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Leveraging Public Benefits to Improve States' Postsecondary Access and Completion

CLASP

Policy solutions that work for low-income people

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July 2019



**EDUCATION
COMMISSION
OF THE STATES**



Overview

Nearly everyone agrees on the benefit of education beyond high school. On nearly every measure of economic wellbeing and career attainment, college graduates outperform their peers who have less education.¹ Each successive level of postsecondary education is correlated with improved social, economic, and health outcomes,² although significant racial disparities persist.³ The benefits of education are extensive and include higher earnings and lower unemployment rates, fewer single-parent births, and greater likelihood a college graduate's children will also go to college. Moreover, workers with a postsecondary education are more likely to get jobs with employer-sponsored health care and retirement savings.⁴

Despite these benefits, many students face significant barriers accessing and completing college.⁵ Today's postsecondary students take many pathways to pursue a postsecondary education. They are increasingly diverse and include students from low-income households, students who are parenting, students who are employed part-time and students who are not coming directly from high school.⁶

Students with low incomes and students of color face ongoing barriers to persistence and completion caused by the high cost of college combined with less support and fewer resources to get in to and succeed in school. Many families are unable to provide financial support for their children, and financial aid does not cover the full cost of attendance, which results in high levels of unmet financial need. Students of color face the added hurdle of entrenched racial barriers that contribute to disproportionately worse outcomes, although these affect their lives long before they reach college.⁷ These factors force students to make difficult tradeoffs between hours worked and attending full or part time, which can negatively impact completion or, in some cases, lead to students dropping out.⁸

Over the past 30 years, college tuition and fees have grown 4 times faster than median income and 4½ times faster than inflation.⁹ Even at community colleges—historically a more affordable option—many students struggle to cover the full costs of going to college, which include living expenses as well as tuition. Studies have shown that the vast majority of community college students—71 percent—lack financial resources to cover the full cost of attendance.¹⁰ For students with low incomes, these gaps often run several thousand dollars per year and are particularly large for students of color with low incomes,¹¹ creating barriers to the postsecondary credentials that are crucial to economic mobility. States should also recognize that this negatively affects their ability to meet the state's college attainment goals.

“College promise” or free college programs are a positive step toward providing an affordable postsecondary option for students with low incomes. But many of these programs focus on community colleges, support students who are recent high school graduates, and cover only tuition and fees, which limit their effectiveness to fully address the affordability challenge. For many students with low incomes, such living expenses as housing, food, and child care are higher than tuition. Further, many types of students, including adults with low incomes, are not eligible for free college programs, which typically place their greatest emphasis on serving traditional-age students transitioning from high school to college.¹²

In this environment, states need to look beyond traditional financial aid sources and free college programs to better support the success of students with low incomes. Access to public, means-tested benefits, such as the Supplemental Nutrition Assistance Program (SNAP) and child care assistance, can help students with low incomes meet financial obligations while in school until they can complete

their credential and find employment that provides a family-supporting wage. When states maximize access to public benefits, students benefit through increased financial stability, decreased debt levels, and ultimately improved chances of earning more and contributing more to the economy.¹³ When postsecondary institutions leverage public benefits, they gain added federal and state financial resources to support persistence and completion.

To support state policy leaders in holistically addressing college affordability, this brief provides an overview of the public benefit programs most relevant to students with low incomes and identifies how states can better align their public benefits and postsecondary education policies to increase the number of students who complete credentials.

Background

College leaders—informed by innovative studies to learn about their student bodies—are keenly aware of the importance of identifying and addressing student financial challenges. For example, California State University commissioned a report on student food and housing insecurity in 2016, which found that 1 in 10 of their 460,000 students were homeless and 1 in 5 lacked adequate access to food.¹⁴ A 2018 survey by the Wisconsin HOPE Lab of 43,000 students at 66 institutions in 20 states and the District of Columbia, found that 36 percent of university students were food insecure in the 30 days preceding the survey—meaning that they lacked the financial resources to ensure consistent access to enough food for a healthy, active life—and 42 percent of community college students were food insecure.¹⁵ The survey also found that 9 percent of university students and 12 percent of community college students were homeless in the last year.¹⁶

