CLASP
Policy solutions that work for low-income people

State Options to Increase College Student Access to Public Benefits

Policies and Practices that Increase Student Success and Economic Security

Overview

This document discusses a range of policy and practice options that states can undertake to increase college student access to public benefits. CLASP has leveraged its hands-on policy and cross-issue technical assistance expertise to identify these options. Many states have already implemented one or more options, often through embracing state flexibility under federal law.

This document is intended to stimulate state discussion, research, planning, partnership building, and action. It also may be used to develop key messages to begin shifting the narrative from a deficit-based description of public benefit recipients to a focus on the importance of public benefits for college enrollment, success, and attainment. It does not describe policies or practices the federal government requires of all states or specifically disallows, limits discussion of state options that only peripherally impact college students, and is not intended to be a comprehensive list.

Each of the document's eight sections are discussed in relation to **college student** access to public benefits:

1. Cross-Program Access and Alignment
2. Improvements to Postsecondary Education Policy, Funding, and Practice
3. The Supplemental Nutrition Assistance Program (SNAP)
4. SNAP Employment & Training (E&T)
5. Temporary Assistance for Needy Families (TANF)
6. Child Care Assistance
7. Free or Low-Cost Health Insurance
8. Housing Assistance

Combining policies and practices within each, and across, these sections may produce better outcomes.

Note: This document allows you to keep track of current options implemented in your state and identify new options that are of interest. To do this, complete the column buttons and checkboxes, fill in the notes sections, and save the document. You may forward this document partially completed to others to complete. Use the "clear form" button at the end of the document only if needed.

Section 1: Cross-Program Access and Alignment

Cross-program access and alignment of public benefits programs such as SNAP, SNAP E&T, TANF, Medicaid, child care assistance and housing assistance for college students can significantly improve college attendance, success, and completion. While many college students with low incomes are eligible for multiple programs, the programs are often administered separately, requiring students to learn about, apply for, and submit documentation to each program separately. Even when a joint application is available, state-specific program design and policy choices may result in students participating in only one of the available programs. Some of these challenges can be addressed by cross-program access and alignment, including streamlining applications for multiple public benefits, integrating student outreach, and sharing data across benefits programs.

States may choose to embrace policies and practices that increase cross-program access and alignment as described in the following options.

State Option	Implementing?	Interested?
Collaboration and Buy-In States may choose to meet regularly across programs to collaborate on improved service delivery for students with low incomes. Multiple stakeholders may be engaged, including the state agencies addressing human services, workforce development, housing, education, postsecondary institutions, juvenile justice, health, and others. These collaborations provide an important platform to discuss points of intersection in the lives of low-income students and can be a central force for advancing positive, coordinated change. They can also be an opportunity to allow agencies that do not directly provide workforce training or education to be a part of the conversation. In one state example, Louisiana has created an education and workforce subcabinet comprised of nearly a dozen agency partners. The subcabinet takes on important issues such as reviewing workforce and economic data to ensure the state's workforce meets the needs of agencies, businesses, and communities. The subcabinet also takes steps to better coordinate the delivery and administration of public benefits and other programs across the participating agencies. To solidify buy-in, the collaborative can issue a letter communicating each agency's support of cross-program coordination and implementation of best practices to improve public benefit access for college	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/ technical assistance (TA)

State Option	Implementing?	Interested?
students. Topics for collaboration might include data sharing, policy reform and alignment, and opportunities to reduce administrative barriers. If desired, the collaborative could also conduct a comprehensive policy scan to identify opportunities to align SNAP, SNAP Employment & Training, TANF, child care assistance, housing assistance, free or low-cost health insurance, and postsecondary education policies.		
Cross-Program Policies and Verifications States may wish to work across programs to: • Develop consistent terms for students, countable income, or vocational education programs • Align recertification periods • Establish one student verification form that could be applied to any public benefit	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Cross-Program Communication, Outreach, and Enrollment States can coordinate enrollment efforts of public benefit programs in many ways, such as by communicating with existing recipients of one public benefit to enroll them in a second benefit, creating robust referral processes between benefits programs, or enrolling individuals in two or more public benefits at once. States can use communications methods such as sending application packets, pre-filled applications, letters, postcards, and texts or making phone calls to recipients of one benefit who are likely eligible for the second benefit. Application assisters or eligibility workers may conduct screening for eligibility in another program at the point of enrollment in the first program. Application assisters for a second benefit can also be outstationed at the first benefit program's site. States can also coordinate outreach efforts through dual promotional materials, dual outreach events, and case worker and community-based training on dual outreach and application assistance. Many states have streamlined applications across two or more public benefits programs. To make this happen, they have used methods including data-sharing to pre-fill application fields (resulting in shorter applications for recipients of two or more public benefits), a single application between programs, or making recipients of one program automatically eligible for another (referred to by terms such as categorical eligibility, adjunctive eligibility, or express lane eligibility).	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
Stigma and Public Benefits Stigma around public benefits—a negative association between the use of public benefits and individual deficits—is pervasive in the U.S. and impacts discussions about public benefit policies and practices, attitudes, legislative activity, and individual willingness to access much-needed benefits. By using key messages to overcome this stigma, states can begin to shift beliefs from deficit-based assumptions about public benefit recipients to a focus on the importance of public benefits for college enrollment, success, and attainment. Addressing stigma can include developing targeted messaging; identifying key audiences, mechanisms, and approaches to deliver the messaging; aligning with other stakeholders around shared messaging goals; and providing messages to key audiences on an ongoing basis.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

Notes:

Section 2: Improvements to Postsecondary Education Policy, Funding, and Practice

Postsecondary institutions can increase student access to public benefits through improvements to internal policies, dedicated funding, and implementation of new internal practices. The following is a sample of options and promising practices in this area of work.

