Reference 1: Rationale for Tool 4

Introduction

The purpose of this document is to provide context and rationale for the data elements that are included and excluded from Tool 4: Explore Available Data. This is an optional addendum to Tool 4; these explanations may help if you have questions about certain data elements, but reviewing it is not essential for building your outreach list(s).

This document includes:

1. List of public benefit programs that Tool 4 helps you assess likely eligibility for;
2. List of **data elements that are <u>included</u>** in the toolkit, which benefit they identify likely eligible students for, and corresponding rationale; and
3. List of **data elements that are <u>excluded</u>** from the toolkit and corresponding rationale

Benefits that Tool 4 helps assess likely eligibility for:

1. Supplemental Nutrition Assistance Program (SNAP)
2. Affordable Connectivity Program (ACP)
3. Child Tax Credit (CTC)
4. Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
5. Medicaid

Why did we select these programs?

This toolkit focuses on *<u>federally-funded</u>* benefit programs so that colleges and universities in any state may use the toolkit to assist students in connecting to benefit programs. Except for the new Affordable Connectivity Program, which launched in 2022, these programs have strong evidence documenting their ability to improve education and health outcomes.

- **SNAP**: There is ample evidence that the student population is under-enrolled (nearly [2 million eligible but unenrolled](#)) in this benefit program and colleges hold data that directly correspond with SNAP eligibility requirements for students.

- **ACP**: Colleges and universities hold data elements that directly correlate with program eligibility, positioning institutions to connect students with the program application and lower their out-of-pocket high-speed internet connection costs.

- **CTC and WIC**: [22% of all undergraduates](#) in the U.S. are parents. Parenting students face significant challenges in funding basic needs, childcare, and education.

- **Medicaid:** This program provides essential and comprehensive insurance coverage to people who meet their state's income threshold, including students. Medicaid coverage reduced the uninsured rate for college students [by half from 2010 to 2018](#). The benefit has the potential to insure and provide essential healthcare for enrolled college students who live in states where Medicaid eligibility has been expanded.[1]

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[1] 38 states are Medicaid expansion states as of toolkit publication, with South Dakota to begin participating in July 2023. States that **do not participate** in Medicaid expansion are: Alabama, Florida, Georgia, Kansas, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Wisconsin, and Wyoming.

Data Elements Rationale

Table 1 includes Free Application for Federal Student Aid (FAFSA), or financial aid data elements included in Tool 4, while Table 2 includes non-financial aid-related data elements that institutions may have that help identify students in need. Table 3 lists excluded data elements and a rationale for each.

Table 1: FAFSA/Financial Aid Data Elements

Data Element	Related Benefits	Rationale
Pell Grant Eligibility	SNAP Medicaid ACP	Pell eligibility is used as a **proxy for income** in this toolkit to identify students who **may be eligible** for **SNAP, Medicaid, and ACP** benefits. Income thresholds and what is counted as income for benefits varies by program and state, but Pell eligibility is a simple data element that institutions can use to identify students who may be eligible for benefits without navigating the complexities of income thresholds. This is differentiated from Pell receipt, since some students who are eligible for Pell Grants may not receive them, pending FAFSA verification or other issues. Students who are not receiving Pell grants but are eligible may still be eligible for public benefit program(s).
Pell Grant Recipient	ACP	All Pell Grant recipients are eligible for the ACP. This is included as a separate data element from Pell eligibility, because colleges and universities may conduct outreach to Pell grant recipients that plainly states that they *are eligible* for the ACP.[2]
Age (under 18 or over 50) (calculated from date of birth, question 9 of FAFSA)	SNAP	These age groups meet a student-specific SNAP eligibility rule.

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[2] As a general practice, colleges and universities should use language that makes it clear students *may* be eligible for a benefit, as the institution itself cannot determine eligibility for a benefit program. However, Pell receipt is a direct eligibility indicator for the ACP, meaning all Pell recipients can enroll in the ACP.

Data Element	Related Benefits	Rationale
Household receipt of certain benefit programs (FAFSA questions 71-75, and 92-96)	SNAP ACP	**SNAP:** Receipt of Temporary Assistance for Needy Families (TANF) benefits is a student-specific SNAP eligibility rule, and receiving any of the benefits listed in this section of the FAFSA (Medicaid, SNAP, Free/Reduced Price Lunch, TANF, WIC) is a good indicator a student may be eligible for additional federal benefit programs. **ACP:** Receiving certain federal benefits (Medicaid, SNAP, Free/Reduced Price Lunch, WIC, FAFSA questions 71-73 and 75, and 92-95 and 96)[3] automatically qualifies a household as eligible for ACP.
Expected Family Contribution[4] (EFC) of 0	SNAP Medicaid ACP	For SNAP, Medicaid, and ACP outreach, it is recommended to use Pell eligibility and/or Pell receipt rather than 0 EFC, to capture a broader group of students who may be eligible for these benefits. 0 EFC is included as a separate data element in this toolkit for two reasons: 1. As of February 2023, students with a 0 EFC are eligible to apply for SNAP. This rule will expire 30 days after the Public Health Emergency (PHE) ends on May 11, 2023. Students who enrolled in SNAP and qualified under a temporary PHE rule can keep SNAP until their next renewal period. Students who qualified under this temporary PHE rule may continue to qualify under a different student-specific SNAP rule. Students who qualified under 0 EFC may believe they are not eligible after the temporary PHE rule expires, so it's important to include this group in outreach as they may continue to qualify. 2. Colleges may wish to use 0 EFC for evaluation purposes since this represents students with the most financial need.