A 2018 U.S. Government Accountability Office (GAO) report on college student food insecurity found that 39 percent of all undergraduates—almost 7.3 million—are at risk of food insecurity because of low household income. The GAO estimates that food insecurity among college students ranged from 9 percent to well over 50 percent, with 22 of 31 studies estimating food insecurity rates of over 30 percent. The GAO estimated that more than 2 million college students nationwide experiencing food insecurity are not getting the SNAP food benefits they are likely eligible to receive. This points to an extensive opportunity to connect students to this resource.¹⁷

In November 2016, six federal agencies released a joint letter, “Aligning Federal Supports and Program Delivery for College Access and Completion” describing ways states can integrate benefits to support postsecondary students with low incomes. The letter—a collaboration between the U.S. Departments of Agriculture, Education, Health and Human Services, Housing and Urban Development, Labor, and Treasury—highlighted how income supports and tax credits can promote college completion. “It is critical to ensure current means-tested benefits recipients access education and training opportunities, and to connect eligible students with available federal supports...”¹⁸

Recognizing the prevalence of food and other basic needs insecurity, an increasing number of institutions are looking to integrate access to public benefits into their student supports systems, policies, and practices. Financial aid administrators can screen students for eligibility on programs like SNAP and subsidized health insurance. Colleges can host volunteer income tax assistance services to help students access refundable earned income and education tax credits. And county health and human services agencies can co-locate staff on campuses to better connect students with benefits.

As states consider how to connect more students with low incomes to public benefits and other supports, they must understand how students can use these benefits to cover costs that traditional financial aid does not. Like financial aid programs, public benefits feature their own complex eligibility and implementation rules. State-determined policies may dissuade people with low incomes from attending college or influence whether they attend part- or full-time—a decision that can determine how fast they complete a postsecondary credential and attain family-supporting employment. The key question becomes: how well are public benefits programs aligned to support states' ambitious college completion goals? Just as states are retooling their financial aid programs to support more students with low incomes attending college,¹⁹ they need to consider whether their public benefit policies are also aligned with this goal. States have many opportunities to refine public benefit policies to coordinate with institutional policies, providing more students with low incomes the resources necessary to excel in college.

The key question becomes: how well are public benefits programs aligned to support states' ambitious college completion goals?

Identifying where to align public benefit policies and higher education policies presents a unique opportunity for states. Although this has not historically been an area where they have weighed in, postsecondary leaders and advocates can reframe student unmet need as an economic development issue by explaining to policymakers where public benefit policies are counterproductive to state attainment and workforce goals. Without changes to public benefit policies that improve access to postsecondary credentials, many individuals and families are limited to low-wage, limited growth employment, which undermine state investments in higher education and workforce development.

Overview of Current Public Benefit Policies

States should examine a range of public benefit programs when seeking to align policies to develop a financial aid system that provides more holistic financial supports for students with low incomes.

- **Supplemental Nutrition Assistance Program (SNAP)**, formerly known as Food Stamps, is a means-tested program that supports employment stability and wage growth.²⁰ SNAP offers a modest assurance that people can meet their basic human need for food. Studies have shown that lack of access to food and proper nutrition exacerbates stress, anxiety, and depression;²¹ causes sleep disturbances and fatigue; and impairs cognitive functioning.²² Access to SNAP relieves stress, improves vitality, and allows students to focus their energy on improving their educational and employment outcomes.²³ Everyone who applies for SNAP must meet income, citizenship, and household eligibility requirements.²⁴ While the federal government funds SNAP and sets the benefit levels and eligibility rules, states have many opportunities to

improve access and streamline eligibility that can improve the ability of students to get SNAP. Students enrolled at least half-time, as defined by the institution, may qualify for SNAP if they meet at least one of several criteria (discussed in greater detail below), which include working at least 20 hours a week or caring for children.²⁵ A student enrolled less than half-time would follow the standard SNAP eligibility rules for all applicants and could be subject to SNAP's work requirement.²⁶