State Option	Implementing?	Interested?
Collaboration and Buy-In Higher education institutions can meet regularly across departments (e.g., matriculation, student services, workforce, and instruction) and/or institutions (e.g., multiple colleges, the system office, and/or state agencies) to collaborate on improved service delivery for students with low incomes. These collaborations can develop a shared language, identify goals, and mobilize participants toward positive change. Examples of collaborative activities include conducting research on the challenges faced by low-income students; engaging in strategic planning to identify potential improvements to policy, funding and practice; undertaking statewide policy or administrative advocacy on behalf of students; engaging with higher education leadership to build champions; featuring basic needs security at a statewide college conference; and highlighting new state and federal policy changes. To solidify buy-in, the collaborative can issue a letter that clearly communicates a commitment to improve public benefits access for college students, identifies opportunities for engagement, and solicits cross-department and cross-agency support.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
State- or Locally Funded Student Financial Supports An increasing number of states offer free tuition to students who have limited incomes, either on a capped basis or for all students. This article describes a few state examples of tuition subsidization.		

State Option	Implementing?	Interested?
Other states have established a state-funded work-study program to increase students' employment options while in school. (Note: participation in state and federal work-study allows otherwise eligible students to qualify for SNAP without regard to the student restrictions.) States can use state or local dollars to establish an emergency student financial assistance fund for students. California's example allows colleges to reallocate service funds toward this purpose. To limit instances of award displacement for students with low incomes, higher education institutions may review institutional policies to identify how awards are prioritized, what income is counted, and how policies align with student preferences. They may also revisit existing data, like that provided in the Free Application for Federal Student Aid (FAFSA), to build a better understanding of the needs of students. States can also use FAFSA data to identify which students might have certain needs, and which part(s) of campus or the state these students might be.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Institutional Practices Although the focus of this assessment is on policies that can be adopted statewide, a number of individual institutions have identified activities to increase awareness of the availability of public benefit programs or to directly help students meet immediate needs. Please see below for examples.		
Multi-Benefit Outreach and Enrollment Assistance through Outside Organizations Many higher education institutions bring in outside organizations to support public benefits enrollment. These organizations may have an office on campus, come on site at regular intervals, bring a mobile unit on campus, or participate in community resource fairs at the beginning of the term. Examples of outside organizations include human services agencies, local nonprofit organizations involved in application assistance, or organizations such as Single Stop, a successful and prominent model that helps students enroll on campus.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Multi-Benefit Outreach and Enrollment Assistance through Internal Practices Postsecondary institutions have used many options to improve access to benefits for students with low incomes. Some options are described in individual public benefit sections. Examples of policies and practices that colleges have undertaken for multiple benefits simultaneously include:		

State Option	Implementing?	Interested?
- Telling students with a zero Expected Family Contribution (EFC) on the federal Student Aid Report (SAR) or who are eligible for work-study that they may qualify for additional supportive resources (this could be accomplished through the financial aid award letter or a work-study coordinator). - Ensuring that financial aid administrators are aware of the interactions between financial aid and public benefits. - Informing academic counselors about supportive resources for students who may be struggling. - Training other campus staff on how to ask students if they need support, how to talk about it with them, and to whom they can make a soft hand-off. - Educating faculty on the benefits of programs like work-study (which can allow a student to receive SNAP) and social support programs on campus and in the community, providing information sheets, and offering tips on how to share the information (e.g., incorporating it into their syllabi). - Incorporating information about basic needs support into freshman/new student orientation and information packets. - Using campus social media accounts to share information about resource support on- and off-campus. - Providing information about campus or community basic needs resources as part of campus resource fairs or student organization fairs. Campuses may already have some existing capacity to do this work but would need to be creative in choosing a place for it. For example, some institutions have seen good results from integrating tax preparation and benefits outreach into accounting and social work courses where students can earn credit for helping their peers. Other institutions provide incentives for students to serve as peer coaches and train these students on simple intake and support activities. Colleges can also provide information about benefit access through student success courses, career centers, student health centers, or on-campus food pantries. CLASP's Benefits Access for College Completion project worked at seven community colleges across the country from 2011 to 2014. These colleges integrated student services and benefits access within the financial aid or student affairs office. This initiative identified several critical success factors for successful internal enrollment assistance, including integration of the work into the everyday operations of the college, strong buy-in from leadership, and training of a range of staff that can provide different levels of engagement with students as needed.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

Section 3: Supplemental Nutrition Assistance Program (SNAP)

The U.S. Department of Agriculture's Supplemental Nutrition Assistance Program (SNAP) provides nutrition assistance to individuals and families with low incomes. SNAP is critical because food insecurity is one of the greatest threats to health, wellbeing, and academic success for college students with low incomes.[1]

A recent report from the Government Accountability Office (GAO) examined the extent of food insecurity on college campuses, including efforts to reduce student hunger and barriers to assistance.[2] The GAO report adds to growing attention and a body of research regarding undergraduate students and food insecurity. The report found that students with low incomes (39 percent of all undergraduate students) are at the greatest risk of being food insecure. Most of these students also experience additional risk factors, like being a first-generation student (31 percent of students) or a single parent (14 percent of students), that compound their likelihood of being food insecure.

