Helping College Students Get *Supplemental Nutrition Assistance Program*: Facilitators of and Barriers to Students Accessing the *Federal Nutrition Assistance Program*

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ABSTRACT

Objective: To identify effective practices for assisting college students with *Supplemental Nutrition Assistance Program* (SNAP) applications and explore challenges in student SNAP enrollment.

Design: In-depth interviews with key informants on experiences assisting college students with SNAP applications.

Setting: University of California campuses.

Participants: Twenty-one key informants, including staff from the University of California on-campus *Basic Needs Centers*, campus financial aid offices, county agencies, and food banks.

Phenomenon of Interest: Facilitators and barriers of college student SNAP enrollment.

Analysis: Transcripts were coded to identify emerging themes.

Results: Two of the most frequently mentioned facilitators were county staff presence on campus for application assistance and a strong relationship between campus staff and the county SNAP agency. A common barrier was inconsistent student SNAP eligibility information and procedures across county offices.

Conclusion and Implications: Federal coordination with state agencies on student SNAP policy is much needed. This approach could help to eliminate heterogeneous interpretations of student exemptions across counties and between county staff. Future research is warranted to identify policy leverage points at the county, state, and federal levels, such as eliminating the student rule, to ensure equitable access to SNAP among college students.

Key Words: *Supplemental Nutrition Assistance Program*, college students, food insecurity, food assistance, nutrition policy (*J Nutr Educ Behav*. 2022;54:422−431.)

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INTRODUCTION

Food insecurity in higher education has gained increasing attention as a critical public health issue.[1−3] The US Department of Agriculture (USDA) defines food insecurity as limited or uncertain access to healthful foods.[4] A 2015 systematic review reported that the prevalence of food insecurity was 3 times higher (43%) among college students than in US adult households (13%).[2] A review of food insecurity in higher education found that 44% of students experienced food insecurity, similar to that in the University of California (UC) system.[5] The high prevalence of college student food insecurity may be due to the all-time high cost of tuition and fees, unaffordable housing, and limited financial aid.[6−8] Food insecurity threatens students' health and academic success, including persistence and degree completion; the issue has increased policy attention.[9−14]

The *Supplemental Nutrition Assistance Program* (SNAP) is designed to address food insecurity, but college students have been prohibited from participation unless specific exemptions are met as part of the student eligibility rule. Federal policy dictates that college students are categorically ineligible for SNAP benefits.[15] This student rule was added to the federal SNAP policy in the 1970s on the basis of the assumption that most students were from middle-income families

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and had sufficient financial support. Therefore, it did not require federal assistance.[14,16,17] In 1977, the student eligibility rule was enacted, which resulted in approximately 200,000 college students losing their SNAP benefits.[17] Forty years later, the assumption of familial support is not supported; today's college students are increasingly diverse, older, with child dependents, or from low-income families, but SNAP rules remain unchanged.[18−21] Students may be exempt from the federal student rule if they meet at least 1 exemption criteria (Supplementary Table 1). Even after meeting these criteria, further conditions apply, such as working at least 20 hours a week and having an income below a maximum threshold.[15]

Supplemental Nutrition Assistance Program legislation allows each state to administer the program in accordance with federal guidelines. In California, SNAP is known as *CalFresh*, and the program is administered jointly through the state-level California Department of Social Services and county agencies. These county agencies are responsible for processing *CalFresh* applications, determining eligibility, and distributing the funds. Counties must follow state *CalFresh* guidelines when determining eligibility, but interpretations of eligibility legislation can vary between California's 58 counties. In California, rates of *CalFresh* participation among eligible college students are persistently low.[22,23] In 2018−2019, fewer than 15% of eligible public university undergraduates received *CalFresh*, which left more than a hundred million *CalFresh* dollars in available federal funds unused.[22]

Few studies have examined student SNAP utilization and its implications for student food security. In 2018, the US Government Accountability Office (GAO) conducted a national study exploring how federal programs assist college students experiencing food insecurity.[18] The study found that SNAP has great potential to address student food insecurity for low-income students, but that the lack of clarity around student eligibility at the federal level hindered state and local efforts to enroll students.[18] According to the report, less than half of the