- **SNAP E&T (Employment & Training)** is SNAP's work component that states are required to operate. SNAP E&T programs can help SNAP recipients enhance their skills through training, education, or work experience to improve their employability. SNAP E&T has the potential to cover administrative and direct program costs. It also provides supportive services for participants that can include tuition and fees (when not otherwise covered), transportation, dependent care, and books or uniforms.²⁷
- **Temporary Assistance for Needy Families (TANF)** is a federally funded block grant that states use to provide cash assistance and a range of other programs and services for eligible families with children. While they vary by state, cash assistance eligibility rules are typically very stringent. In order to qualify for cash assistance, individuals must have incomes below the level set by the state (generally well below the federal poverty level (FPL)), have dependent children, and demonstrate that they work or participate in work-related activities or qualify for an exemption. States determine whether attending school can count as a work-related activity and for how long students are eligible. In nearly all states, the amount of income provided by cash assistance to recipients fails to reach even half the federal poverty level.²⁸ States may also use TANF funds to provide a range of services to families with low incomes who are not receiving cash assistance. For example, some states use TANF monies to fund work-study positions or scholarships for students. While these programs are not always targeted to the students with the greatest need, they can provide a platform for expanding supports for such students.
- **Child care assistance** helps parents with low incomes cover all or part of the cost of child care so they can work or go school. The primary federal funding stream for child care is the Child Care and Development Block Grant (CCDBG), but states also use funds from the Social Services Block Grant (SSBG) and the TANF block grant. To receive all available federal funds, states contribute funding as well. CCDBG is a capped entitlement, meaning that states receive a set amount of funding, which does not cover all of the families who need or are eligible for child care assistance. Because states set policies in the context of available funding, they must make difficult trade-offs that often limit access to child care assistance for postsecondary students.²⁹
- **Medicaid** is a joint program between the federal government and states that provides health care to individuals and families with low incomes. Eligibility and exact medical benefits vary across states, with some offering more robust health care access than others. In states that have not used the Affordable Care Act's provision to expand Medicaid, income eligibility ranges from zero for adults with no dependent children to a median of 43 percent of the FPL

for parents with dependent children, leaving 2.5 million adults without access to affordable health care.³⁰ Children and pregnant women may be eligible for coverage under the Children's Health Insurance Program (CHIP). Households with incomes above 100 percent of the FPL may be eligible for premium subsidies for insurance through the Affordable Care Act. For students, moving to or from the place they attend school is considered a "qualifying life event" that may allow them to purchase insurance outside of the regular open enrollment season.

Administration of Public Benefits

By understanding who administers programs at the state level, postsecondary leaders can better coordinate and connect students with low incomes to these programs. The administration of financial supports for individuals with low incomes does not rest with one level of government. It varies across federal, state, and local levels, which adds complexity to the interactions among these policies—but that can also provide opportunities for improvement. Programs can crisscross many agencies and departments that target different types of needs (e.g., food or housing). Because each program establishes eligibility rules and target populations, it can be difficult for someone to access all the benefits for which they may be eligible. For example, some programs only screen for income eligibility, while others target or prioritize specific characteristics or specific requirements. Table 1 details how program administration and eligibility are distributed across federal, state, and local agencies or institutions.

Table 1. Distribution of decision making for public benefit programs and tax credits

	Federal level	State level	Local or institutional level
Public Benefits			
SNAP	Majority	Partial	
TANF	Partial	Majority	
Child Care	Partial	Majority	
Medicaid	Partial	Partial	
CHIP	Partial	Majority	
Advance Premium Tax Credit	Full		
Housing Subsidies	Majority		Partial
Unemployment Insurance		Full	
Tax Credits			
AOTC	Full		
EITC	Full		
CTC	Full		

Examples of state discretion:
States approve programs that increase employability; state can average work hours across a month.

States have flexibility in whether postsecondary is an eligible expense

Source: Amy Ellen Duke-Benfield, "Bolstering Nontraditional Student Success: A Comprehensive Student Aid System Using Financial Aid, Public Benefits, and Refundable Tax Credits," Center for Law and Social Policy, 2015 <https://www.clasp.org/publications/report/brief/bolstering-nontraditional-student-success-comprehensive-student-aid-system>.