For students with low incomes, removing barriers to SNAP can reduce food insecurity and improve student success.[3] Nationally, SNAP helps approximately 39 million people in nearly 20 million households put food on the table each month.[4] In 2017, SNAP lifted 3.4 million people out of poverty, including 1.5 million

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SNAP Student Work Rule Basics

Students enrolled at least half time in postsecondary education are often excluded from SNAP due to student eligibility restrictions. However, many low-income students do qualify for SNAP because they are working, taking care of children, or participating in a program aimed at employment and training, as defined below.

Specifically, students aged 18 to 49 enrolled in college at least half time are subject to SNAP eligibility restrictions unless they meet one or more of the following income criteria, eligibility criteria, or participation requirements:

- Receive public assistance benefits under a Title IV-A program of the Social Security Act;
- Participate in a state- or federally financed work-study program;
- Work at least 20 hours a week;
- Are unable to work for health reasons;
- Receive Temporary Assistance for Needy Families (TANF) cash assistance or services;
- Take care of a dependent household member under the age of 6;
- Take care of a dependent household member over the age of 5 but under 12 and do not have adequate child care to enable them to attend school, work a minimum of 20 hours, or participate in a work-study program; or
- Are assigned to or placed in a college or certain other schools through:
  - A program under the Workforce Innovation and Opportunity Act (WIOA) of 2014,
  - A program under Section 236 of the Trade Act of 1974,
  - An employment and training program under the Food Stamp Act, or
  - An employment and training program operated by a state or local government (see first state option below).

Student restrictions do not apply to individuals attending college less than half-time, as defined by the school. Restrictions also do not apply to individuals in an education program that does not require a high school diploma and is not a "regular" program of a college or university, even if most other students have a diploma.

children.[5] As a household's income increases, its SNAP benefit amount slowly decreases, providing a gradual transition that better supports work.[6] Similarly, because of the way SNAP deductions are applied, when the benefit amount is calculated, earnings are treated favorably to support wage growth and improve financial stability.

SNAP promotes educational attainment by providing a modest assurance that people are able to first meet their most basic human need for food. Studies have shown that without access to food and proper nutrition, people can suffer from exacerbated stress, anxiety, and depression;[7] sleep disturbances and fatigue; and impaired cognitive functioning.[8] Access to SNAP relieves stress, improves vitality, and allows students to focus their energy on improving their educational and employment outcomes. The SNAP program has been shown to support work,[9] stimulate economic growth,[10] improve academic outcomes for children,[11] and improve health outcomes for recipients.[12]

Unfortunately, an estimated 57 percent of potentially eligible college students do not participate in the program.[13] Research has identified significant student confusion and misunderstandings about student SNAP eligibility due to complex student eligibility rules. While many students may qualify for SNAP, schools or state SNAP agencies typically need to make a deliberate effort to focus on benefit access to ensure they make eligible students aware of the program and support them in the enrollment process.

Many states have implemented policies and practices that embrace state flexibility under federal law in the areas of the student criteria (listed above) or elsewhere in the SNAP program. The following is a sample of options and promising practices.