3.3 million SNAP-eligible students, were receiving SNAP benefits.[18] The report noted the high prevalence of campus programs across diverse university systems that help students sign up for SNAP and other benefits.[18] Recommendations set forth by the USDA Food and Nutrition Service (FNS) included: (1) making student eligibility guidelines accessible and easy to understand, and (2) federally coordinating efforts to help state agencies enroll eligible students in SNAP.[18] The FNS partially concurred and responded that it would review and revise the language on their website; and consider better strategies for information sharing and dissemination (eg, policy memos, webinars) with state SNAP agencies.[18] As of May 2021, the GAO is still waiting for FNS to address these recommendations.[18] Recently, a study cited the restrictive and confusing federal policy on student SNAP eligibility as a major cause of the low participation rates among students.[14] Stigma, application process complexity, and caseworker errors were identified as barriers preventing eligible students from enrolling in SNAP.[14]

There is a need to explore the factors driving low student enrollment in SNAP and identify programs and policies that increase enrollment. As such, the current study had 3 goals: (1) identify effective practices for assisting students through the SNAP application process, (2) identify common challenges to the SNAP application process for students among campus staff and community partners who provide SNAP application assistance to college students, and (3) to provide recommendations for practitioners working to improve the student SNAP application process.

METHODS

Study Context

The SNAP (hereafter referred to *CalFresh* when describing the UC student application process) student application process involves time-sensitive steps. First, students must determine whether they are eligible to apply by meeting at least 1 student exemption. If the student meets an exemption, they can complete an initial online or in-person application at the county

agency office. After completing the initial application, they must submit verification documents (eg, federal Pell grant receipt, work-study, student enrollment, etc) supporting their student status and exemption and complete a phone interview with a *CalFresh* county eligibility worker. Applications are processed within 30 days unless they meet high-risk criteria for expedited processing. Approved applicants receive a California Electronic Benefit Transfer card containing *CalFresh* monthly funds (up to $194 monthly for a single person before the coronavirus disease 2019 [COVID-19] pandemic). After 6 months, *CalFresh* recipients must submit a Semi-Annual Eligibility Status Report (SAR-7) to their county office to keep their benefits. The SAR-7 requires reporting any changes in income in the last 6 months and verification of such changes. After successful completion of the SAR-7, recipients must submit annual eligibility status reports.

This study took place within the context of the UC *Basic Needs Center* program at each campus of the public 10-campus UC system. These centers offer campus food pantries as an emergency response to food insecurity and *CalFresh* application assistance as a longer-term solution. *CalFresh* application assistance provided by UC *Basic Needs Centers* includes: (1) conducting outreach to improve *CalFresh* awareness, (2) prescreening applicants, (3) explaining exemptions, so students know whether they qualify, (4) helping students complete the application form, (5) helping with verification documents, (6) providing guidance on what to expect in interviews with *CalFresh* county staff; and (7) providing information on due dates, especially for renewals.

Study Sample

In-depth in-person or phone interviews (30−60 minutes) with 21 key informants were conducted between June and August 2019. Inclusion criteria included regular engagement in *CalFresh* student outreach at a UC campus to provide application assistance to college students. This included campus *Basic Needs* staff who oversee or provide student *CalFresh* assistance and campus partners,

such as food bank and county staff who worked onsite to assist with student *CalFresh* outreach and assistance. Potential participants were recruited by contacting the *Basic Needs* staff at each campus using phone or email and inviting them to participate in the study. In addition, *Basic Needs* staff were asked to identify any community partners who frequently provided student CalFresh assistance on campus. Identified community partners were then invited to participate. Representation was determined by including at least 1 *Basic Needs* staff from each campus who worked on *CalFresh* assistance. Not all *Basic Needs* staff had a working relationship with a community partner, limiting community partner representation. The purposive sample included 15 UC *Basic Needs* staff (at least 1 per UC campus), 1 county *CalFresh* eligibility worker (referred to as county staff), 3 food bank staff, and 2 UC financial aid staff. Data collection continued until staff from all UC campuses and participating community partners identified by *Basic Needs* staff were included.[24] The current study was reviewed by the Institutional Review Board at UC Irvine and determined not to be human subjects research; therefore, Institutional Review Board oversight was not required.[25]