Finally, the programs also vary by type of funding. Some programs, like SNAP and Medicaid, are entitlements—which expand and contract based upon how many qualifying individuals need support. This allows SNAP to respond to regional or national economic downturns, providing both food assistance and an economic boost to local businesses where participants purchase food.³¹ However, child care and TANF receive funding through capped block grants that are delivered to states based on a federally established funding formula. The funding may be supplemented with state resources, allowing states some discretion with the funding caps. When this funding runs low, however, state policymakers must either find additional state dollars, change eligibility requirements, develop waiting lists, or use other methods to stretch limited resources.

As an example, child care subsidies are delivered to states through a block grant. Most states tailor policies within their discretion, including eligibility levels for families and the amount of subsidy provided to families for care. Many states also establish rules to prioritize families who go to the front of the line for child care supports. Often, those who work are prioritized over parents in school or in training programs. Many states also manage waiting lists for child care once the funding is expended.

College Student Eligibility for Public Benefits Programs

Programs such as TANF and SNAP were created to alleviate the immediate symptoms of poverty and weren't intended to promote postsecondary activities. As such, the programs' rules often conflict with many postsecondary policies and can create attendance and eligibility barriers for students with low incomes. For instance, TANF typically limits students to one year of full-time enrollment in postsecondary education and requires any education beyond that to be combined with at least 20 hours per week of work. However, the financial aid policy in several states provides incentives for full-time college attendance by awarding more aid to students who take a specified number of credits. While such policy attempts to capture the presumed benefit of full-time enrollment as an accelerator of program completion, it conflicts with student eligibility requirements for public benefits. Setting aside other complexities of converting part-time students into full-time students, the threat of ineligibility for state benefits places students with low incomes in a double-bind. While full-time attendance allows students to complete sooner and potentially take on less student debt, it could negatively impact an individual's ability to receive public benefits. Students taking advantage of this financial aid policy may have to forego food assistance or risk taking on an unsustainable combination of work and school, which could harm persistence and completion. Sacrificing access to programs that support basic needs is also problematic because financial aid packages do not reflect the full cost of attendance, and using student loans for expenses not directly related to attendance may be treated as unearned income—though interactions vary based on the specific program.

The interplay among specific programs varies based on state policy choices, but state policymakers must be aware of—and work to mitigate—misaligned incentives in public benefit and state postsecondary policy.

State Policy Opportunities

State leaders should understand how to streamline access to and implementation of public benefits programs that can support postsecondary attendance and completion. Here are highlights of four key policy areas and recommendations/considerations for policy action at the state level.

Supplemental Nutrition Assistance Program (SNAP)

SNAP provides exemptions that allow some students who are enrolled at least half time to meet eligibility requirements defined by the institution. In addition to meeting SNAP's regular income, household, and immigration status requirements, students must meet *at least one* of the additional eligibility criteria. However, states have some flexibility in interpreting these requirements.³² Note: The SNAP exemptions for students summarized here describe what is permissible yet are more nuanced.

1. Age 17 or younger or age 50 or older; or
2. Physically or mentally unable to work; or
3. Approved for a federal or state work-study program; or
4. Working at least 20 hours per week at the federal minimum wage; or
5. Receiving Temporary Assistance for Needy Families (TANF) cash assistance or services; or
6. Responsible for a dependent child under the age of 6; or
7. Responsible for a dependent child between the ages of 6 and 12 for whom you have trouble securing child care; or
8. A single parent enrolled full-time and responsible for a dependent child under age 12; or
9. Enrolled in school through a state or federally approved employment and training program; or
10. Assigned to or participating in one of several types of federal or state employment and training or on-the-job training programs, including those as defined under the Perkins Act.

Policy recommendations:

- States have significant flexibility to designate career-oriented postsecondary programs as employment and training programs, which qualifies them under a student exemption. Massachusetts, Oregon, and Pennsylvania operate promising models where the SNAP agency has determined that all community college programs qualifying under the Perkins Act definition can be counted as "education designed to improve employability."