State Option	Implementing?	Interested?
Student Rules and Participation in Training and Work Programs Students are not subject to student eligibility rules when participating in TANF work programs, Workforce Investment and Opportunity Act (WIOA) Title I programs, SNAP Employment and Training (E&T) programs, Trade Adjustment Assistance programs, or other programs equivalent to Employment and Training components operated by a state or local government. A number of states have deemed certain programs equivalent to an Employment and Training program through state legislation or regulation following approval from the U.S. Department of Agriculture, including Illinois, Massachusetts, Pennsylvania, New Jersey, and California. In order to deem certain programs eligible at scale, SNAP agencies can work with higher education institutions to identify broad categories of courses and programs at two-year colleges that could be	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
determined equivalent to an Employment and Training program. Examples include career and technical education courses as defined in the Perkins Act; approved career pathway programs; remedial courses, basic adult education, literacy, or English as a second language that are contextualized or concurrent with career and technical education; and student support programs (even when outside of SNAP E&T) that can qualify more students subject to SNAP student rules. See these downloadable examples from California and Pennsylvania. Some states use TANF funds to provide financial aid or supportive services to certain low-income students. Receipt of these services may qualify students to receive SNAP benefits.		
Student Rules and Averaging Work Hours Some states have acknowledged the reality of variable scheduling that dominates many businesses and does not guarantee students – or any worker – predictable hours in a given week. These states deem that the 20-hour weekly standard under SNAP student eligibility rules can be met by averaging hours over a month to meet a minimum standard of at least 80 hours. Averaging hours can improve student access to SNAP, simplify paperwork, and reduce churning that results from unpredictable student work schedules. See this downloadable example.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Student Rules and Verification of Student Status Several states have standardized the student status documentation process so that no matter which human services office a student has contact with or which college they are enrolled in, there is a clear evidence standard. See the Massachusetts downloadable education verification form and release of information form created for the purpose of determining eligibility under student rules.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Student Rules and Work-Study Students subject to student eligibility rules are eligible for SNAP if they take part in a state or federal work-study program during a specific school term. States can use state work-study funding strategically to increase student eligibility for SNAP. In addition, states can improve communication about SNAP and work-study. For example, a new law in California mandates creation of a standardized work-study form that will help SNAP agencies verify that a	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
student is approved for work-study, and requires community colleges and universities to explain and distribute the form to all students approved for work-study.		
SNAP Eligibility and Worker Training Case workers often experience difficulty in determining which students are subject to the student eligibility rules or are otherwise eligible. Some states provide repeated, in-depth training to case workers on student eligibility and verification. Trainings can ensure that case workers know that students can self-attest their enrollment in college during eligibility and recertification and that students who receive a limited number of meals through their campus meal plans are still eligible for SNAP. Case workers can also be trained to carefully explain the interaction between those time limits, work requirements, student rules, and participation in SNAP E&T to people subject to the SNAP time limit.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
SNAP Outreach and Application Assistance Student outreach and application assistance is a key strategy for SNAP enrollment. Staff from nonprofit agencies, colleges, and/or the SNAP agency can provide support both on and off campus (e.g., through community resource fairs, outstationed eligibility workers, etc.) Specific eligibility workers can be selected as a point of contact or resource for college students or those assisting them in applying. Application assisters can be asked to troubleshoot denied applications and/or support the recertification process. SNAP outreach dollars may be available for outreach and application assistance efforts. Some states provide student information materials at each postsecondary institution, intermediary, and human services agency. The materials can promote enrollment in SNAP and SNAP E&T, explain student eligibility/verification processes, tell stories of SNAP students, reduce stigma, confirm that many students qualify for SNAP, and identify a point of contact for students. Examples of materials include posters, flyers, brochures, videos, the online application, pre-screening tools, and other narratives. Administrators can use these materials in waiting rooms, referral agencies, outreach events, staff/faculty offices, websites, social media, newspapers/television, mailings, financial aid offices, and other campus locations. Some states have also had success using texting campaigns to encourage enrollment. Finally, states have also found data-sharing to be a useful tool in identifying SNAP eligible students, if privacy rules allow it. For example, Illinois Senate Bill 1641 places requirements on the student aid commission, human services, and colleges to increase data-sharing to identify college students who may	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
be SNAP-eligible and to proactively reach out to students and provide information about SNAP. States can also reach out to families receiving SNAP who have high-school-age children to share information about how their children may be able to maintain eligibility for SNAP when they go to college.		
Acceptance of SNAP Benefits at Campus Stores Higher education institutions can ensure that all appropriate campus stores have been approved to accept SNAP benefits. To be approved, stores must either offer a varied inventory of staple foods (staple foods exclude prepared, heated, or accessory foods) or if their inventory lacks variety, have more than 50 percent of total gross retail sales from the sale of staple foods. Exceptions may be made to these rules if stores are in an area where SNAP recipients have limited access to food.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

[1] https://www.clasp.org/publications/fact-sheet/snap-and-students-food-assistance-can-support-college-success.

[2] U.S. Department of Agriculture, "SNAP Participation," Food and Nutrition Service, September 2018, https://fns-prod.azureedge.net/sites/default/files/pd/34SNAPmonthly.pdf.

[3] Liana Fox and Laryssa Mykta, "Supplemental Poverty Measure Shows Who Benefits from Government Programs," *U.S. Census Bureau*, September 2018, https://www.census.gov/library/stories/2018/09/supplemental-nutrition-assistance-program-lifts-millions-out-of-poverty.html.

[4] Adrienne O'Neil, Shae E. Quirk, Siobhan Housden, et al., "Relationship Between Diet and Mental Health in Children and Adolescents: A Systematic Review," *American Journal of Public Health* vol. 104,10 (2014): e31-42, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4167107/.

[5] Michael W. Green, Peter J. Rogers, Nicola A. Elliman, and Susan J. Gatenby, "Impairment of Cognitive Performance Associated with Dieting and High Levels of Dietary Restraint," *Physiology & Behavior* 55.3 (1994): 447-452, http://www.seven-health.com/wp-content/uploads/2018/08/Impairment-of-Cognitive-Performance-Associated-with-Dieting-and-High-Levels-of-Dietary-Restraint-.pdf.

[6] Dottie Rosenbaum, "The Facts on SNAP, Part 2: SNAP Supports Work," *Center on Budget and Policy Priorities*, May 2013, https://www.cbpp.org/blog/the-facts-on-snap-part-2-snap-supports-work.

[7] Nune Phillips, *SNAP Contributes to a Strong Economy*, Center for Law and Social Policy, August 2017, https://www.clasp.org/sites/default/files/SNAP-Contributes-to-a-Strong-Economy.pdf.