[3] Note: TANF recipients, FAFSA questions 74 and 95, do not automatically qualify for ACP except those receiving tribal TANF. TANF recipients may still qualify based on other ACP eligibility criteria, see: Universal Service Administrative Company, Affordable Connectivity Program, "Do I Qualify."

[4] This section will be updated with the FAFSA move to Student Aid Index (SAI), when more information is available on that change.

Data Element	Related Benefits	Rationale
Work Study Eligible	SNAP	As of February 2023, students who are eligible for work study (even if not participating in the program) are temporarily eligible to apply for SNAP. This rule will expire 30 days after the COVID-19 public health emergency (PHE) ends on May 11, 2023. Students who enrolled in SNAP and qualified under a temporary PHE rule may retain their SNAP benefits until their next renewal period. When the temporary PHE rule expires students who _participate_ in a state or federal financed work study program will continue to be eligible to apply for SNAP.[5]
"Yes" to any FAFSA questions regarding homelessness (questions 52-54)	SNAP Medicaid	Students who experience homelessness are more likely to experience food insecurity and overall basic needs insecurity.
"Yes" to FAFSA question on foster care experiences (question 49)	SNAP Medicaid	**SNAP:** Students who are former foster youth are more likely to experience food insecurity. **Medicaid:** Individuals under the age of 26, who aged out of foster care or are currently in foster care, are eligible for Medicaid.

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[5] For more information on the end of the Public Health Emergency and SNAP temporary student exemptions, see: U.S. Department of Agriculture, Food and Nutrition Services, "Supplemental Nutrition Assistance Program (SNAP) – End of Temporary Student Exemptions in the Consolidated Appropriations Act, 2021," October 12, 2022.

Data Element	Related Benefits	Rationale
Dependents or Children (FAFSA questions 47-48)	SNAP CTC WIC Medicaid	The inclusion of this data element is important to address the basic needs insecurity that most parenting students face, and significant racial disparities among parenting students.[6] **SNAP:** Colleges and universities can use the presence of dependents or children as reported on the FAFSA as a proxy for student-specific SNAP eligibility rules for dependents and childcare. Parenting students, especially single parents, are more likely to experience food insecurity, and the majority of parenting students have children under the age of six, which allows them to apply for SNAP. **CTC:** The CTC provides a large benefit for eligible families with qualifying dependents or children, and many have not claimed the credit. **WIC:** Students can claim WIC benefits if pregnant, postpartum, and/or parenting a child 5 and under. While institutions are unlikely to have data on the ages of students' dependents, dependents reported on the FAFSA can be used as a proxy. **Medicaid**: Students with dependents are more likely to have lower incomes and their children can be screened for both Children's Health Insurance Program (CHIP) and Medicaid eligibility when applying for Medicaid.

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[6] A recent report found that the majority of parenting students face either food or housing insecurity, with significant racial disparities. Asian, Black, and Latinx parenting students experience significantly higher rates of basic needs insecurity than white students. See: Gregory Kienzl, Pei Hu, Ali Caccavella, and Sara Goldrick-Rab, "Parenting While in College: Racial Disparities in Basic Needs Insecurity During the Pandemic," The Hope Center for College, Community, and Justice, February 2022.

Table 2: Institution-Specific Data Points

Data Element	Related Benefits	Rationale
Intake forms or swipes into campus food pantry	SNAP	Visiting a campus food pantry is a likely indicator of food insecurity. Colleges that track this data can include students who visit the pantry on outreach lists for SNAP.
Recipient of meal swipe donations	SNAP	Students that receive meal swipe donations are likely food insecure.
Applied for emergency aid	SNAP	Students who apply for emergency aid may benefit from more consistent and sustainable financial support.
Satisfactory Academic Progress (SAP) Warning or Probation	SNAP	Students facing SAP warning or suspension may be having academic difficulties because of basic needs insecurity (e.g., having to miss class due to no transportation, or needing to work extra shifts, etc.) and may face greater risk of financial hardships if they lose federal financial aid.
Unpaid/late student account	SNAP	Students may have unpaid balances due to an inability to pay and may be facing basic needs insecurity. Colleges and universities will need to decide *when* it is most useful to pull this data element. For instance, if federal financial aid is disbursed after the start of the semester, students could have late balances simply because aid hasn't been applied yet. Colleges and universities should pick a date for pulling data on late accounts that best represents potential need among students with unpaid balances.

Table 3: Excluded Data Elements

Data Element	Rationale
Adjusted Gross Income (AGI)	Federal benefits eligibility requirements vary from program to program and state to state, and whether they apply to an individual or a household. To simplify the process of identifying students who are *likely* eligible for benefits, we use Pell eligibility and EFC data as a proxy for AGI.
Disability	Having a physical or mental disability is a student-specific SNAP rule, and may impact a student's eligibility for Medicaid, but the process for verifying disability can vary from state to state. Additionally, because institutions have incomplete information on which students have disabilities (based on a student's self-disclosure or lack thereof to their college or university) and because it is a sensitive data category to compile, we opted not to include it in the toolkit.
Specific citizenship or immigration status	There are many categories of immigration status that intersect with benefit programs in different ways. A student may be eligible for some benefit programs and not others depending on their specific immigration status and each program's rules. Historically, immigrants have lower rates of participation in benefit programs[7] for which they are eligible than non-immigrants. Including students of any immigration status in your efforts to identify and outreach to students will help your college avoid inadvertently excluding students who may benefit from these programs. For more information, view our Reference sheet on Serving Immigrant Students.

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[7] For more information on historical participation of immigrants in public benefit programs, see: Tanya Broder, Gabrielle Lessard, and Avideh Moussavian, "Overview of Immigrant Eligibility for Federal Programs," National Immigration Law Center, October 2022.