California allows student exemptions for programs serving first-generation students, former foster care students, families who reached the TANF time limit, and others. This practice expands student eligibility for SNAP benefits significantly without putting SNAP caseworkers in the position of having to make individual assessments of educational programs and serves as a promising practice for replication.

- To meet the 20-hour-a-week student exemption, states have the flexibility to average work hours across a week, month, trimester, or semester. Taking advantage of this option simplifies the paperwork and reporting burden not only for students, but also for instructors, institutions, and human services agencies when verifying student eligibility. This practice improves student access to SNAP by streamlining this requirement and better reflecting the reality that students often have jobs with schedules that may fluctuate based on seasonal changes, economic fluctuations, staff levels, and more. This best practice both expands access and simplifies program administration.
- SNAP recipients can face a penalty for owning a car with a market value over \$4,650 or having more than \$2,250 in savings, which penalizes long-term savings and asset stability. Many states take advantage of the option to raise or eliminate limits on assets and vehicle values to improve access to SNAP.³³ While eliminating asset limits affects more than just students, such rules can harm students who need their vehicle to get to and from school—and may in fact be using their car for shelter if facing housing insecurity or homelessness.³⁴
- In addition to policy changes, states can also educate students about SNAP rules. For example, states can encourage institutions to inform all students who may meet the exemption criteria about their potential eligibility for SNAP.

SNAP Employment and Training (SNAP E&T)

SNAP E&T can be a highly effective way to leverage funding, because states receive 50 percent reimbursement for all non-federal funds they invest. States have significant flexibility over the design of the SNAP E&T program by prioritizing which SNAP participants to serve, which specific services they offer, and who will provide the services. The providers may range from the state itself to community colleges, community-based organizations (CBOs), or workforce development partners. Some states have fully leveraged SNAP E&T to support postsecondary students by using a “third-party reimbursement” model that allows service providers, such as community colleges, to use their non-federal funds to provide supportive services for which they may receive 50 percent reimbursement from the federal government.³⁵

Temporary Assistance for Needy Families (TANF)

The TANF block grant contains certain provisions that have discouraged states from expanding access to education activities for participants. States must ensure that a minimum percentage of adult recipients of cash assistance under TANF meet the federal “work participation rate” (WPR) or face financial penalties.³⁶ However, full-time postsecondary education is only countable toward the WPR for 12 months. This threat of financial penalty has caused states to limit the inclusion of postsecondary education in the WPR out of fear of not meeting the federal requirements. All hours of participation must be monitored and documented, which can be burdensome and stigmatizing. However, states are not required to limit recipients to federally countable activities, and because of the decline in caseload, most states are not at any real risk of penalty for failure to meet the WPR.³⁷

Policy recommendations:

- States should allow TANF recipients to meet their work participation requirements through postsecondary attendance. At a minimum, this should be allowable to the full extent that vocational education (as defined by the state) is countable toward the federal work participation rate.
- States should allow recipients to attend school beyond 12 months, even if not countable toward the federal TANF work participation rate. Nebraska provides a strong example, allowing up to 36 months of standalone education and training.³⁸ In recent years, the state added adult basic education, GED classes, and English as a second language classes as state-countable activities, recognizing that many TANF recipients may not be ready to take college-level classes.
- States can provide need-based financial aid or state work-study jobs funded by state TANF dollars to the students with greatest need, which also allows students receiving these benefits to qualify for SNAP.



Child Care Assistance

Federal parameters allow states considerable flexibility on the design of their child care programs, including who is eligible for assistance. Though education and training—including postsecondary education—may be a permitted activity, many states require work in addition to school, limit the degree type, impose time limits, or require a minimum GPA.³⁹ Strict rules for child care assistance can make it difficult for parents to manage the unpredictable work and school schedules that can hinder their pursuit of postsecondary education. Some states provide better support for postsecondary education by allowing a child care subsidy to cover sufficient time for travel, study hours, and parents' other educational activities.