[8] Nisha Beharie, Micaela Mercado, and Mary McKay, "A Protective Association between SNAP Participation and Educational Outcomes Among Children of Economically Strained Households," *Journal of hunger & environmental nutrition* vol. 12,2 (2016): 181-192, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5513186/.

[9] Steven Carlson and Brynne Keith-Jennings, *SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs*, Center on Budget and Policy Priorities, January 2018, https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-nutritional-outcomes-and-lower-health-care.

[10] "Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits," *U.S. Government Accountability Office*, January 2019, https://www.gao.gov/products/GAO-19-95.

[11] Amy Ellen Duke-Benfield and Katherine Saunders, *Benefits Access for College Completion: Lessons Learned from a Community College Initiative to Help Low-Income Students*, Center for Law and Social Policy, July 2016, https://www.clasp.org/publications/report/brief/benefits-access-college-completion-lessons-learned-community-college.

[12] Ibid., 11.

[13] Carrie Welton, *Proposed House Farm Bill Would Harm Workers, Bring Back "Cliff Effects"*, Center for Law and Social Policy, April 2018, https://www.clasp.org/publications/fact-sheet/proposed-house-farm-bill-would-harm-workers-bring-back-cliff-effects.

Notes:

Section 4: SNAP Employment and Training (E&T)

The U.S. Department of Agriculture's SNAP E&T program funds training, education, or work experience to improve the employability of SNAP participants. Along with a small grant fund program for each state, SNAP E&T reimburses 50 percent of service provider funds invested in countable activities for SNAP recipients. These funds may not be from any federal program other than Community Development Block Grants or Indian Tribal Organizations or used to meet match or Maintenance of Effort (MOE) requirements.[14]

States are required to administer a SNAP E&T program yet have significant flexibility over its size and design. They may prioritize which SNAP participants to serve, which services are offered, and which organizations will provide the services. Service providers may range from the state itself to community colleges, community-based organizations (CBOs), or workforce development partners. When SNAP E&T providers other than the state fund new and existing countable activities to draw down the 50 percent reimbursement, they are referred to as "third-party partners." Some states have failed to fully utilize SNAP E&T by limiting or not engaging with third-party partners.

SNAP E&T can fund many postsecondary costs that can improve student success, such as career counseling, tutoring and mentoring, case management, internships, apprenticeships, job placement services, and help with student tuition, books, transportation, and dependent care. SNAP E&T can also allow students subject to student eligibility rules to qualify for SNAP.

Many states have implemented policies and practices that embrace state SNAP E&T flexibility under federal law. The following is an overview of community college participation in SNAP E&T.

State Option	Implementing?	Interested?
Colleges as SNAP E&T Third-Party Partners Postsecondary institutions in many areas of the country operate SNAP E&T programs that offer skills-based and job-driven vocational training, education, or work experience components; address barriers to SNAP E&T participation and employment through client supports such as transportation and textbooks; and provide industry-recognized credentials and degrees. These programs improve student employability and increase access to SNAP due to student eligibility rules. Colleges that serve as third-party partners are typically reimbursed for half of their spending on eligible expenses. Some colleges partner on SNAP E&T with community-based organizations (CBOs) as part of a career ladder program, and some work through a	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
college intermediary organization that handles many of the administrative responsibilities of the program. Colleges are required to share data with their SNAP agency to meet federal requirements.		
Additional State Options For additional U.S. Department of Agriculture resources that highlight innovative state strategies and opportunities within the SNAP E&T program please click here.		Want tips/TA

[14]Under TANF and some other federal programs, states are required to spend some of their own dollars on similar activities at a level which is not less than expenditures for such activities during the fiscal prior year, known as the "maintenance of effort" (MOE) requirement.

Notes:

Section 5: Temporary Assistance for Needy Families (TANF)

The Temporary Assistance for Needy Families (TANF) program provides basic cash assistance for certain very low-income families with children. States receive funding from the U.S. Department of Health and Human Services (HHS) in the form of a block grant and have broad flexibility to design their TANF programs. States have used their TANF funds for a range of services and supports, including cash assistance (such as wage supplements for families earning low incomes), child care, education and job training, transportation, aid to children at risk of abuse and neglect, and a variety of other services to help families with low incomes.

Cash assistance helps low-income families with few assets through difficult times. Families with children often use cash assistance for needed stability when facing an unexpected change, such as losing a job, giving birth, fleeing domestic violence, or experiencing a serious medical issue. Studies show that poor children who receive income support have better long-term outcomes in school, earn more as adults, and report having better health.[15]

Unfortunately, TANF's usefulness as a safeguard for families against extreme financial deprivation and racial inequities has declined dramatically over time.[16] Currently, less than 800,000 adults nationwide receive cash assistance under TANF. Moreover, due to a combination of TANF work participation rate requirements, various federal regulations, and a general "work first" approach, few states offer people receiving TANF the opportunity to participate in education and training programs.

The following is a sample of state options and promising practices for TANF.

