

CalFresh College Students Statewide Data Sharing Agreement

Report to the Legislature

STATE OF CALIFORNIA
Gavin Newsom, Governor

CALIFORNIA HEALTH & HUMAN SERVICES
AGENCY
Kim Johnson, Secretary

CALIFORNIA DEPARTMENT OF SOCIAL
SERVICES
Jennifer Troia, Director

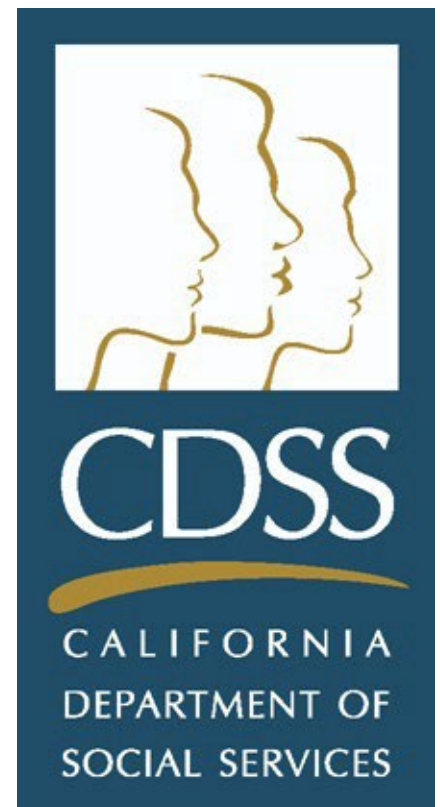


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Legislative Mandate

This report is responsive to the reporting requirements in the Supplemental Report of the 2024-25 Budget Act, Item 5180-001-0001.

On or before February 1, 2025, the Department of Social Services, in consultation with the California Community Colleges, the University of California, the California State University, and the California Student Aid Commission, shall report to the Legislature on efforts to create a statewide data-sharing agreement that increases access to data that would aid efforts to increase eligible California college students' use of the CalFresh program. The report shall provide an update on progress toward creating an agreement that is aligned with federal Supplemental Nutrition Assistance Program disclosure regulations and could help identify new, continuing, and returning college students who are potentially eligible for CalFresh benefits and allow campuses to provide support services to students who have unsuccessfully applied to the program. The report shall include barriers, costs, or other issues related to developing a statewide data-sharing agreement.

Additional copies of this report can be obtained from:

Office of Legislation
California Department of Social Services
744 P Street, MS 9-3-070
Sacramento, CA 95814
(916) 657 2623

Executive Summary

CalFresh can play a crucial role in helping students meet basic needs and achieve academic success. However, the federal Supplemental Nutrition Assistance Program (SNAP) student eligibility rule significantly narrows CalFresh eligibility for students. Despite this rule, the California Department of Social Services (CDSS) and its partners have made progress in improving access to CalFresh and reducing food insecurity. Analysis completed by the [California Policy Lab](#) shows a dramatic improvement of 25 percent in CalFresh take-up among University of California (UC) undergraduates over the course of the last decade, likely as a result of partnerships between CDSS, the California Student Aid Commission (CSAC), counties, and California's public higher education segments, consisting of the California Community Colleges, California State University, and University of California (hereafter "public higher education segments" or "segments"). Yet there continues to be a participation gap among students.

The CDSS, CSAC, and California's public higher education segments, through a collaborative process, identified four data and research needs that could be actionable for the purposes of increasing the use of CalFresh among eligible college students: 1) data that segments can use to conduct outreach; 2) data to track progress of CalFresh outreach efforts, applications, and enrollment outcomes; 3) real-time data for campus CalFresh outreach programs and their staff to follow-up on particular applications or cases; and 4) data to measure the impacts of CalFresh on academic success.

The CDSS, CSAC, and public higher education segments are working towards a statewide data sharing agreement that would facilitate work to address the above data and research needs as they relate to the exchange of individual level data for the purposes of targeted outreach and reporting.

With continued progress, a statewide data sharing agreement to meet these needs is likely to be in place in 2026. This agreement would not require individual campuses or county welfare departments (CWDs) to enter into their own legal agreements. This agreement would also not preclude any ongoing or planned local agreements between individual campuses and counties but could be an option in lieu of a local agreement.