Policy recommendations

- States should allow postsecondary students to receive child care assistance to cover their studies and not require them to meet additional work requirements. For example, the Minnesota Postsecondary Child Care Grant, provides child care assistance for low-income students attending college. It provides up to \$3,000 for each eligible child and may cover up to 40 hours of child care per week to low-income residents who have a child 12 years or younger and are enrolled for at least 6 credits per term.¹
- States should implement continuous 12-month eligibility for child care assistance to assure parents of uninterrupted access to subsidies, regardless of changing work or school schedules. They should also permit child care authorizations to include study hours, travel time, labs, and other activities related to school attendance.
- States should define education broadly to include certificates and degrees up to and including baccalaureate degrees and avoiding restrictive time limitations on completion of degree requirements.

Oregon is the first state to enact legislation that instructs state agencies and colleges to better align public benefits to support postsecondary attendance for students with low incomes. Passed in 2018, HB 4043 created Oregon's Pathways and Opportunity initiative, which expands the federal, state, and local resources available to students with low incomes. HB 4043 directed the community colleges to join state agencies, the Higher Education Coordinating Commission (HECC), the Office of the Governor, and other stakeholders to study and determine the best methods for community college students to learn about and apply for state or federal programs that offer financial or other benefits, as well as align these benefits to better support students with low incomes. Oregon's Department of Human Services (DHS), Employment Department, Housing and Community Services, and Department of Corrections are all involved in the initiative, as are the state's 17 community colleges, HECC, and anti-poverty advocates. The agencies examined a range of public benefit programs—TANF, subsidized child care, unemployment insurance benefits, housing assistance, the Earned Income Tax Credit, and workforce training benefits available through the Workforce Innovation and Opportunity Act—that could support community college students with low incomes. As a result of HB 4043, colleges created and promoted resource maps and centralized resources and services for students with low incomes; developed and deepened partnerships with local DHS partners, workforce providers, anti-poverty advocates, and community-based organizations; offered professional development to increase the awareness of federal, state, and local resources to support students; and maximized state and federal investments.

Conclusion

As states seek to build more comprehensive student aid systems for students with low incomes, they should also pursue complementary paths. First, they should align policies. State higher education agencies need to build relationships with the agencies that administer public benefits to shape policies that better support postsecondary attendance and ensure more students with low incomes—including those from communities of color—can access benefits. State administrators of health and human services programs may not know how to leverage the state's college completion goals by aligning public benefit policies with higher education policies. In fact, state public benefit agencies and higher education agency goals are often more aligned than initially apparent. Both are designed to provide a path for individuals and families to obtain the necessary support and skills that lead to lasting social and economic mobility. Policy alignment provides potential for synergy as administrators of higher education and public benefit agencies help one another achieve common state goals.

Second, higher education agencies can encourage institutions to connect more students with low incomes to public benefits. They can build relationships at the state level to foster coordination between institutions and their local SNAP and child care administrators. Institutions can help students access benefits by educating them about the programs; helping them understand how to apply; screening them to determine eligibility and assist them in applying, documenting, and understanding any barriers to eligibility; and following up with local benefits agencies to troubleshoot on behalf of individual students. Higher education institutions can conduct range of activities from hosting public benefits agency staff on campus to embedding screening and application activities in existing college processes. Through better policy alignment and connecting more students with low incomes to benefits, states can help overcome the affordability challenge preventing too many students from reaching their ultimate postsecondary and employment goals.

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Endnotes

¹ Paul Taylor, Kim Parker, Rich Morin, et al., *The Rising Cost of Not Going to College*, Pew Research Center, February 2014, <https://www.pewsocialtrends.org/2014/02/11/the-rising-cost-of-not-going-to-college/>.

² Kent Hill, Dennis Hoffman, Tom Rex, *The Value of Higher Education: Individual and Societal Benefits (With Special Consideration for the State of Arizona)*, Arizona State University, October 2005, <https://www.asu.edu/president/p3/Reports/EdValue.pdf>.

³ Janell Ross, "African-Americans With College Degrees Are Twice As Likely to Be Unemployed as Other Graduates," *The Atlantic*, May 2014, <https://www.theatlantic.com/politics/archive/2014/05/african-americans-with-college-degrees-are-twice-as-likely-to-be-unemployed-as-other-graduates/430971/>.

⁴ Teresa Kroeger and Elise Gould, *The Class of 2017*, Economic Policy Institute, May 2017, <https://www.epi.org/publication/the-class-of-2017/>.

⁵ Terris Ross, Grace Kena, Amy Rathbun, et al., *Higher Education: Gaps in Access and Persistence Study*, National Center for Education Statistics, August 2012, <https://files.eric.ed.gov/fulltext/ED534691.pdf>.

⁶ CLASP, *College Students Aren't Who You Think They Are*, 2017, https://www.clasp.org/sites/default/files/publications/2017/08/2017June_CollegeStudentsArentWhoYouThinkTheyAre.pdf.

⁷ Thomas Rudd, *Racial Disproportionality In School Discipline: Implicit Bias Is Heavily Implicated*, The Kirwan Institute for the Study of Race and Ethnicity, February 2014, <http://kirwaninstitute.osu.edu/racial-disproportionality-in-school-discipline-implicit-bias-is-heavily-implicated/>.

⁸ Lauren Walizer, *Barriers to Success: High Unmet Financial Need Continues to Endanger Higher Education Opportunities for With low incomes Students*, Center for Law and Social Policy, June 2015, <https://www.clasp.org/publications/report/brief/barriers-success-high-unmet-financial-need-continues-endanger-higher>.

⁹ "IHEP Testifies Before House Appropriations Committee and Urges Federal Lawmakers to Strengthen and Protect Pell Grants in FY19," Institute for Higher Education Policy, April 2018, <http://www.ihep.org/press/opinions-and-statements/ihep-testifies-house-appropriations-committee-and-urges-federal>.

¹⁰ Lauren Walizer, *When Financial Aid Falls Short: New Data Reveal Students Face Thousands in Unmet Need*, Center for Law and Social Policy, December 2018, <https://www.clasp.org/publications/report/brief/when-financial-aid-falls-short-new-data-reveal-students-face-thousands>.

¹¹ Ibid.

¹² Sarah Pingel, Emily Parker, and Lauren Sisneros, *Free Community College: An Approach to Increase Adult Student Success in Postsecondary Education*, Education Commission of the States, November 2016, <https://www.ecs.org/free-community-college-an-approach-to-increase-adult-student-success-in-postsecondary-education/>.

¹³ Barbara Gault, Jessica Milli, and Lindsey Reichlin Cruse, *Investing in Single Mothers' Higher Education: Costs and Benefits to Individuals, Families, and Society*, Institute for Women's Policy Research, June 2016, https://iwpr.org/wp-content/uploads/2018/06/C469_Single-Mothers-Exec-Summary.pdf.

¹⁴ Rosanna Xia, "1 in 10 Cal State Students Is Homeless, Study Finds," *Los Angeles Times*, June 2016, <http://www.latimes.com/local/lanow/la-me-cal-state-homelessness-20160620-snap-story.html>.

¹⁵ Those individuals with low food security report reduced quality, variety, or desirability of diet and those with very low food security exhibit multiple indications of disrupted eating patterns and reduced food intake, including skipping meals, because the household lacks enough money and other resources for food.

¹⁶ Sara Goldrick-Rab, Jed Richardson, Joel Schneider, et al., *Still Hungry and Homeless in College*, Wisconsin HOPE Lab, April 2018, <https://hope4college.com/wp-content/uploads/2018/09/Wisconsin-HOPE-Lab-Still-Hungry-and-Homeless.pdf>.

¹⁷ Kathryn Larin, *Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits*, United States Government Accountability Office, December 2018, <https://www.gao.gov/products/GAO-19-95>.

¹⁸ "Aligning Federal Supports and Program Delivery for College Access & Completion," U.S. Department of Education, November 2016, <https://www2.ed.gov/documents/press-releases/federal-supports-college-access-completion.pdf>.

