So that’s a quick way for workers to be aware...” [Policy specialist] |
| Campus partnerships are critical for application determination | “She’d [a university staff member] come to me if I needed help getting through the financial aid office and then she connected me with the work study director when we were having so many issues with work study. And so then I was emailing him and then it just grew, and that’s, I think, how student applications had just gotten so much better.” [Policy specialist] |
| | “We usually send them out a CalFresh student exemption checklist. A lot of them to be able to view that checklist so that they know prior to applying, they’ll know what they need to turn in for us. As for forms for them to complete, I think that’s more on, like, our end where we want to know who we can reach out to to get that information from, because a lot of times—sometimes the students they find it very difficult to try to get that information to go to their, you know, financial aid office or to go to their registration office, whatever it may be. We, as in us, we can make that call to them as long as we have a release of information, we can definitely go ahead and contact the UC or the JC to get that information from them, but a lot of times the CalFresh student exemption is very helpful if we send it out to them so that they know what kind of exemption that they need to meet in order to qualify for CalFresh benefits.” [Eligibility worker no. 8] |
| Tracking policy changes is burdensome | “I can’t memorize all this information...we get constant changes and updates...” [Eligibility worker no. 16] |

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Facilitators of Successfully Processing Student SNAP Applications

Eligibility workers put in extra effort to ensure student eligibility. Although few eligibility workers described student requirements as “black and white,” the majority discussed how they carefully reviewed student applications for potential exemptions. Because filtering through student exemptions is not a one-size-fits-all approach, eligibility workers described probing students for information that might reveal meeting an exemption. When not apparent, eligibility workers described asking about less common circumstances, such as being a former foster youth or reviewing employability and training programs to ensure that all exemptions were considered. Some staff were empathetic to students’ needs, as one supervisor voiced, “we should be helping them…but I feel like [federal rules] make it a little harder…so we really do try and help the students to make them eligible.” Because it is not uncommon to receive incomplete student applications, eligibility workers explained that preparing additional interview questions in advance and inquiring about “special circumstances” that would exempt students were critical in determining CalFresh eligibility status. Eligibility workers also spoke about the complexity of determining graduate student eligibility because they do not typically apply or qualify for federal financial aid, such as Pell Grants. Thus, eligibility workers found other ways for graduate students to meet an exemption to the student rule, which required meticulously reviewing student exemptions, particularly for graduate students.

Resources on student requirements that are useful. Most staff spoke of handbooks to assist with the student application process. Some county policy specialists developed and provided guides, such as checklists and charts, to assist eligibility workers through the various student exemptions. A policy specialist shared that not all eligibility workers are familiar with how to process student applications, so having resources helped staff to “ask the right questions.” In 1 county, it was standard to attach a completed checklist to every case to ensure all possible exemptions were considered. Another county maintained an intranet website with the latest CalFresh policy changes in addition to desk guides for staff. One eligibility worker (no. 15) found that the internal network “really helps when [trying] to go through an interview with a client over the phone.” Another useful resource for workers was the Approved List of Local Programs that Increase Employability. One county noted that when policy changes were clear, further clarification was not necessary, but sometimes implementing a new policy or policy change required face-to-face training or videos. Nevertheless, reference guides or worksheets were essential in facilitating the application process.

Applications are submitted in person, via mail, online through the county platform, or through GetCalFresh.org (an online application developed and serviced by Code for America). Most eligibility workers agreed that receiving online applications through GetCalFresh.org expedited or simplified the application process. Several staff members noted that GetCalFresh.org advertises that it takes 10 minutes to complete the...
application and is thorough in terms of collecting information on special circumstances and potential exemptions. One eligibility worker (no. 10) shared that they prefer receiving student applications through GetCalFresh.org because it “generates [a] document form to see if that student is eligible for any exemptions,” saving staff from having to go through each exemption. Another eligibility worker (no. 12) echoed this sentiment, stating that the tool’s eligibility screener is “definitely helpful” in alerting workers on what verifications need to be requested. Another frequently mentioned advantage of GetCalFresh.org was the website’s “user-friendly” interface.