The interviews were conducted by a single trained interviewer who used an interview guide with open-ended questions (presented in Supplementary Table 2). The interviewer had previous experience collecting field notes and conducting interviews with college students regarding food and housing insecurity. In addition, the principal investigator trained and guided the interviewer on using the interview tools. Questions were focused on the participants' role in providing student application assistance, experience partnering with organizations, and facilitators of and barriers to student application completion. The interview guide was developed by content experts, with knowledge and anecdotes of how the *CalFresh* application assistance program functioned at the University of California. The draft of the interview guide was shared with the UC systemwide *Basic Needs* leadership, who were working to improve processes regarding student *CalFresh* application completion. Stakeholders provided critical feedback, and the draft was revised accordingly. The interviews were semistructured to further probe topics relevant to the research question. The interviewer transcribed the meeting by taking extensive handwritten field notes during each interview discussion, including verbatim quotes. Immediately following the interview, the notes were reviewed, at which point high-level detail was added to ensure that main points and ideas were accurately captured. The interviewer typed each transcript within 1 week of each interview. Interviews were not audio-recorded not to impact the informality of the interview as new relationships were being developed.[26]

Analysis

In-depth typewritten interview notes were manually coded.[26] We used a general inductive approach for thematic analysis and employed an iterative coding process guided by grounded theory.[27,28] Researchers coded the interview notes using initial open coding.[29,30] Another researcher then reviewed these codes and independently coded the interview notes, using the constant comparative method. Researchers further refined the codes using selective coding to group the codes into themes of common facilitators and barriers, which were further reviewed. Minor discrepancies in coding were resolved by the principal investigator, who worked with coders to reach a consensus. To improve trustworthiness and reduce bias, researchers limited prior knowledge of *CalFresh* application assistance programs. Investigator triangulation from multiple coders improved analytic reliability.[30] Finally, the findings and previous studies were synthesized to develop recommendations for future practice.[14]

RESULTS

Seven facilitators and 8 barriers were identified on the basis of interviews with key informants on their experiences assisting students with the *CalFresh* application process. The facilitators and barriers are described below and are summarized in the Figure.

Facilitators of Student *CalFresh* Enrollment Success

Facilitators of student *CalFresh* enrollment were (1) county staff presence on campus, (2) a strong relationship between campus and county staff, (3) expanding the availability of campus staff with the expertise to assist with student applications, (4) partnerships between campuses and community organizations, (5) increasing *CalFresh* outreach to students, (6) partnerships between campus *Basic Needs* and financial aid staff, and (7) using tools and processes to strengthen on-campus *CalFresh* assistance.

County staff presence on campus. Staff from 8 of the 10 campuses, 2 food banks, and a county agency stated that having county staff present on campus was an important facilitator for application completion. The county agency sent staff to the campus to help students complete the application, gather verification documents, and answer questions. The frequency of county staff visits varied between campuses.

County staff hosted scheduled office hours on campus or provided application assistance at larger *CalFresh* sign-up events. In-person interviews with county staff were beneficial because they eliminated the challenge of scheduling phone interviews and gave students access to county staff who often had better information than campus staff. Staff at 4 campuses emphasized the benefits of county staff visiting the campus during periodic *CalFresh* sign-up events. In some cases, students could complete a *CalFresh* application and attend a same-day interview during the sign-up event. These events allowed county staff to assist many students in a short timeframe, which was especially beneficial for campuses with limited county staff office hours on campus.

A strong relationship between campus and county staff. Because *CalFresh* administration is county-specific and

policy interpretations may differ, campus staff reported that having a strong relationship with the county agency was critical for successful student *CalFresh* enrollment. Staff at 5 campuses, at 2 food banks, and at the county agency stated that direct communication with the county agency facilitated successful student enrollment in *CalFresh*. When campus staff spoke directly with county staff to clarify a policy and advocate for students, they were better able to assist students. Some counties had dedicated a staff member to the campus, which helped build a strong relationship between the county and campus.