¹⁹ Sarah Pingel, Brian Sponsler, and Neal Holly, *Redesigning State Financial Aid: Principles to Guide State Aid Policymaking*, Education Commission of the States, August 2018, <https://www.ecs.org/redesigning-state-financial-aid-principles-to-guide-state-aid-policymaking/>.

²⁰ Nune Phillips, *SNAP and Work*, Center for Law and Social Policy, February 2018, <https://www.clasp.org/publications/fact-sheet/snap-and-work>.

²¹ Adrienne O'Neil, Shae Quirk, Siobhan Housden, et al., "Relationship Between Diet and Mental Health in Children and Adolescents: A Systematic Review," *American Journal of Public Health* 104 (2014), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4167107/>.

²² Michael Green, Peter Rogers, Nicola Elliman, et al., "Impairment of Cognitive Performance Associated with Dieting and High Levels of Dietary Restraint," *Physiology & Behavior* 55 (1994), <http://www.seven-health.com/wp-content/uploads/2018/08/Impairment-of-Cognitive-Performance-Associated-with-Dieting-and-High-Levels-of-Dietary-Restraint-.pdf>.

²³ 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>.

²⁴ "Am I Eligible for SNAP?," U.S. Department of Agriculture, Food and Nutrition Service, September 2013, <https://www.fns.usda.gov/snap/recipient/eligibility>.

²⁵ Carrie Welton, *SNAP and Students: Food Assistance Can Support College Success*, Center for Law and Social Policy, January 2019, https://www.clasp.org/sites/default/files/publications/2019/01/GENERAL%20SNAP%20and%20Students%20Fact%20Sheet_FINAL_0.pdf.

²⁶ Ibid.

²⁷ "What Is Snap E&T?" United States Department of Agriculture SNAP to Skills, n.d., <https://snaptoskills.fns.usda.gov/about-snap-skills/what-is-snap-et>.

²⁸ Elizabeth Lower-Basch, *TANF 101: Cash Assistance*, Center for Law and Social Policy, April 2019, <https://www.clasp.org/publications/report/brief/tanf-101-cash-assistance>.

²⁹ Hannah Matthews, Karen Schulman, Julie Vogtman, Christine Johnson-Staub, and Helen Blank, *Implementing the Child Care and Development Block Grant Reauthorization: A Guide for States*, CLASP and National Women's Law Center, updated June 2017, <https://www.clasp.org/sites/default/files/publications/2017/08/CCDBG-Reauth-Guide-Updated.pdf>.

³⁰ Rachel Garfield, Kendal Orgera, and Anthony Damico, *The Coverage Gap: Uninsured Poor Adults in States that Do Not Expand Medicaid*, Kaiser Family Foundation, March 2019, <https://www.kff.org/medicaid/issue-brief/the-coverage-gap-uninsured-poor-adults-in-states-that-do-not-expand-medicaid/>.

³¹ 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>.

³² 7 CFR § 273.5 – Students, <https://www.law.cornell.edu/cfr/text/7/273.5>.

³³ "The Supplemental Nutrition Assistance Program (SNAP): Categorical Eligibility," Congressional Research Service, January 2019, <https://fas.org/sgp/crs/misc/R42054.pdf>.

³⁴ 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>.

³⁵ Ibid., 26.

³⁶ 42 U.S.C. Section 607(c),(d), <https://www.law.cornell.edu/uscode/text/42/607>; 45 C.F.R. Section 261.31, <https://www.law.cornell.edu/cfr/text/45/261.31>.

³⁷ Elizabeth Lower-Basch, *TANF 101: Work Participation Rate*, Center for Law and Social Policy, April 2019, <https://www.clasp.org/publications/report/brief/tanf-101-work-participation-rate>.

³⁸ Lavanya Mohan, *TANF Education and Training: Nebraska's Employment First*, Center for Law and Social Policy,

February 2014, <http://www.clasp.org/resources-and-publications/publication-1/Nebraskas-Employment-First-Program-1.pdf>.

³⁹ 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>.