Campus partnerships are perceived as critical for application determination. Many participants spoke about the importance of collaborating with local universities. In the few cases in which eligibility workers had direct communication with campus financial aid staff, student verifications were easier to obtain from campus staff than from students who were unclear about which documents to submit and/or where to find them. One policy specialist shared their experience that emailing questions to financial aid office staff regarding student exemptions not only led to more timely student application processing but also improved county training. In another county, an eligibility worker (no. 18) discussed how a partnership between the county and the local university allowed for the development of a standard verification letter from the university’s Education Opportunity Program Office, which “[made] it easier for students to apply and get approved.” Several staff members in counties without partnerships with their local campuses spoke about wanting to foster stronger connections.

Tracking Policy Changes is burdensome

Despite some counties offering resources to help with student eligibility determination, many eligibility workers communicated having to track new, revised, and temporary policies individually. Staff were typically informed of policy changes through email or team meetings. However, 1 eligibility worker (no. 16) shared that “it’s usually more on the discretion of the worker to keep up to date with the ongoing eligibility changes” by taking the initiative to read through updates and contact the policy team or a supervisor with questions. Staying updated on policy changes, particularly COVID-19-related modifications, was overwhelming, with another eligibility worker (no. 17) stating, “I can’t memorize all this information...we get constant changes and updates, especially right now.” Some eligibility workers kept updates organized with desktop folders and email inbox labels. Some mentioned relying on memory when reviewing student exemptions, a practice which, in conjunction with frequent policy changes, could result in wrongfully denied applications. For example, an eligibility worker (no. 1) shared having to redetermine a student who qualified for CalFresh under the temporary COVID-19 modifications but was previously denied on the basis of pre-pandemic policy. The eligibility worker emphasized that changes in policy are regular occurrences, but if a worker misses an update, it does a disservice to the student.

Eliminate the Student Rules

Slightly over half of county staff recommended eliminating the student rules and treating students as usual clients. These staff felt that administering the student rules was complicated and required extra effort to implement. Several staff members voiced that they did not feel that the student rules were equitable, noting the extra “hoops” students had to overcome to be eligible. One policy specialist expressed that “doing away with the student eligibility requirements, in general, would be fantastic” and that keeping the pandemic modifications would be “ideal.” A training officer from another county stated that it seemed “backwards not to support somebody that’s seeking higher education,” which could improve their future financial and overall well-being.

DISCUSSION

This study aimed to better understand the student SNAP application process from the perspective of county agency workers in California. We identified 5 themes: (1) a need for more consistency in policy dissemination and program administration, (2) student exemptions and the application process are perceived as challenges for students, (3) facilitators of successfully processing student SNAP applications, (4) tracking policy changes is burdensome, and (5) eliminate the student rules. These findings could potentially offer insights to inform policy related to improving SNAP access among college students who are SNAP-eligible but among whom SNAP participation is low.

We identified variability in SNAP administration across 9 California counties, pointing to the need for more consistent policy dissemination and administration. Inconsistent channels of communication with students highlight a potential disparity in SNAP access in counties that are less technologically advanced. In the absence of consistent training, policy specialists developed guides, and eligibility workers created cheat sheets or quick guides in an attempt to implement the student eligibility rules, which demonstrates the administrative burden involved.

Determining SNAP eligibility and the application process were perceived as challenging for students and burdensome for eligibility workers. The taxing process illustrates the ways in which federal policy limits students’ access, such that the administrative burden may outweigh the intent of the program. Nevertheless, similar obstacles have been noted among SNAP applicants who are older adults, parents, and working adults. Maintaining benefits was another issue, given that all information is provided upfront when students are mainly concerned about completing the application, a finding also documented in older adults. This study fills a gap in the literature regarding the challenges faced by county agency workers who assist and process students’ applications. These findings align
with the experiences of university staff who provide guidance to students who apply for SNAP benefits. 14 Altogether, these findings support the need to simplify the student SNAP process. 11,15 Clearer information regarding how to apply for and maintain benefits is required. 11 Equitable access to SNAP for eligible students is an important direction for future research and policy. To that end, to better assist eligible students, tracking student SNAP enrollment is critical, but state systems are lacking. Tracking student SNAP enrollment at county and state levels could identify effective practices. For example, a recent report estimated the proportion of UC students enrolled in SNAP by campus and identified that students from historically minoritized racial and ethnic groups and low-income are more likely to be enrolled in SNAP, indicating that SNAP fills an equity gap in food access among college students. 33 Understanding the characteristics of students who apply and enroll in SNAP would provide critical information regarding equitable access.