State Option	Implementing?	Interested?
Reduction of Barriers to Participation in Education and Training States can reduce administrative requirements and barriers to access by: • Allowing TANF recipients to count educational activities as standalone (core) activities even beyond the limited period allowed under the federal work participation rate. Most states have enough credit toward the federal rate from caseload declines that they have	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
the flexibility to engage recipients in activities that are not federally countable. By allowing TANF recipients to go to school full time, they will have more time available to study and work toward college completion. • Developing a streamlined verification process for TANF participants to document and report educational activities. This process should not require students to get individual professors to sign attendance reports. • Counting homework time towards participation requirements. • Ensuring that TANF participants receive supportive services (including transportation and child care) for the time they are enrolled in education activities, even when the educational activities are not a core activity. • Ensuring TANF participants are aware that postsecondary education is approved as an activity by assessing TANF employment plan policies and practices, reviewing TANF informational materials, and reviewing the content of policy manuals and caseworker training. In addition, states should more broadly review their TANF policies and practices to remove barriers to participation, such as short time limits or up-front job search requirements. Finally, states can establish partnerships between the human services agency and postsecondary institutions to share data, collaborate on policy reform and alignment, and pursue opportunities to reduce administrative barriers.		
Use of TANF Funds to Support College Affordability Attainment States also have the flexibility to use TANF funds to help students with low incomes afford and complete college, even if they are not receiving TANF cash assistance. Several states have established a need-based financial aid award using TANF funds, which would simultaneously have the effect of qualifying those students for SNAP. For instance, Maine's Leveraging Investments in Families for Tomorrow (LIFT) Act provides grant aid for TANF-eligible student-parents. However, states should avoid using TANF funds to supplant broad state support for financial aid. Students can also be enrolled in a variety of educational programs under TANF, including remedial education, and must be provided supportive services. Arkansas' Career Pathways Initiative provides	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
student-parents with low incomes a range of services including transportation and child care to support their participation in approved career pathways programs.		
Additional State Options For additional CLASP resources that highlight innovative state strategies, opportunities, and federal policy recommendations on education and training within the TANF program please click here.		Want tips/TA

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[15] Arloc Sherman and Tazra Mitchell, *Economic Security Programs Help Low-Income Children Succeed Over Long Term, Many Studies Find*, Center on Budget and Policy Priorities, July 2017, https://www.cbpp.org/research/poverty-and-inequality/economic-security-programs-help-low-income-children-succeed-over.

[16] Ife Floyd, "TANF at 22: TANF Helping Fewer and Fewer Poor Families," Center on Budget and Policy Priorities, August 2018, https://www.cbpp.org/blog/tanf-at-22-tanf-helping-fewer-and-fewer-poor-families.

Notes:

Section 6: Child Care Assistance

Education and training programs can help parents escape low-wage work, but only if they are able to maintain supports like child care as they attend classes and transition into higher-paying jobs. Parents with access to affordable, dependable child care experience fewer disruptions in work or school. When parents can further their education and participate in the workforce, the whole family benefits from the improved financial stability, and children see an increase in social and emotional wellbeing. Equitable state policies for student parents are vital for women of color, who are overrepresented as parents among college students.[17]

In most states, child care is out of reach for many families with low incomes. The nationwide average cost of center-based infant care is more than $9,000, exceeding the annual tuition and fee costs for all community colleges and on par with the tuition and fee costs of many 4-year public colleges.[18,19]

Many programs have been created to address the child care and early education affordability challenge for families with low incomes, such as Head Start, Early Head Start, and federally-funded child care assistance provided by states through vouchers for parents or contracts directly with providers. For example, the U.S. Department of Health and Human Services administers the Child Care and Development Block Grant program (CCDBG, also known as the Child Care and Development Fund or CCDF), which provides child care subsidies to families with low incomes through federal-state partnerships.[20] Due to insufficient funding, CCDBG serves just a small share of eligible children nationally.

CCDBG allows states considerable flexibility in the design of child care programs, including who is eligible for assistance. Though states have discretion to include education and training (including postsecondary education) as a permitted student activity to qualify for assistance, many states restrict eligibility by requiring work in addition to school, imposing time limits, not counting high school completion programs or short-term education and training activities, limiting the postsecondary degree type, or requiring a minimum GPA.[21] Further, states may impose strict authorization rules that make it difficult for parents to manage unpredictable work and school schedules and hinder their pursuit of postsecondary education.

CLASP finds just 8 percent of potentially eligible children nationally received CCDBG subsidies based on federal income eligibility limits and 12 percent of potentially eligible children received subsidies based on state income eligibility limits.

State policy decisions within CCDBG and the broader early childhood system likely contribute to wide variation in subsidy access across states and racial and ethnic groups.

Inequitable Access to Child Care Subsidies, 2019

Clasp.org

January 2020

The U.S. Department of Education administers the Child Care Access Means Parents in School (CCAMPIS) program, which supports the participation of low-income parents in postsecondary education by helping to support or establish campus-based child care services. Funds are used to support or establish campus-based child care programs. The program is very small in comparison to the overall need, with grants to 267 institutions of higher education averaging $160,784 each in FY 2019-2020.

Many states have implemented policies and practices that embrace state flexibility under federal law in the area of child care assistance. The following is a sample of options and promising practices.