Meeting the above data and research needs will likely require additional resources to match, analyze, and report data in compliance with federal law and in a way that maximizes data security and privacy, in addition to the statewide data sharing agreement.

Introduction

Students in need should be able to easily access benefits they are eligible for, such as CalFresh, to meet their basic needs and support academic success. However, the federal student eligibility rule, which limits CalFresh eligibility to college students who work an average of 20 hours per week unless otherwise exempt, significantly narrows CalFresh eligibility for students. This rule also complicates the administration of CalFresh as county Human Service Agencies (HSAs) spend significant time determining qualifying work hours, as well as exemptions from the rule. Despite this rule, CDSS and its partners have made progress in improving access and reducing food insecurity, but work remains to close the participation gap among eligible students.

Effectively utilized data and research can have a significant impact in helping campus CalFresh outreach programs, individual campuses, public higher education segments, and entities that oversee and administer safety net programs, identify more eligible students to be enrolled in safety net programs such as CalFresh.

Background

Much of the conversation around students' basic needs in California has centered on CalFresh, known federally as SNAP, and how data and research can support in helping CalFresh outreach programs on campuses across the state conduct outreach and application assistance with the goal of increasing CalFresh participation among eligible college students. However, federal law limits the use and disclosure of information provided for the purpose of determining eligibility without consent. Similarly, federal law limits the use and disclosure of certain student information, including information provided by students on the Free Application for Federal Student Aid (FAFSA).

Across all states, this poses a challenge related to the sharing of SNAP enrollment information with public higher education segments that can help students obtain and keep benefits. To overcome this challenge, SNAP agencies, including the State, or county departments implementing SNAP, could share generalized data on participation status or share information on a student's *potential* eligibility (without revealing SNAP data). Such methods require sophisticated data techniques and can be facilitated by SNAP program administrators or an authorized third-party. In California, for CalFresh, these roles could be played by the CDSS' research and data team or [California's Cradle to Career Data System](#) (C2C). The C2C is responsible for establishing and maintaining California's statewide, longitudinal education database, and is already linking data between education, human services, and employment domains.

Data Needs and Data Flow

Through a collaborative process, CDSS, CSAC, and the public higher education segments identified four types of data and research that could be actionable for the purposes of increasing CalFresh participation among eligible college students.

The below section outlines the data needs, the data flow, and any potential costs associated with meeting that data need. All proposed data sharing complies with federal rules related to the use and disclosure of information provided for the purposes of determining SNAP eligibility and must comport with federal rules regarding the use of student data (e.g. the Higher Education Act, Family Educational Rights and Privacy Act).

- 1) **Data that segments can use to conduct outreach.** This would take the form of a flag or indicator of potential eligibility for CalFresh for students at each segment, which their campuses could use to conduct targeted outreach. The public higher education segments and CSAC would need to send student data – including, but not limited to, financial aid information – to CDSS and/or Cradle to Career. The data would be matched periodically (e.g. start of the academic year) to CalFresh enrollment data, and an algorithm would be run to indicate potential

eligibility for CalFresh. A CalFresh eligibility indicator would be returned to each segment, who would in turn share data with each campus via their existing secure data sharing channels. Campuses would use this data for the sole purpose of CalFresh outreach to potentially eligible students. Students would need to consent to share data derived from FAFSA for purposes of outreach.

The ability to generate this indicator would likely require additional resources of approximately 2.0 ongoing, full-time Research Data Specialists at CDSS to facilitate the data collection and match, develop and run an algorithm to determine potential eligibility, and build and maintain automated data pipelines.

- 2) **Aggregate data that the segments and their campuses can use to track outreach progress and CalFresh application and enrollment outcomes.** Segments and their individual campuses want to understand, in aggregate, the performance of outreach efforts to measure progress in increasing enrollment. Aggregate data can provide important information to guide campus CalFresh outreach programs to understand challenges in the application process and to inform strategies to help students overcome those. While CDSS cannot disclose individual application outcomes for CalFresh without explicit consent from students, it can conduct and share ongoing and detailed analyses of aggregate data. This information could take the form of detailed dashboards shared with segments and campuses. Providing this analysis would likely require segments to share individual-level student data with CDSS to accurately identify the campus and/or segment for each student. It would also require adding a data entry field (e.g. required drop down menu) pertaining to campus of attendance within BenefitsCal, the online application tool for CalFresh and other safety net programs.

Providing detailed, aggregate data and analyses via secure dashboards would require approximately 2.0 full time Research Data Specialists, at either CDSS or Cradle to Career. Adding a new data entry field in BenefitsCal would require additional automation work, to modify underlying data in a backend database table or similar data structure, which may also require additional funding.

- 3) **Data that campus CalFresh Outreach programs can use to track and follow-up on each student's application or case.** Some of the most actionable data to increase CalFresh enrollment includes real time information on program status, required next steps, and notices. This granular data can provide campus CalFresh outreach programs with data to help students submit required paperwork, attend interviews, or better understand reasons for denial. Today, CalFresh applicants can opt to consent and authorize disclosure of their

individual case data to community-based organizations and individual campuses via a release of information (ROI). Any CalFresh applicant can sign a paper ROI and allow campus CalFresh Outreach staff to access the individual's case record or specific case-level information. In partnership with counties, CalSAWS, the Department of Health Care Services, and others, CDSS is in the process of incorporating an online ROI as part of BenefitsCal. The release of such data does not require any data sharing agreements outside of the signed ROI.

- 4) **Data to quantify the impact of CalFresh on academic success.** The CDSS and public higher education segments are committed to using their collective data to answer longer-term questions around both the impact of outreach and the eventual impact of enrollment in CalFresh on academic outcomes. Ongoing collaboration with research entities, such as the existing collaboration with the California Policy Lab, will enable such research and contribute to research about the role that safety net supports, including CalFresh, play in academic outcomes. In addition, the C2C Data System will provide opportunities for the public higher education segments, CSAC, and CDSS to use deidentified data to generate such research themselves. The segments and CDSS can also, upon mutual agreement, authorize external researchers to use deidentified data to answer similar questions.

Statewide Data Sharing Agreement

The CDSS, CSAC, and California's public higher education segments are working towards a statewide agreement that would allow for meeting the above data needs. The agreement will amend existing data sharing agreements between the segments and CDSS. The agreement will outline the data elements, data use and disclosure, and data security measures. The agreement will allow for flow of data between state entities (state departments and segments) down to campuses and will not require campuses or counties to enter into their own local data sharing agreements. The state level agreement will promote optimal data security by minimizing the number of entities who have access to sensitive data and ensuring that privacy preserving technology can be used to minimize unauthorized disclosure or access.

Note that any campus or county that has already entered into a local data sharing agreement can continue their agreement if both parties desire once a statewide agreement is signed. In 2025, participating entities will be working on defining data elements and working with legal teams to finalize an agreement to allow for data exchange in 2026, pending necessary resources.

Longer term considerations

As CDSS, CSAC, and the public higher education segments establish a statewide data sharing agreement, several emerging opportunities and existing resources may influence the details of the agreement or the above-described data flows.

- ***CalFresh Confirm and categorical eligibility:*** CalFresh Confirm is an existing tool that can be used to verify receipt of CalFresh or CalWORKs with client consent, as well as to determine categorical eligibility for other programs. Verification via CalFresh Confirm can be facilitated in real time or via batch processing. If entities are interested in using this tool, they must enter an Inter-Agency Agreement with CDSS.
- ***Consent to use data to cross enroll students into safety net programs:*** One promising strategy to increase access to CalFresh is to use data from a student's application to enroll in an institute of higher education to cross-enroll students into CalFresh. This would require obtaining consent from students to use their application and/or financial aid data to facilitate cross-enrollment. CDSS, CSAC, and the public higher education segments are exploring existing touchpoints where each institution interacts with students and could seek their consent to use their data.

Conclusion

Enrollment in CalFresh is critical to addressing food insecurity among college students. Meeting a students' basic needs is a key driver of academic success and completion. Despite federal restrictions on student access to programs such as CalFresh, collaboration between the segments, CSAC, and CDSS has already demonstrated sizeable shifts in the number of eligible students receiving CalFresh. By addressing the research and data opportunities outlined above, CDSS, CSAC, and the public higher education segments will continue towards the shared goals of meeting students' basic needs and maximizing educational attainment.