Expanding the availability of campus staff with the expertise to assist with student applications. Staff at half of the campuses spoke of the benefits of increased hiring and strategic training of *Basic Needs* support staff to assist with the high volume of student applications. Because it was often difficult for students to reach the county office, campus staff reported that contact between students and their staff greatly improved application success.

The campus staff effectively assisted students because they were a source of accumulated knowledge about the *CalFresh* application process. At 1 campus, staff members knew that students could use a screenshot of their financial aid status from their university account to verify their eligibility with the county. For students whose applications were incorrectly denied, staff's experiential knowledge of the appeal process improved the quality of student assistance. As a result, students who connected with campus staff for assistance with the application process were more successful in obtaining *CalFresh* benefits.

Partnerships between campuses and community organizations. Staff at 4 campuses reported mutually beneficial partnerships with their local food banks. Examples of the support provided by local food banks included outreach funds, staff to assist students with applications, tracking changes to state and federal enrollment policy, and facilitating

connections with county agencies. At 1 campus, the local food bank provided funding to hire students as *CalFresh Ambassadors* who hosted regular peer office hours to assist with *CalFresh* applications. The food bank oversaw the student application assistance program, which expanded the capacity of campus staff to meet student needs. Another food bank had dedicated staff members who frequently visited the campus to assist students with their applications. In 1 case, the food bank staff intervened to convince the county to accept financial aid screenshots as verification of *CalFresh* eligibility, which provided access for students to apply. Support from food banks or other anti-hunger organization staff helped expand the services offered because the campus staff was often at their capacity.

However, such partnerships created challenges when the partnering organization was an intermediary between campus staff and the county staff. When the partnering organization was understaffed or not fully trained, communication with the county about student *CalFresh* applications was slow, impeding enrollment and challenging to elevate high-need or time-sensitive cases. Successful partnerships maintained direct communication between the campus and county staff.

Increasing CalFresh outreach to students. At 5 campuses, campus staff identified increased outreach efforts as a cause of improved enrollment. The outreach efforts were diverse and creative among the campuses. Staff at 1 campus hosted a workshop on *Basic Needs* resources that reached more than 150 faculty and staff across various departments. After the workshop, faculty and staff were better prepared to inform students about *CalFresh* and other resources. Some campuses included *CalFresh* events at orientation to reach new students. Because students are eligible for an exemption from the student rule if they participate in the Educational Opportunity Program (EOP) (a support services program for historically underserved first-generation students), 1 campus sent out *CalFresh* information with admitted students'

EOP confirmation letters. At another campus, the local food bank hosted *CalFresh* outreach events in residence halls, which resulted in wider reach and increased *CalFresh* enrollment.

Partnerships between campus Basic Needs and financial aid staff. Staff at 4 campuses and 1 food bank emphasized the benefits of partnering with university financial aid offices. The financial aid office holds the necessary documentation to complete a *CalFresh* application, so a close relationship with this office streamlined the application process. Food bank staff who went to campuses discussed how being in close contact with financial aid staff benefited students who could quickly retrieve verification documents from financial aid, complete their applications, and receive benefits on the same day. For students with nontraditional income, such as 1-time fellowship payments, financial aid staff at 1 campus advocated for students by explaining this income to county staff. At 2 campuses, financial aid staff acted as outreach partners by emailing and/or texting eligible students about *CalFresh*.

Using tools and processes to strengthen on-campus CalFresh assistance. At 4 campuses, campus staff implemented strategic tools to improve the application processes. Staff at some campuses used software to gather the contact information for students who used *Basic Needs* services and then created an email listserv to share *CalFresh* information. Listservs greatly expanded outreach, given it is often hard to reach students who are *CalFresh* eligible. Another campus used scheduling software to track student appointments and a master tracker system to follow their *CalFresh* application status for case management. This system allowed staff to follow-up with additional resources when students were denied. Students often have their *CalFresh* application denied because university forms used for verification often do not include their identification information. Consequently, staff at 1 campus created a verification template with student information on the form for students in EOP. Students could then

send that form directly to the county to verify their EOP status, making it easier to complete the application.

At 4 campuses, staff reported that the website GetCalFresh.org, developed by the nonprofit Code for America, provided an easy online enrollment platform. In some cases, GetCalFresh.org was easier for students to navigate than the state *CalFresh* online application.

Barriers to Student CalFresh Enrollment. Barriers to student *CalFresh* enrollment were (1) inconsistent student eligibility information and procedures across county offices, (2) need for more on-campus staff or other staff to assist with student applications, (3) students struggle to submit verification documents and/or miss *CalFresh* phone interview, (4) misunderstanding regarding *CalFresh*, (5) long phone wait times to reach county staff, (6) graduate student eligibility issues, (7) student exemptions are unclear and too restrictive, and (8) limited capacity for outreach to eligible students.

Inconsistent student eligibility information and procedures across county offices. Staff at 9 campuses stated that inconsistent procedures and interpretations of student eligibility across county offices impacted student enrollment. This was because *CalFresh* is administered on a county level, and processes can vary between counties. When the student population of 1 campus lives in several counties, campus staff must coordinate with multiple counties to help students enroll in *CalFresh*. Because campus staffing can be limited, maintaining communication with multiple agencies was challenging. Students who moved from 1 county to another were required to complete a complex and slow transfer process. Students received conflicting information on eligibility between the different counties, which increased confusion and misinformation. In communication with county agencies, campus staff reported a high turnover of county staff, which contributed to inconsistency in county processes and information as it takes new staff time to learn the nuances of student eligibility. Staff at a county agency reported that when state *CalFresh* policy

changed, county staff struggled to keep up, resulting in inconsistent student eligibility information.

Need for more on-campus staff to assist with student applications. At 6 campuses, application assistance from *Basic Needs* staff and on-campus county staff visits did not meet demand. The time county staff spent on campus was not enough to provide services to students in need.

Students struggle to submit verification documents and/or miss CalFresh phone interviews. Students often did not submit the verification documents necessary for application completion or dropped out in the middle of the application process. Competing demands on students' time, such as classes or work, may have interfered with their application completion, but overall, the reasons for incomplete applications were poorly understood. The reasons for not completing the renewal process through the SAR-7 were partly known. At 1 campus, staff reported that students often did not submit the SAR-7 because students moved often and failed to update their address resulting in students missing the letter requesting a 6-month renewal. Students reported to their campus staff that SAR-7 forms were sent after the printed due date with no information on submission window periods, which misled students to believe that it was too late to submit the form, even though forms can still be submitted after the deadline fact.

Staff at 6 campuses and a county agency stated that students frequently missed their mandatory phone interview, which hindered enrollment. County staff called students from an unidentified number, and many students were unlikely to pick up a call from an unidentified number. Students also missed the call because of having been in class. Rescheduling a missed interview was often challenging, further delaying enrollment or completing the application process.

Misunderstanding regarding CalFresh. At 6 campuses, staff identified misinformation regarding *CalFresh* as a

barrier. Misinformation regarding *CalFresh* included the belief that it would complicate taxes, reduce financial aid, or affect immigration status. Some students with undocumented family members feared retaliation under the US Department of Homeland Security public charge rule.[31] Staff reported that students believed receiving benefits would preclude other Californians from needing food assistance and did not know that *CalFresh* is under-enrolled. Staff reported that students' parents feared losing benefits if their child/dependent applied as a student. Other students feared that the application process would be extremely complicated and burdensome.

Long phone wait times to reach county agency workers. Staff at 6 campuses reported long county call-center wait times when students tried to contact county staff. Excessive wait times made it difficult to find answers to application questions, delaying the application process and complicating interview rescheduling. This led to students dropping out of the application process.

Graduate student eligibility issues. Staff at half of the campuses and a county agency spoke of the additional *CalFresh* enrollment challenges faced by graduate students. Graduate students often received 1-time fellowship payments. The *CalFresh* eligibility criteria contains a monthly income cap, so any 1-time payment must be converted into a monthly income to assess eligibility. County staff often did not know that converting 1-time payments into a monthly income is necessary to verify *CalFresh* eligibility. Graduate students were 1 of the most challenged student groups in terms of *CalFresh* eligibility, given that they are not eligible for undergraduate need-based grants that automatically confer *CalFresh* eligibility.

Student exemptions are unclear and too restrictive. Staff at 4 campuses and 1 county agency stated that the student exemptions were difficult for students to understand and/or too restrictive. Staff at 1 campus described how student eligibility for some special cases is

unclear. To resolve this, they requested clarification from community partners who directly communicate with the county, and responses can be slow. Students who misinterpreted the policy were denied. These exemptions sometimes conflicted with campus policies, which prevented high-need students from receiving *CalFresh*. For example, when 1 campus increased the most affordable meal plan from 11 to 12 meals, students living on campus became categorically ineligible for *CalFresh*.

Furthermore, work exemptions also came into conflict with campus policy. Many campus positions were limited to 19 hours per week, but SNAP requires students to work 20 hours per week to qualify for a work exemption. Furthermore, students from out-of-state, international, or part of the Deferred Action for Childhood Arrivals program and Dreamer Act[32−34] did not qualify for any federal programs. Students who live with their family members, such as parents or a spouse, were required to submit their household members' income information, which added complexity and discouraged students from completing the application.

Limited capacity for outreach to eligible students. Staff at 4 campuses described lower enrollment because staff capacity limited outreach. Staff believed that they mainly reached the highest need students yet failed to reach many other students who could benefit from *CalFresh*. In 1 case, staff noted that EOP had 8,000 students on their campus, all eligible for *CalFresh*, but only a few 100 students applied for benefits each year.

DISCUSSION

This study identified 7 facilitators of and 8 barriers to the student *CalFresh* (hereafter referred to as SNAP) application process in the 10-campus University of California system. Two of the most frequently mentioned facilitators were county staff presence on campus and a strong relationship between campus staff and the county agency. The most frequently reported barrier was inconsistent student eligibility information and procedures across county offices. These themes centered on the on-campus engagement with the county-level agency.

We found that campus *Basic Need Centers* that partnered with county agencies, financial aid offices and/or food banks had improved the reach and impact of on-campus *CalFresh* assistance services. Direct communication between campus and county staff facilitated clarification of student eligibility policies and collaborative strategies to enroll SNAP-eligible students. Frequent hosting of county staff on campus to assist with student SNAP applications supported application completion. With staffing capacity, resources, local food banks, and established *CalFresh* outreach programs welcomed the opportunity to extend this outreach program to college campuses. These relationships required time to initiate and foster relationships with agencies (eg, California Association of Food Banks). Flexibility and creativity are required to build partnerships that fit within the community organizations' funding and mission. Working with university financial aid offices appeared to boost *CalFresh* application success when financial aid provided students with verification documents or provided outreach to eligible low-income students. The US GAO report noted that many universities had centralized and coordinated student support services, such as student food pantries, SNAP application assistance, and financial aid, to address food insecurity.[18] Our findings support that such coordination requires campus partnerships with food banks and county agencies to provide effective SNAP outreach for application success.

The USDA FNS has yet to address the recommendations provided by the US GAO to make student eligibility guidelines accessible and clear and to coordinate with state agencies to enroll eligible students in SNAP.[16] In our viewpoint, until then, more institutional and state support is necessary to scale up existing student *CalFresh* assistance infrastructure. Because limited staff availability (on campus or at the county office) was highlighted as a barrier to students accessing assistance, funding to increase staff alongside efforts to make the application process less taxing for students is warranted considering the competing demands on students' time. This finding is consistent with a report on college students and SNAP that recommended that universities train student-services personnel, students, and faculty to assist food-insecure students with enrolling in SNAP.[14] However, SNAP is a federal program with frequently changing policies, so federal coordination with state agencies is much needed for state agencies to better coordinate with college campuses. This approach could help eliminate heterogeneous interpretations of student exemptions across counties and between county staff, a commonly reported barrier that may lead to wrongful denials of SNAP-eligible students.

The work-hours exemption requires that students work at least 20 hours per week when many campus jobs are limited to 19 hours. In this case, students experiencing food insecurity would not access SNAP through the work-hours exemption. Decreasing or eliminating the 20-hour work rule may be a solution for low-income full-time students. Working at least 20 hours per week can be counterproductive to their full-time academic commitment.[35] This exemption is currently being challenged at the federal level by the Enhancing Access to SNAP Act, which would treat college attendance as work to determine SNAP eligibility.[36] This amendment would eliminate restrictive interpretations of the 20-hour work rule, thereby making it easier for students to qualify. Research shows that undocumented adults, including students, experience food insecurity at disproportionate levels in California.[37] In early 2021, California proposed Senate Bill 464, which would allow low-income undocumented immigrants to receive food-assistance benefits under the *California Food Assistance Program*.[38] As of July, 2021, Senate Bill 464 remains under discussion.

Implementation of the facilitators may help overcome barriers to accessing SNAP for students in need of food assistance (Figure). A strong relationship between campus and county staff may reduce inconsistent interpretation of student eligibility because of

clear communication. Increasing campus staff who assist with student applications and outreach may mitigate misunderstandings regarding SNAP. A partnership between campus staff and financial aid staff would address the complexities regarding graduate student eligibility. Leveraging partnerships between community partners (eg, local food bank or county agency) and campuses may allow for substantial scaling up of outreach and application assistance services and staff availability to meet increased student demand.

This study's and others' findings were used to provide recommendations at the federal, state, county, and campus levels (Table).[14,18] At the federal level, clarifying restrictive and unclear federal student eligibility policies would improve consistency at state and county levels as recommended by the US GAO.[14,18] In 2014, California approved Assembly Bill 1930 to clarify student exemptions,[39] but much work remains at the federal level. Eliminating the student rule would streamline the student application process. At the state level, a standardized state-mandated training on student eligibility for all counties could reduce inconsistent interpretations of student eligibility

between counties. Expanding call-center staffing to have a dedicated line for students would help students access timely and accurate *CalFresh* application information at the county level. Recommendations include hiring dedicated staff or increasing staff for SNAP outreach and assistance at the campus level.

The prevalence of food insecurity rose among Americans during the COVID-19 pandemic, including among college students.[40,41] The importance of SNAP as a safety net for Americans and the gap in college students having access to the program became quickly apparent. Because of pandemic-related campus shutdowns, in-person *CalFresh* assistance provided by county or food bank staff was suspended. However, campus *Basic Needs* staff transitioned to remote assistance to support students in need of *CalFresh* application assistance via individual and/or group appointments. Furthermore, given the rapid increase in unemployment because of the economic shutdown because of the pandemic, FNS temporarily expanded student eligibility to include students who have an expected family contribution of zero dollars and those who are eligible for work-study (regardless

of if they accept a work-study job).[42] Permanent implementation of these amendments would likely simplify the application process and improve student enrollment in SNAP. Further exploration of the impact of the COVID-19 pandemic on college student SNAP enrollment is warranted.

Several policy changes in California are underway to help students enroll in SNAP. In 2021, California Assembly Bill 396 was proposed, requiring California's State University and Community College systems (and requested for the UC system) to apply for their employment and training programs to be state-certified, such as SNAP student eligibility exemptions.[43] This is important because students participating in these state-certified programs qualify for an exemption to the student eligibility rule. This would allow campuses to identify which programs fit the criteria regarding training for employability, thereby increasing access to *CalFresh* among students, a subgroup of the adult population. In October, 2021, Assembly Bill 396 was approved. Also, in May, 2021, the California Department of Social Services released an All County Letter stating that verifying student exemptions is no longer mandatory.[44] California Department of Social Services is also preparing a student eligibility handbook for county staff who process student applications.

A strength of this study is the inclusion of participants from all 10 UC campuses, thereby representing the 1 state university system. In-depth interviews with the campus, financial aid, food bank, and county agency staff provided a deeper understanding of the range of roles involved in SNAP student access. A limitation of this study is the lack of representation of county agencies, wherein only 1 county staff member was interviewed. In addition, the study did not include student perspectives on the barriers to applying for SNAP, which merits future research.

Because these interviews were documented using extensive field notes, not all information may have been recorded. Despite this limitation, to our knowledge this is the first study to document the importance of
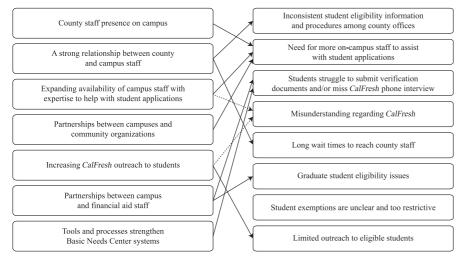

Figure. Examining facilitators alongside barriers to help overcome challenges related to accessing *CalFresh* (California's *Supplemental Nutrition Assistance Program*) for college students in need of food assistance. Solid arrows connect facilitators with the barrier they help address, as demonstrated by the data. Dashed arrows represent hypothesized connections between facilitators and barriers.

Table. Recommendations for *Supplemental Nutrition Assistance Program* (SNAP) and *CalFresh* Policy and Programs

Level	Recommendation
Federal	● Advocate for federal policies clarifying student eligibility. More detailed policies would reduce confusion and heterogeneity by county. ● Expand and modify exemptions to make SNAP accessible to high-need students, such as reducing the work hours required for student exemptions. Current student exemptions leave high-need students without *CalFresh*, especially graduate students with fewer exemption options and whose income is often nontraditional, such as lump sum, not weekly hours.
State	● Develop a state-mandated training for county-level workers clarifying student eligibility. Interpretations of student eligibility vary by staff within a county and across counties. A state-mandated standardized training clarifying student exemptions for county staff could reduce heterogeneity between staff and across counties. ● Provide funding to allow campuses to hire or expand existing campus services that provide SNAP outreach and assistance
County	● Support alternatives to the current phone interview process. Examples include allowing students to schedule interviews at a specific time, email and text message reminders of the upcoming interview, and expanding on-campus county staff conducting interviews. ● Invest in alternatives to and expansion of county call centers. Some call centers had wait times longer than an hour, limiting applicants' ability to reschedule interviews and ask clarifying questions. Campus staff and county intake workers who were assigned to campuses stood in for the call center, but this solution has been resource-intensive and further enhanced disparities between counties that do and do not have this infrastructure.
Campus	● Support regular hours for county (and food bank) staff members on campus whenever possible. When county intake workers and food bank outreach staff had an office on campus, student applications were faster, less burdensome, and more likely to be approved. Staff members formed relationships with campus administrators and became experts on student eligibility, which makes it easier for them to implement changes that improve student application success rates. ● Continue investing in outreach. Outreach will ensure that all student applicants receive technical assistance information from the county, food bank, and/or campus staff. Students were substantially more likely to complete the process and receive benefits if they applied through an assistance pathway. Outreach may also reduce stigma and misperceptions about eligibility. ● Support partnerships between university departments, financial aid departments, food banks, and county agencies. Centralized and coordinated student support services may reduce misinformation and reduce enrollment time.

community partnerships in providing students with *CalFresh* assistance. This study focused on 1 of 3 public systems in California; however, to our knowledge few state university systems have consistent *CalFresh* outreach across the campuses. Findings from this study may not apply to other individual campuses or university systems; however, the processes that occur between campus and county agencies are not unique to this population.

IMPLICATIONS FOR FUTURE RESEARCH AND PRACTICE

The current findings suggest that federal student exemptions may be unnecessarily restrictive and inconsistent with university practices. There is also a persistent conflict between the nuances of student SNAP eligibility and the limited capacity of campus programs, county agencies, and other community programs to assist students through the application process. This conflict can be further compounded by limited student time. Given the dependence of time-sensitive county-level procedures on student application success, future research should examine county-level SNAP processes to identify leverage points to improve student SNAP enrollment. Additionally, there is a need to consider the potential harm imposed by federal policy that prevents access to federal food assistance, particularly for undocumented students protected under the Deferred Action for Childhood Arrivals program and DREAM Act. Until SNAP policies are inclusive of college students in need of food assistance, making the application process more transparent, easier to understand, and faster to process is critical to improving application success. This can be achieved by building relationships with community partners to have county staff or a well-trained outreach partner from the local food bank on campus. Furthermore, future research is warranted to identify policy leverage points, such as eliminating the student rule, to ensure equitable SNAP access for all college students in need.

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SUPPLEMENTARY DATA

Supplementary data related to this article can be found at https://doi.org/10.1016/j.jneb.2022.02.008.

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