State Option	Implementing?	Interested?
Student-Neutral Policies for CCDBG Subsidies States may choose to keep college student CCDBG subsidies as flexible as allowed under federal law. For example, they may choose not to: require work in addition to school; limit the postsecondary degree type; impose time limits; or require a minimum GPA. In recognition of the unpredictability of many student work schedules, states may also decide not to: require documentation of work schedules to authorize care; tie payments too closely to children's attendance; or penalize providers when children are absent due to parents' volatile work schedules. This latter strategy may increase access to child care by incentivizing child care providers to serve children whose parents experience employment instability.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Student-Postivie Policies for CCDBG and Other Child Care Assistance States may wish to increase access to child care assistance by encouraging child care programs to offer child care during nontraditional hours. In addition, states may choose to authorize child care during homework time, allow child care to be authorized for students for at least 48 months, apply deductions from gross income to account for work- or student-related costs in determining eligibility for child care assistance, and weight educational activities toward meeting minimum activity hour requirements for child care assistance.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Access to Child Care on Campus		

State Option	Implementing?	Interested?
Postsecondary institutions can offer publicly funded child care on campus that prioritizes the children of college students instead of those of faculty and staff. Stakeholders may take a role in encouraging postsecondary institutions to prioritize students. Stakeholders can also conduct a scan of campus child care services across the state to analyze where (and why) these programs are successful, where there are gaps, and which colleges are receiving public resources. States could encourage their colleges to apply to participate in the Child Care Access Means Parents in School (CCAMPIS) program, which provides additional resources for child care.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Child Care Assistance and Student Communications States can provide informational materials and web/social media information about child care through postsecondary institutions, human services agencies and education agencies. These materials can provide information about student eligibility for child care assistance and identify a point of contact for additional information. Case managers, navigators, counselors, and other staff can also receive training on how to best help students access child care assistance. States can also clearly describe and standardize student verifications for eligibility for child care across the state. To improve child care assistance policies and practices, human services agencies and higher education institutions can collect data on student satisfaction levels with the availability and quality of child care, application completion, verification challenges, and waitlists.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Additional State Options For additional CLASP resources that highlight state options within the CCDBG program please click **here**.		Want tips/TA

[17] https://www.clasp.org/publications/report/brief/inequitable-access-child-care-subsidies.

[18] "The US and the High Cost of Child Care: A Review of Prices and Proposed Solutions for a Broken System," Child Care Aware of America, n.d., https://www.childcareaware.org/our-issues/research/the-us-and-the-high-price-of-child-care-2019/.

[19] https://research.collegeboard.org/trends/college-pricing/figures-tables/average-published-charges-2018-19-and-2019-20.

[20] https://www.clasp.org/publications/report/brief/ccdbg-helping-working-families-afford-child-care.

[21] Eleanor Eckerson, Lauren Talbourdet, Lindsey Reichlin, et al., *Child Care for Parents in College: A State-by-State Assessment*, Institute for Women's Policy Research, September 2016, https://www.chronicle.com/blogs/ticker/files/2016/09/Child-Care.pdf.

Notes:

Section 7: Free or Low-Cost Health Insurance

Depending on age, income, geographic location, and other factors, college students may be able to access several publicly funded health care options, such as Medicaid, the Children's Health Insurance Program (CHIP), and subsidies for insurance purchased under the Affordable Care Act.

For many students with low incomes, Medicaid coverage is their only path to affordable, comprehensive health care. While young adults may remain on CHIP until age 19 or on their parents' private insurance until age 26, over half of all postsecondary students are over 25. Moreover, parents of young adults under 26 may not have access to affordable private family coverage or be eligible for Medicaid themselves.

Medicaid improves students' financial stability and allows them to succeed in school and at work. According to studies from Ohio and Michigan, adults who accessed care through Medicaid's expansion were more than twice as likely to report improved financial stability and an ability to meet their basic needs.[22] Adults reported that health coverage made it easier to buy food, pay their rent or mortgage, and manage debt.[23]

Many states have implemented policies and practices that expand access to low-cost or free health insurance. The following is a sample of options and promising practices.

State Option	Implementing?	Interested?
Medicaid and College Student Access Most states have adopted and implemented Medicaid expansion, a decision that significantly increases student access to free or low-cost health insurance. In states that have not yet expanded Medicaid, doing so is the single most important thing they can do to increase student access to affordable health insurance.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
The Affordable Care Act and College Student Access Some states have reduced the impact of the benefits cliff – the abrupt reduction or loss of benefits when income is still below self-sufficiency levels – after transitioning from Medicaid to the health care marketplace. They have done so by creating and at times expanding state-funded marketplace subsidies,[24] which requires federal approval. Moreover, states may wish to clarify in multiple settings that moving in order to attend college counts as a qualifying life event for purposes of a special enrollment period under the health care exchange.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Medicaid on Campus Many colleges require students to prove they have health insurance in order to enroll; students without insurance are charged for a student health plan. States should work to ensure that all colleges accept Medicaid as a valid form of insurance for waiving out of mandatory student fees. College health centers can also be encouraged to participate in network with all plans offered under Medicaid and CHIP. Stakeholders can track the number of college health centers that accept Medicaid and encourage more college health centers to participate in Medicaid in the future.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Medicaid and Former Foster Youth States must cover youth aging out of foster care under Medicaid until they turn 26 years of age; at that point, states may wish to provide them with additional support and navigation if they move on to other coverage. In addition, states may choose to automatically enroll former foster youth into Medicaid who move from other states.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Free and Low-Cost Health Insurance and Student Communications States can provide informational materials and web/social media information on free and low-cost health insurance through postsecondary institutions, health centers and education agencies. These materials can provide information about student eligibility and identify a point of contact for additional information. Case managers, navigators, counselors, and other staff can also receive training on how to best help students access free and low-cost health care.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