We identified several best practices among the 24 participants interviewed. A county-campus relationship resulted in a more efficient process for student verifications. 14 GetCalFresh.org by Code for America streamlined the online application, 28 which was a helpful resource for workers. Yet, despite progressive attempts to improve SNAP access to eligible students, barriers remain. To address the barriers further, California recently enacted Assembly Bill 1326, 34 which requires a county agency to designate a staff liaison to serve as a point of contact for campus counselors and professionals in institutions of higher education located within the county. This policy aims to facilitate a connection between the county and state colleges and improve access to social services for students in need.

Of note, the timing of this study resulted in a natural experiment such that we captured COVID-19-related SNAP modifications that streamlined the student application process and reduced administrative burden (Figure). Federally, this included temporarily expanding SNAP eligibility to students eligible for work-study or with 0 EFC at the federal level and waiving student verifications and interviews at the state level in California (CA).

Several limitations are worth noting. Because of confidentiality related to staff roles, we did not collect participants’ demographic information. Of the 7 group interviews, 4 included a participant with a management role, which may have introduced potential bias among nonmanagement eligibility workers but mainly provided additional context that was beyond the role of the eligibility workers. Another limitation is the potential difference in information discussed in individual interviews vs group interviews. The use of an interview guide and trained facilitators could have helped to address this limitation, such that all participants had the opportunity to discuss the same topics. In all cases, eligibility workers were informed that their responses were confidential within the group. Finally, although a range of counties were represented, findings may not be generalizable to counties without a UC campus. A strength of this study was the inclusion of county agency staff who process student applications who are a hard-to-reach population. To our knowledge, this is the first study to contribute to a deeper understanding of the SNAP application process, particularly after students

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**Figure.** Examining themes regarding the student Supplemental Nutrition Assistance Program (SNAP) application process for SNAP-eligible students at the federal, state, and student levels. CA indicates California; EFC, expected family contribution; SAR-7, Semi-Annual Report. Note: Green lines demonstrate the complex processes involved in getting students through the application process. Blue lines demonstrate a more direct process as a result of the pandemic-related modifications, which included temporarily expanding SNAP eligibility to students eligible for work-study or with 0 EFC at the federal level and waiving student verifications and interviews at the state level in California (CA).
have received SNAP outreach from campus staff and submitted their applications. Future studies could examine how student SNAP applications are processed and how benefits are determined in other US states.

**IMPLICATIONS FOR RESEARCH AND PRACTICE**

The findings from this study have several policy implications. First, federal pandemic-related modifications are an example of how the SNAP process could be streamlined to benefit students who meet SNAP requirements. Second, findings suggest that the student eligibility rules from the 1970s (based on the assumption that middle-class students were accessing SNAP) are outdated for contemporary students who are more often from ≥1 underrepresented groups. The National Strategy on Hunger, Nutrition, and Health recently acknowledged this sentiment. The shrinking American middle class and current economic downturn provide additional context and support for increasing SNAP access to college students by either eliminating student rules or expanding SNAP to low-income college students.

Another policy implication is that our findings are in support of the Federal Enhance Access to SNAP (EATS) Act of 2023, which would allow the pursuit of postsecondary credentials to be considered work participation for SNAP eligibility purposes. If passed, it would create uniformity throughout the nation and overcome inconsistencies in how state administrators decide which students access benefits. The bill has been recommended for inclusion in the 2023 Farm Bill. Finally, this study focused on SNAP, from which undocumented students are prohibited despite disproportionately experiencing food insecurity. Therefore, advocating for programs at the state (eg, *California’s Food Assistance Program*) or federal levels, regardless of immigration status, is critical.

Our findings illustrate that the SNAP student rules are challenging for students and those involved in the implementation of the rules. Standardized county training that is regularly updated and better guidance on student policy changes for eligibility workers could create equitable access for students. Current best practices for improving SNAP access among college students include having a close relationship between county agencies and campus partners to verify. California’s Assembly Bill no. 1326 should help improve SNAP access, and Assembly Bill no. 396 should further simplify the process. Future research could evaluate the effectiveness of the latter policy as potential evidence to support the EATS Act. The utmost solution would be to expand SNAP to low-income students, which would lend more equitable SNAP access for college students.

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