[22] Suzanne Wikle, "The Evidence Builds: Access to Medicaid Helps People Work," Center for Law and Social Policy, July 2017, https://www.clasp.org/sites/default/files/publications/2017/04/The-Evidence-Builds-Access-to-Medicaid-Helps-People-Work.pdf.

[23] Ibid.

[24] Jennifer Tolbert, Maria Diaz, Cornelia Hall, and Salem Mengistu, "State Actions to Improve the Affordability of Health Insurance in the Individual Market", Kaiser Family Foundation, Jul 17, 2019. https://www.kff.org/health-reform/issue-brief/state-actions-to-improve-the-affordability-of-health-insurance-in-the-individual-market/.

Notes:

Section 8: Housing Assistance

Housing affordability can be a significant challenge for college students. One study found that 36 percent of all college students and 46 percent of community college students were housing insecure. About one-quarter of these students were homeless in the past year. When students are forced to focus on where they will sleep at night because of insecure housing situations, they are distracted from their studies, which can negatively affect academic performance and college completion. Many colleges do not offer student housing, and when housing is available it may not be affordable. According to most recent figures from the National Center for Education Statistics, the cost of a college dorm room has increased more than 60 percent over the past 20 years and costs over $6,000 on average for one school year.

Public housing assistance programs can prevent and ameliorate housing insecurity. Examples of federal housing assistance programs include public housing and Housing and Urban Development (HUD)-assisted and subsidized housing such as Section 8 vouchers. States and local regions may also provide assistance.

Housing assistance is in limited supply nationally; only one-quarter of eligible households in the United States receive federal housing assistance, with about 14 million households in potentially unstable housing situations (Congressional Budget Office 2015). College students and their families are subject to additional rules in order to reside in public or assisted housing. For example, under HUD rules, an entire household is not eligible for occupancy if the household contains a full- or part-time college student under age 24 who doesn't meet exceptions. Housing assistance officials must confirm student status requirements are met to properly determine eligibility for many programs. Some properties have multiple funding sources, and students may need to meet separate student-related rules in order to qualify. Applying student rules can be challenging. Some affordable housing is subsidized through additional mechanisms, such as the Low-Income Housing Tax Credit, which has its own specific rules regarding students.

While public housing assistance options are limited for college students, the following suggests a few options for consideration.

State Option	Implementing?	Interested?
Reduction of Administrative Barriers for Housing Assistance Some young adult students are not subject to the student restrictions, including those who are independent of their parents. States or localities can provide guidance clarifying that former foster youth and individuals placed in housing through programs for runaway and homeless youth are automatically	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
considered independent and are not at risk of losing their housing assistance if they enroll in school. States or localities may wish to use non-federal funds to provide housing assistance targeted at certain high-need students who are not eligible for federal assistance. Local public housing agencies can also facilitate college student access to housing assistance by making portability more seamless between geographic regions and simplifying referral processes.		
Community Resources for Housing Assistance Colleges, particularly those without on-campus housing options, may develop partnerships with others in the community to generate alternatives for their students. Colleges should consider exploring opportunities with local housing communities, developers with multiple apartment buildings or that already have off-campus housing options in the area, hotels/motels, other nearby colleges with underutilized housing (if any), or other relevant community groups. For instance, developers may be able to set aside a small number of apartments for use at a discounted rate for emergency housing. Or, in buildings that cater to students, college representatives may be able to work out a deal for a reduced rate for apartments not leased after the initial move-in "rush" during late August/early September. Multi-college collaborations can support costs or increase bargaining power for deals with private enterprises.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Campus Resources for Homeless Students Colleges may also want to provide supports for students who are homeless or unstably housed. They could keep dorms open during school breaks for students who may not have another place to go or provide secure places for students living in cars to park.	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA
Housing Assistance and Student Communications States can provide student informational materials and web/social media information on housing assistance through postsecondary institutions, health centers and education agencies. These materials can provide information about student eligibility and identify a point of contact for additional information. Case managers, navigators, counselors, and other staff can also receive training on how to best help students access housing assistance. States can also clearly describe and standardize student verifications for eligibility for housing assistance across the state. To improve housing assistance policies and practices, local public housing agencies and	Yes Partially No Do not know	Yes Maybe No Do not know Want tips/TA

State Option	Implementing?	Interested?
higher education institutions can collect data on student satisfaction levels with the availability and quality of housing assistance, application completion, verification challenges, and waitlists.		

Contact Information

If you plan to share your answers with others, please complete this section: **Notes:**

Name:

Title/Dept:

Organization:

City:

State:

Email:

Phone:

Second respondent, if any:

Name:

Title/Dept:

Organization:

City:

State:

Email:

Phone: