

SNAP Take-up Among Immigrant Families with Children

Curtis Skinner

March 2011



The National Center for Children in Poverty (NCCP) is the nation's leading public policy center dedicated to promoting the economic security, health, and well-being of America's low-income families and children. Using research to inform policy and practice, NCCP seeks to advance family-oriented solutions and the strategic use of public resources at the state and national levels to ensure positive outcomes for the next generation. Founded in 1989 as a division of the Mailman School of Public Health at Columbia University, NCCP is a nonpartisan, public interest research organization.

SNAP TAKE-UP AMONG IMMIGRANT FAMILIES WITH CHILDREN

Curtis Skinner

AUTHOR

Curtis Skinner is director of Family Economic Security at the National Center for Children in Poverty. His current research includes work on poverty measurement, protecting the social safety net under fiscal duress, and the economic security of children in immigrant families.

ACKNOWLEDGEMENTS

This publication was made possible by the generous support of the Annie E. Casey Foundation. The author thanks Michelle Chau and Vanessa Wight for preparing the ACS data file, Vanessa Wight, Yumiko Aratani and Lee Kreader for reading and commenting on the draft, and Morris Ardoin, Amy Palmisano and Telly Valdellon for production support.

SNAP Take-up Among Immigrant Families with Children

Curtis Skinner

March 2011

Introduction

Immigration is rapidly changing the face of young America. More than one child in four aged 18 years old or younger was either born abroad or lived with a foreign-born parent in 2009 and this ratio is expected to rise to one in three by the year 2020.¹ The number of children in immigrant families nearly doubled between 1990 and 2007 compared to growth of only three percent in the number of children living with native-born parents.²

Immigrant families in the United States tend to be stable and hardworking. A higher percentage of immigrant-family children lives in two-parent families and a higher percentage lives with a parent who works full-time, compared to native-family children.³ Children of immigrants are more likely to be born healthier than children of native-born parents and are more likely to live in an extended family that can provide childcare and other household support. At least through middle school, children of immigrants tend to have higher educational aspirations, to spend more time working on homework and to perform better in school than those with native-born parents.⁴

At the same time, immigrant-family children are much more likely to experience economic deprivation than native-family children. In 2009, some 24 percent of children in immigrant families lived below the official poverty line and 51 percent below double the poverty line; the respective figures for children in native families were 18 and 38 percent. Although labor force participation and employment rates are very high among immigrant fathers, many work in low-wage jobs.⁵ Among immigrants, about 29 percent of children lived in a low-income working family in 2009 compared to 17 percent of native-family children. Research shows that the immigrant-family child poverty rate is negatively associated with parental education, English proficiency, length of U.S. residence, and citizenship status.⁶ In 2009, almost one-quarter of all children in immigrant families lived in “linguistically isolated” families in which no household member over age 14 speaks the English language very well. Moreover, 53 percent of immigrant-family children lived with at least one parent who had not graduated from high school, compared to 44 percent of native-family children.

Growing up under economic deprivation is associated with a host of negative outcomes for children in the United States. Children raised in poor families are more likely than other children to lack health insurance; suffer from chronic health problems, such as asthma and vision, hearing and speech problems; have higher incidences of depression, anxiety, and aggressive behavior; underperform on cognitive tests and in the classroom and achieve much lower rates of high school graduation and college attendance; and to remain poor as adults, often starting a new generation of poor families.⁷

For poor and low-income families with children in the United States, the social safety net of income and work supports provided by the federal, state and local governments offers critical assistance in meeting basic needs. But research shows that immigrant families eligible for some important benefits – such as housing assistance and the Supplemental Nutrition Assistance Program (SNAP; formerly known as the food stamp program) – tend to access them at significantly lower rates than do native families.⁸ A wide range of hypotheses have been advanced to explain this relatively lower “take-up rate,” including a lack of knowledge about the programs and their eligibility criteria, burdensome program enrollment and compliance requirements (high “transactions costs”), social stigma and cultural resistance, fear of government among both legal and undocumented immigrants, and fear of jeopardizing the family’s residential status or eligibility for citizenship in the United States.⁹ The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) sharply curtailed legal immigrants’ eligibility for several important benefit programs, including SNAP, and although eligibility standards were subsequently liberalized for certain categories of immigrants, they remain complicated and not easily understood.

This descriptive report identifies traits among low-income, immigrant families that may bear on SNAP participation rates and suggests ways in which state program administrators can improve their outreach and other administrative procedures to better reach these needy families. Drawing on household data from the 2009 American Community Survey and administrative data from the SNAP program, the analysis compares selected demographic and socioeconomic characteristics of immigrant families participating and not participating in the SNAP program with those of native families. The report examines federal and state efforts to improve take-up and concludes with policy recommendations for state program administrators to raise program participation among immigrant families with children.

The SNAP Program

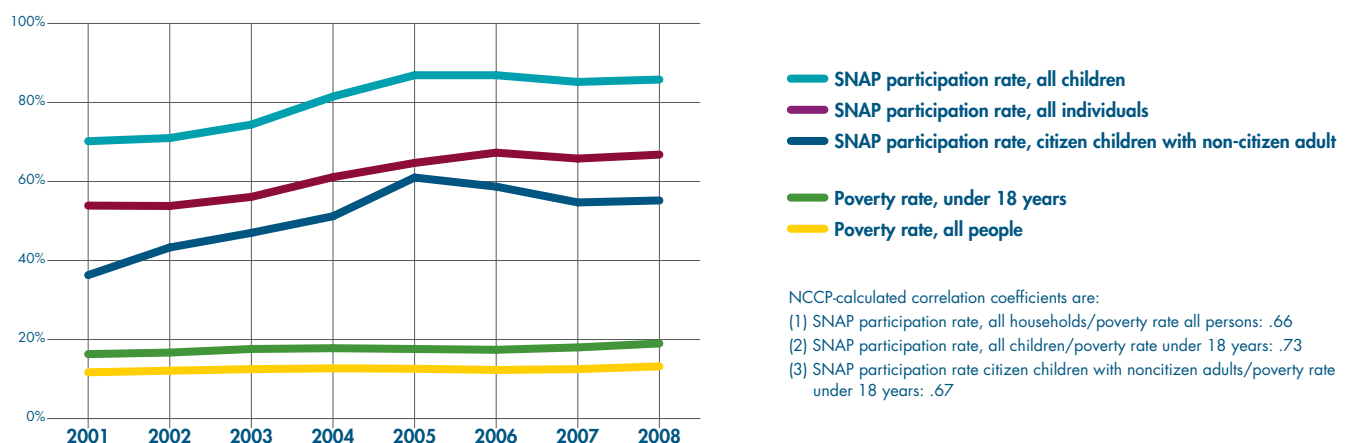
SNAP benefits are an important component of the social safety net in the United States, not least because they are available to most households meeting program income and asset eligibility requirements, unlike other programs that are primarily intended to benefit families of specific composition, such as a single parent with minor children. Under SNAP, beneficiary households receive a monthly award of dollars (recorded on an Electronic Benefit Transfer [EBT] debit card) that can only be used to purchase a broad range of foods. The benefit amount is based on the U.S. Department of Agriculture's (USDA) Thrifty Food Plan and adjusted for the number of qualifying beneficiaries in the household. Program rules are primarily set by the federal government and provide some national consistency not found in other programs, such as Temporary Assistance to Needy Families (TANF), where states have much more input.¹⁰ The federal government pays the full benefit cost and about half of the administrative cost of state SNAP programs.

SNAP national program participation rates correlate closely with national poverty rates. Between fiscal years 2001 and 2008, participation rates (the share of the eligible population that enrolls in the program) rose quite substantially for all individuals (from 54 to 67 percent) and for children (from 70 to 86 percent), according to a USDA-sponsored study (see Figure 1).¹¹ This study attributes the growth in participation to both increased program outreach and an increase in

poverty during this period. Remarkably, the number of persons receiving SNAP benefits has risen by almost one third since fiscal year 2005. Moreover, the SNAP program has proven to be a vital and effective social support in the course of the Great Recession, enrolling more than five million additional persons – a 19 percent increase in caseload – between fiscal years 2008 and 2009. Program participation rose in every state in the nation during that year except Louisiana.¹² More than 40 million persons – about 13 percent of the U.S. population – received SNAP benefits on an average month in fiscal year 2010.¹³

The research literature shows that the SNAP program provides a number of important benefits for low-income families and children. For households that struggle to meet their basic nutritional needs, SNAP benefits can relieve hunger and food insecurity.¹⁵ For those low-income households already meeting their food needs, the program frees scarce dollars spent on food for other purposes. Research shows that SNAP participants gain access to more essential nutrients in their home food supply compared to eligible non-participants.¹⁶ Program participation is especially strong among children, and research shows child SNAP participation is associated with a number of positive outcomes, including better academic learning.¹⁷ For households experiencing food insecurity, participation in the SNAP program improves health and hospitalization outcomes for children.¹⁸

Figure 1. SNAP Participation Rates and Poverty Rates, 2001–2008¹⁴



The Take-up of SNAP Benefits Among Immigrant Families

A substantial research literature explores the “take-up” of SNAP and other social benefits, seeking to explain why some eligible individuals and families fail to enroll in benefit programs. Nationally, only 67 percent of eligible households participated in the SNAP program in fiscal year 2008, and participation rates varied substantially by state and by family demographic and socioeconomic characteristics, such as age, race/ethnicity, income, and participation in other public benefit programs. Children participate at a much higher rate of 86 percent.¹⁹ The comparatively high child participation rate in part reflects the fact that a disproportionate number of eligible children live in very low income (and often single-parent) families that tend to participate in the SNAP program at higher rates than higher-income, eligible households. A disproportionate number of eligible children also live in households receiving TANF or Supplemental Security Income (SSI) cash benefits and are categorically eligible for the SNAP program.

In a review article, Janet Currie identifies three leading hypotheses to explain the selective take-up of social benefits in the United States (and the United Kingdom) among the pool of eligibles: a lack of information about the program and its eligibility criteria, the social stigma associated with receiving means-based public benefits, and the transaction costs of enrolling and remaining in the program.²⁰ Currie concludes from the available evidence that transaction costs – the time, labor and privacy burden associated with completing an application, gathering supporting documentation, submitting to an interview with a caseworker, complying with regular recertification requirements, and so on – are likely to substantially outweigh stigma or lack of program information as a factor reducing the take-up of large and comparatively well-known programs such as SNAP. Currie and Grogger find that shortening SNAP recertification intervals has a negative effect on program participation, supporting the transaction cost hypothesis.²¹ Similarly, Ratcliffe, McKernan and Finegold find that longer recertification periods and other state-level SNAP administrative policies reducing transaction costs increase food stamp receipt.²²

Nevertheless, there is some evidence that lack of information about the program and stigma may also reduce SNAP take-up.²³ A USDA-sponsored, survey-based study found over half of apparently eligible nonparticipant households (who knew about the SNAP program) either believed they were ineligible or were uncertain of their eligibility for SNAP benefits.²⁴ Moreover, almost one third of non-participant households reported they would not apply for SNAP benefits even if they knew they were eligible for them, citing a “desire for personal independence” and the perceived costs of applying. This study also found that “many potentially eligible households are tripped up by administrative requirements” such as verifying income and other household conditions and frequent recertification requirements. Hence, lack of program information, stigma, and transactions costs all seem to play a role in discouraging SNAP program participation, according to this research.

The SNAP benefit take-up story is complicated for immigrants in the United States. The research literature shows that, all else equal, eligible immigrants are less likely to take up means-tested social benefits than natives, but that the immigrant take-up rate rises with length of residence in the United States.²⁵ Bollinger and Hagstrom model SNAP program participation with Current Population Survey March files for the years 1994 through 2001 and find eligible, non-refugee immigrants are less likely to participate than natives, all else equal.²⁶ As observed in the present report and confirmed by the research literature, eligible United States citizen children with immigrant parents also participate in SNAP and other means-tested social programs at much lower rates than children of citizen parents.²⁷

Citizen children in immigrant families have always been eligible for SNAP benefits irrespective of their parents’ legal immigration and citizenship status, provided household income, assets, and other program eligibility criteria are met. However, in 1996, the Personal Responsibility and Work Opportunity Reconciliation Act revoked eligibility for most (legal) noncitizen adult and child immigrants. As would be expected, passage of PRWORA was followed by

a sharp decline in SNAP benefit reciprocity among the foreign born. The number of noncitizens eligible for the program fell by more than half – about 1.7 million individuals – between the years 1994 to 2000, while the number of participating noncitizens declined by 67 percent.²⁸ The strong economy and declining poverty rates of the late 1990s are believed to have contributed substantially to the declines in these numbers by lifting family income and assets above program limits. But sharp declines in program participation rates for low-income noncitizens who remained eligible for SNAP benefits under PRWORA and for eligible, citizen children living with noncitizen adults suggest the law sowed confusion about program eligibility and/or fear about participating.²⁹ A USDA-sponsored study estimated that the program participation rate for these citizen children fell precipitously from 80.5 percent in 1994 to 38.1 percent in 2000, resulting in 949,000 fewer child participants even as the number of eligible citizen children living with non-citizen adults rose slightly during the period.³⁰

Immigrant SNAP eligibility standards were subsequently liberalized significantly by legislation passed in 1998 and 2002. SNAP participation rebounded strongly for both noncitizens and citizen children living with noncitizen adults during the 2001 to 2008 period as

the Farm Security and Rural Investment Act of 2002 restored SNAP eligibility for many legal permanent residents and a slowing economy and rising poverty rates increased program demand.³¹ Under current law, all legal permanent resident (LPR) children and LPR disabled adults are immediately eligible for SNAP benefits. Nondisabled adults are eligible for benefits after having attained LPR or other “qualified” immigration status for five years or – if an LPR – after having worked for 40 quarters, even before attaining LPR status.³²

Although households with citizen children and non-citizen parents participate in SNAP at substantially lower rates than households with citizen parents, as demonstrated below, the program still serves a significant number of these mixed-immigrant families. SNAP administrative data show that eight percent of all program participants and 17 percent of child participants in fiscal year 2009 were citizen children living with noncitizen adults. More than two-thirds of these 2.6 million children lived in six large, immigrant gateway states: Arizona, California, Florida, Illinois, New York, and Texas.³³ The SNAP participation rate for children living with noncitizen adults was estimated at 55 percent in fiscal year 2008 – a substantial share, although far below the 86 percent participation rate for all eligible children.³⁴

Comparing Mixed-Immigrant and Citizen Family SNAP Participation

Why do some mixed-immigrant families (those with at least one citizen child and at least one noncitizen parent) that are income-eligible for SNAP benefits participate in this important program while others do not? While much research has been conducted on factors contributing to the take-up of social benefits generally (as noted above), the literature on immigrant take-up in the United States is comparatively scanty and is sparser still with respect to the SNAP program in particular. This descriptive report identifies traits among low-income, mixed-immigrant families that may bear on SNAP participation rates and suggests ways in which state program administrators can improve their outreach and other administrative procedures to better reach these needy families. Drawing on household data from the 2009 American

Community Survey and administrative data from the SNAP program, the analysis compares selected demographic and socioeconomic characteristics of SNAP participants and non-participants in mixed-families and citizen families, defined as having two U.S. citizen parents (or one citizen parent in the case of single-parent families).³⁵

The data show that a much larger share of mixed-immigrant families is poor compared to citizen families. About 39 percent of the first group receive household income equal to or below the SNAP gross income limit compared to 22 percent of native families.³⁶ Comparing families at or below this income eligibility level shows a number of striking differences between the two groups, as summarized in Table 1.

Table 1. Characteristics of Mixed-Immigrant and Citizen Families Meeting SNAP Gross Household Income Eligibility Standards for FY 2009

	Mixed-Immigrant Families (% unless otherwise indicated)	Citizen Families (% unless otherwise indicated)
Household Characteristics		
SNAP Benefits	44.4	65.5
Mean Household Size	5.2 persons	4.5 persons
Mean Annual Household Income	\$19,509.61	\$16,117.49
Mean Per Capita Annual Household Income	\$3,751.84	\$3,581.66
Parent Characteristics		
Married, Spouse Present	65.2	32.0
Single Mother	30.0	63.2
Worked Full-Time, Full-Year ⁱ	47.0	29.5
Mother's Mean Age	34.3 years	34.1 years
Father's Mean Age	37.1 years	37.3 years
Mother High School Grad or Less	83.8	58.2
Father High School Grad or Less	84.9	65.1
Mother < High School Grad	59.8	23.5
Father < High School Grad	61.9	26.1
Child Characteristics		
Mean Age	6.7 years	7.8 years
Hispanic	84.1	15.5
Black Non-Hispanic	4.7	32.6
Asian Non-Hispanic	4.6	0.3
White Non-Hispanic	5.3	45.5
Other Race/More than One Race	1.3	6.2
Regionⁱⁱ		
South	38.7	45.1
West	40.5	16.2
Northeast	10.3	12.8
Midwest	10.4	25.8
Non-Metropolitan Area	8.4	23.8

i. This is defined as at least one parent usually worked 35 hours or more per week for 50 to 52 weeks during the last 12 months.

ii. Census Bureau Regions are defined as follows: *Northeast*: ME, NH, VT, NY, PA, NJ, MA, CT, RI; *South*: DE, MD, WV, VA, KY, TN, NC, SC, GA, AL, MS, FL, AR, LA, OK, TX; *Midwest*: MI, OH, IN, WI, IL, MN, IA, MO, ND, SD, NE, KS; *West*: MT, WY, CO, NM, ID, UT, AZ, NV, WA, OR, CA, AK, HI.

Source: NCCP tabulations of American Community Survey, Public Use Microdata Sample, 2009.

Child demographics also vary substantially between the two groups of families. Mixed-immigrant children at this household income level are almost a year younger on average than children in citizen families. As expected, given the preponderance of immigrants from Mexico and other Latin American countries among the nation's low-income, foreign-born population, more than four-fifths of children in mixed-immigrant families are reported in the survey as Hispanic compared to 15.5 percent of citizen-family children. Among racial/ethnic categories, citizen-family children are much more likely to be identified as non-Hispanic white or black.

Finally, the regional distribution of mixed-immigrant and citizen families meeting SNAP gross household income eligibility standards is quite different. Low-income, mixed-immigrant families are heavily concentrated in the Census Regions defined as west and south (the last including Texas), reflecting traditional areas of settlement for immigrants from Mexico. While low-income citizen families are even more concentrated in the south than the mixed-immigrant group, they are much less likely to live in the west and much more likely to live in the midwest (defined as 12 north-central states). Equally strikingly, almost one in four citizen families lives outside of a metropolitan area compared to only 8.4 percent of mixed-immigrant families.

These household, parent, child, and regional differences between eligible, low-income, mixed-immigrant and citizen families are largely replicated for SNAP recipients, as shown in Table 2.³⁸ It is evident, though, that SNAP benefits reach comparatively vulnerable and disadvantaged families in both the mixed-immigrant and citizen low-income populations. Comparing Table 2 to Table 1 shows that, for both mixed-immigrant and citizen families, those participating in the SNAP program are poorer, less educated, more likely to be headed by a single mother, and less likely to include a parent who worked full time during the previous full year. Among citizen families, those receiving SNAP benefits include a larger share of black children and a smaller share of non-Hispanic white children.

The mixed-immigrant and citizen family patterns identified in the American Community Survey data and shown in Table 2 are generally verified by an analysis of the SNAP Quality Control Data File (QC) for fiscal year 2008.³⁹ The QC analysis compares households with at least one child and no noncitizens in the SNAP unit to households with at least one child and at least one noncitizen in the SNAP unit. Because the ACS and QC comparison groups are not identical, the consistent findings between the two data sets strengthen confidence in the overall identification of important differences in the characteristics of immigrant-family and citizen-family SNAP participants.

The QC data show that SNAP households including one or more noncitizens are much more likely than all-citizen households to be characterized as “working poor” (defined in the QC data as households with “at least two indicators of earnings,” such as wage and salary income and self-employment income) and much less likely to be headed by a single mother. The working-poor shares for the respective comparison groups were 61 percent and 46 percent, and the single-mother shares 40 percent and 60 percent. At \$761.42, monthly earned income countable under the SNAP program was 62 percent higher for SNAP households including a noncitizen compared to all-citizen households, although the difference is reduced to 39 percent after adjusting for the larger average size of noncitizen SNAP units. Similarly, the average ratio of gross household income to poverty threshold income is higher for noncitizen units than for all-citizen units, at 63 percent and 54 percent, respectively.

The regional and urban/rural distributions of SNAP households in the QC data also largely mirror those observed in the ACS data. All-citizen households with one or more child are concentrated in the south and secondarily in the midwest, while households with one or more child and one or more noncitizen are concentrated in the west and the south. Finally, a higher proportion of households in the last group (94 percent) live in “metropolitan” areas compared to all-citizen households (79 percent), which are comparatively more dispersed in “micropolitan” and rural areas.⁴⁰

Table 2. Characteristics of Gross-Income-Eligible, Mixed-Immigrant and Citizen Families Receiving SNAP Benefits, 2008-2009

	Mixed-Immigrant Families (% unless otherwise indicated)	Citizen Families (% unless otherwise indicated)
Household Characteristics		
Mean Household Size	5.4 persons	4.6 persons
Mean Annual Household Income	\$17,862.48	\$14,756.82
Mean Per Capita Annual Household Income	\$3,307.87	\$3,208.00
Parent Characteristics		
Married, Spouse Present	57.0	25.1
Single Mother	38.4	70.1
Worked Full-Time, Full-Year ⁱ	37.2	21.9
Mother's Mean Age	34.1	32.8
Father's Mean Age	35.4	35.8
Mother High School Grad or Less	85.4	61.6
Father High School Grad or Less	86.8	71.5
Mother < High School Grad	62.4	25.8
Father < High School Grad	64.7	30.4
Child Characteristics		
Mean Age	6.7 years	7.5 years
Hispanic	84.7	15.8
Black Non-Hispanic	4.9	37.3
Asian Non-Hispanic	4.0	0.16
White Non-Hispanic	5.1	39.7
Other Race/More than One Race	1.3	7.0
Regionⁱⁱ		
South	36.7	45.9
West	39.8	14.8
Northeast	11.4	12.7
Midwest	12.1	26.6
Non-Metropolitan Area	8.5	23.8

i. Defined in Table 1.

ii. Defined in Table 1.

Source: NCCP tabulations of American Community Survey, Public Use Microdata Sample, 2009.

Table 3. Characteristics of Gross-Income-Eligible, Mixed-Immigrant Families Participating and Not Participating in the SNAP Program, 2008-2009

	SNAP Participants (% unless otherwise indicated)	SNAP Non-Participants (% unless otherwise indicated)
Household Characteristics		
Mean Household Size	5.4 persons	5.0 persons
Mean Annual Household Income	\$17,862.48	\$20,826.60
Mean Per Capita Annual Household Income	\$3,307.87	\$4,165.32
Linguistic Isolation ⁱ	43.7	45.9
Parent Characteristics		
Married, Spouse Present	57.0	71.2
Single Mother	38.4	23.0
Worked Full-Time, Full-Year ⁱⁱ	37.2	55.0
Mother's Mean Age	34.1 years	34.4 years
Father's Mean Age	35.4 years	37.0 years
Mother High School Grad or Less	85.4	81.3
Father High School Grad or Less	86.8	82.5
Mother < High School Grad	62.4	56.6
Father < High School Grad	64.7	60.1
Mother Not a Citizen	87.3	88.2
Father Not a Citizen	87.2	84.4
Neither Parent Citizen	63.7	65.0
Mother Recent Immigrant ⁱⁱⁱ	28.2	32.1
Father Recent Immigrant	27.0	24.0
Mother Mexican Origin	66.6	65.0
Father Mexican Origin	71.7	67.0
Child Characteristics		
Mean Age	6.7 years	6.7 years
Hispanic	84.7	83.7
Black Non-Hispanic	4.9	4.6
Asian Non-Hispanic	4.0	5.1
White Non-Hispanic	5.1	5.4
Other Race/More than One Race	1.3	1.3
Region^{iv}		
South	36.7	39.4
West	39.8	41.0
Northeast	11.4	9.1
Midwest	12.1	10.5
Non-Metropolitan Area	8.5	8.3

i. Linguistically isolated households are defined as those in which no household member over age 14 speaks the English language very well.

ii. Defined in Table 1.

iii. A "recent immigrant" is defined as one who entered the United States between the years 2000 to 2009.

iv. Defined in Table 1.

Source: NCCP tabulations of American Community Survey, Public Use Microdata Sample, 2009

How do gross-income-eligible, mixed-immigrant families that take up SNAP benefits differ from those that do not? Table 3 compares the two groups by important characteristics.

Consistent with results reported earlier, mixed-immigrant families participating in the SNAP program are poorer (especially per capita), more poorly educated, much more likely to be headed by a single mother, and much less likely to include a parent who worked full-time during the previous full year. Interestingly, the two groups are otherwise quite similar. Most strikingly, the percentages of parents who are recent immigrants (having arrived since the year 2000) and the percentages of households that are linguistically isolated (those in which no household member

over age 14 speaks the English language very well) are approximately similar. Rates of parental non-citizenship, including the share of two-parent families in which both parents are non-citizens, are also quite similar.

These results suggest that the SNAP program is successfully reaching a modest proportion of the neediest and most vulnerable immigrant families. Contrary to what might be expected, recent immigrants and families with two non-citizen parents do not appear to have been especially deterred from taking up SNAP benefits. The question remains why the SNAP take-up rate is so low generally among mixed-immigrant families – especially two-parent, working families – and what can be done to improve it.

Federal and State Efforts to Strengthen SNAP Program Participation

The Supplemental Nutrition Assistance Program is a vital part of the social safety net in the United States. The strong correlations between poverty rates and SNAP program participation rates and the large increase in the number of participants over the course of the Great Recession indicate the program succeeds in reaching many people in need. But it is also clear that large numbers of eligible, immigrant families with children are not receiving this important benefit.

Federal and state SNAP program administrators are well aware of the problem and have made substantial efforts in recent years to increase program participation, both for immigrants and other groups of potential beneficiaries. The Farm Security and Rural Investment Act of 2002 restored SNAP eligibility for many legal permanent residents and also gave state administrators significant new flexibility to simplify program application and reporting requirements and liberalize eligibility standards for participants. President Obama's proposed Fiscal 2011 Budget (still unapproved by Congress as of early 2011) would substantially raise the SNAP asset ceiling for working-age, non-disabled individuals, potentially allowing many more working families to participate in the program. Virtually all SNAP offices servicing communities with significant numbers of non-English

speakers provide program information and application materials in multiple languages and have translation services available.⁴¹

Federal SNAP administrators and some states have also undertaken important outreach efforts to inform potential beneficiaries about the program in recent years. The federal government spent almost \$18 million in matching funds to support state outreach efforts in fiscal year 2009.⁴² Among other measures, the USDA's Food and Nutrition Service (FNS) has launched a targeted outreach initiative to the Hispanic community in the United States (though not specifically to immigrants) that includes a national media campaign to inform Spanish speakers about the SNAP program; a toll-free, Spanish-language telephone number providing program information; a web-based pre-screening tool in Spanish; and educational posters and flyers in Spanish for use in local outreach campaigns. Radio advertising in 2010 included Spanish-language stations serving large immigrant communities in California, Florida, Texas, and Colorado. The SNAP home page on the USDA web site has an Outreach link that includes downloadable informational materials, suggested outreach plans and best practices, and federal and state agency outreach contacts.⁴³

The Food and Nutrition Service has also organized a SNAP Outreach Coalition of FNS representatives, state and local social services agencies, food security advocates and others to share ideas on effective outreach strategies to low-income populations, including Hispanics. In addition, FNS awards Participation Grants to help states partner with non-profits to improve program access and outreach and Outreach Grants to help community-based organizations inform their communities about the program. In fiscal year 2009, FNS funded 14 Outreach Grants in 11 states averaging about \$75,000; nine of these grants targeted Hispanics.⁴⁴ Finally, USDA is partnering with the Mexican government to help inform eligible Mexican nationals living in the United States about nutritional assistance programs. Mexico has agreed to distribute program information through its embassy and consular offices nationwide.⁴⁵

States also support SNAP outreach initiatives with their own funds, although the scope and scale of state efforts vary substantially. In addition to outreach efforts, most states have taken advantage of liberalized federal rules and made substantial efforts in recent years to simplify the process of getting SNAP benefits and staying enrolled in the program. Such reforms can substantially ease the burden of SNAP program participation for families with working parents, who comprise a comparatively large share of low-income, mixed-immigrant families, as shown above. Important reforms include:

- ◆ *Lengthening certification periods.* Certifying household eligibility for SNAP benefits for longer periods lightens the reporting burden for families. The mean certification period for working poor households is 8.5 months. A number of states have opted to extend the certification periods for certain households to 12 months, with an interim report at six months.
- ◆ *Excluding the value of all family vehicles from the SNAP program resource test.* Two-parent, working families frequently require two vehicles to meet their work and family obligations.
- ◆ *Expanding categorical eligibility.* Broad-based categorical eligibility makes more families eligible for SNAP by exempting them from the program resource test and raising the allowable household

gross income limit to up to 200 percent of the federal poverty guideline. Households may qualify for expanded categorical eligibility if they receive or are authorized to receive a non-cash benefit that is funded at least in part by Temporary Assistance to Needy Families or TANF Maintenance of Effort monies.⁴⁶ The benefit may be as basic as receiving an informational brochure or an 800 number to call to locate TANF-funded services. States set different gross income limits (up to a maximum of 200 percent of the federal poverty guideline) for eligibility to receive these TANF/MOE non-cash benefits.

- ◆ *Permitting electronic SNAP application filing.* This option can make SNAP application significantly more convenient for working families with children.
- ◆ *Waiving the face-to-face interview for recertification.* By conducting recertification interviews by telephone, states also lower transaction costs for program participants.

Research confirms that longer certification periods, expanded categorical eligibility, and liberalized vehicle exemption rules can all increase SNAP program participation.⁴⁷ Table 4 shows the status of the eight states that are home to more than three-quarters of the nation's citizen children living with one or more noncitizen parent with respect to these and other reforms. The table also shows the states' estimated SNAP participation rates for all eligible persons, for working poor persons (defined as persons who are eligible for SNAP benefits and live in households in which someone earns income from a job), and for citizen children with at least one noncitizen parent. For comparison purposes, national estimates are also provided.

Table 4 shows a mixed performance among these states in adopting administrative options to ease SNAP program participation among potential eligibles, particularly working families. Apart from California and Washington, mean certification periods for working families are below the national average. Texas does not exclude any vehicles from the SNAP resource test (although the state does exempt a larger amount than the SNAP program's standard auto exemption), which may be a significant disincentive

Table 4. SNAP Administrative Options, Outreach Spending and Program Participation Rates in States with Large Mixed-Immigrant Family Populations⁴⁸

	Arizona	California	Florida	Illinois	New York	North Carolina	Texas	Washington	United States ⁱ
State SNAP Administrative Options									
Certification Period ⁱⁱ	6.0	11.9	6.0	6.9	8.3	6.0	7.3	11.5	8.5
Vehicle Exclusion	All vehicles	All vehicles	All vehicles	All vehicles	1 or more	All vehicles	No	All vehicles	All vehicles
Broad-Based Categorical Eligibility	Yes	Yes; HH w/children	Yes	Yes	Yes	Yes	Yes; asset limit	Yes	Yes
Gross Income Limit for Broad-Based Categorical Eligibility ⁱⁱⁱ	185	130	200	130	130	200	165	200	130
Electronic Application Filing	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	N.A. ^{iv}
Waiver of Face-to-Face Recertification Interview	Yes	Yes; selected regions	Yes	Yes	Yes	Yes	Yes	Yes	Yes
State Outreach Spending (\$ Per Eligible Non-Participant)^v									
FY 2009	0.08	0.55	0.015	1.62	2.46	0	0.45	13.32	1.12
FY 2010	0.31	0.13	0.08	2.27	2.44	0.52	0.60	21.43	1.27
Participation Rates (%)									
All Persons	61	48	57	83	61	63	55	76	66
Working Poor	53	33	48	71	48	57	47	61	56
Citizen Children with 1+ Non-Citizen Parent	49	42	38	44	54	39	47	57	44

i. Mean or mode, depending on the variable.

ii. Mean certification periods for working poor households estimated by NCCP from the Fiscal Year 2008 SNAP Quality Control Data Base.

iii. Expressed as percentage of the federal poverty guidelines. The SNAP gross income limit for those without categorical eligibility is 130% of the federal poverty guidelines.

iv. States are evenly split, with 25 permitting electronic application filing.

v. The number of eligible SNAP non-participants for states is based on 2007 estimates from Cunyningham and Castner, 2009. The outreach spending figures include state monies that are obligated but not yet spent.

for working families in a state where transportation by private vehicle is often essential to reaching jobs. Performance is generally strong with respect to the three remaining indicators. Seven of the eight states have adopted electronic application filing and all have waived the face-to-face recertification interview. Moreover, all eight states have adopted broad-based categorical eligibility, although Texas retains an asset limit of \$5,000 and the states vary considerably in their gross income limits and hence inclusiveness.

State spending on outreach efforts to promote the SNAP program varies greatly among the eight states. In fiscal year 2010, five western and southern states – each

with participation rates below the national average – spent far below the national average (for those states with any outreach spending) on outreach initiatives, calculated on a per-capita basis for eligible non-participants. On the other hand, Illinois, New York and especially Washington spent well above the national average. Moreover, spending shows little year-to-year consistency in most states, suggesting that many outreach initiatives choose a time-limited campaign approach over a sustained presence in targeted communities, which may be more effective. Looking beyond the eight states with the largest numbers of mixed-immigrant families, fully 16 states reported spending no funds on outreach in fiscal year 2009.⁴⁹

Except for Illinois, Washington, and North Carolina, SNAP program participation rates for all eligibles and for the working poor lag behind the national rates, especially in California. Participation rates for citizen children with noncitizen parents, on the other hand, are higher than the national rate in half of the eight states: Arizona, New York, Texas and Washington.

Nevertheless, in six of the eight states, fewer than half of mixed-immigrant families that meet the SNAP gross income eligibility limit receive program benefits. The 42 percent participation rate in California is especially troubling since this state is home to more than one-quarter of the citizen children living in mixed-immigrant families.

Conclusion and Policy Recommendations

The findings in this report suggest that states with significant numbers of immigrant resident families with children might strengthen SNAP participation among these families by adopting the following policies:

Significantly increase outreach efforts to immigrant communities.

In general, state-funded outreach efforts—where they exist at all—are modest, given the 1.8 million potentially eligible citizen children in mixed-immigrant families who are not participating in the program.⁵⁰ Moreover, data are not available from the SNAP national outreach office to determine the share of this outreach spending that is specifically targeted to immigrant communities.

Given the considerable fear and distrust of government among many immigrants (especially the undocumented), effective outreach must be carefully designed to identify families in need and win their confidence. Experienced social service providers report that even immigrants who know about the SNAP program often harbor many misconceptions about it.⁵¹ Some think of SNAP as “welfare,” rather than a work support, and some believe benefits must be paid back at a later time. Parents often do not know that their children may qualify for benefits even if they themselves do not. The undocumented fear a visit to the SNAP office may reveal their status and launch deportation proceedings. Some legal immigrants erroneously believe that participating in SNAP creates a “public charge” under immigration law and jeopardizes their chance of obtaining permanent residence in the United States. The rapid increase in legislation restricting immigrants’ rights in many states and localities in recent years is likely to

make it more difficult to reach low-income immigrants and win their trust.⁵²

While mass media campaigns may raise program awareness, experience with outreach initiatives suggests that overcoming distrust and actually getting immigrant families to apply for benefits often requires a direct personal approach from a credible outreach worker and follow-up contact.⁴⁵ To be sure, this approach is labor-intensive and expensive if using paid staff. Some successful local outreach initiatives have featured the following practices:

- ◆ Training peer educator/advocates. Often called *promotoras(es)* when engaged in outreach to Hispanic communities, these community members can help identify neighborhoods and populations in need and then win trust and communicate program information very effectively.
- ◆ Enlisting trusted community institutions and leaders, such as churches, mutual aid societies, community centers, pastors, teachers and social advocates in the outreach endeavor. Outreach activities with these partners may be organized at their own institutions and at other locations such as fairs, food pantries, Head Start centers, supermarkets, low-income housing projects, and businesses serving immigrants.
- ◆ Promoting SNAP as a benefit for working families. This can help assuage eligible families disinclined to participate in “welfare” programs. It is instructive that immigrant take-up of the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) is substantially higher than that of SNAP. The fact that families apply for WIC at health clinics may encourage the perception that the program is a health benefit rather than “welfare.”⁵⁴

Improve program access for working parents.

By design, the SNAP program is an effective work support, providing benefits that diminish by only 24 to 36 cents for each additional dollar of earnings.⁵⁵ As this report shows, a high percentage of the income-eligible, mixed-immigrant families that do not participate in the SNAP program is headed by working parents who are likely to find it difficult to visit SNAP offices during normal business hours. Many poorly-educated and low-income recent immigrants work jobs that do not provide for any paid leave, meaning that when they miss work they miss pay.

Judging from the research on SNAP administrative measures that have been shown to encourage program participation, states should adopt the following procedures:

- ◆ Keep SNAP offices open on at least some weekday evenings and for some hours on Saturday;
- ◆ Extend certification periods for most working families to 12 months;
- ◆ Permit electronic application filing;
- ◆ Exclude all vehicles from the program resource test;
- ◆ Adopt broad-based categorical eligibility with a gross income limit of 200% of the federal poverty guideline; and
- ◆ Waive the face-to-face recertification interview.

Ensure that SNAP offices are adequately staffed with bilingual caseworkers and provide linguistically and culturally appropriate program informational resources and application materials.

Nearly half of mixed-immigrant non-participating households are linguistically isolated, in that no household member above age 14 speaks the English language very well. All else equal, linguistic isolation may be expected to reduce SNAP program participation by making it more difficult (raising the transaction cost) for parents to obtain information about the program and pursue applying for benefits. It is critical that SNAP offices serving immigrant communities be adequately staffed with caseworkers who speak the native language of these communities and have

the cultural knowledge to build trust through their interactions with the client. Using translators to assist the caseworker is a second-best option, but certainly indispensable should jurisdictions have difficulty hiring sufficient numbers of caseworkers with the desired linguistic and cultural skills.

SNAP offices should also ensure that their program informational resources and application materials are readily comprehensible to potential immigrant participants. Documents prepared in immigrants' native languages should also be as clear and straightforward as possible, considering the low levels of formal education among many mixed-immigrant family parents.

Provide clear and consistent guidance to caseworkers and other SNAP office staff regarding federal and state program policy with respect to immigrant applicants.

Parents who are undocumented may be expected to be cautious about possibly drawing attention to their status by participating in the SNAP program. Even program-eligible, legal permanent residents may believe that government benefit program participation undermines their prospects of attaining U.S. citizenship.⁵⁶ Some of the fears immigrants harbor about participating in the program noted above—such as having their immigration status reported to U.S. Immigration and Customs Enforcement (ICE) and creating a public charge that jeopardizes permanent residence and could lead to deportation – have a basis in experience with other means-tested programs and the law.⁵⁷ To gain the trust of immigrant parents and ensure that SNAP benefits reach their eligible children, state program administrators must rigorously ensure that caseworkers give applicants consistent and accurate information on these matters of grave importance to immigrants. Specifically, immigrant applicants need to know early in the application process that:

- ◆ Household members whose immigration status is undocumented are not eligible to participate in the program but other household members (such as their citizen children) may still be eligible. Undocumented household members are not

required to disclose their status. Those declining to reveal their status are treated as “non-applicants” and are ineligible for SNAP benefits, although their income and resources are still counted in assessing program eligibility for other household members. Benefits cannot be denied to eligible household members because other members decline to disclose their immigration status.⁵⁸

- ◆ Applicants who do disclose their undocumented status will not be reported to the immigration authorities. Although the law requires that the state agency report persons “known” to be present illegally in the United States, the FNS interprets such knowledge as that resulting from a formal agency administrative review supported by an ICE status determination, such as a deportation order. An applicant who merely affirms that s/he doesn’t have “papers” is not known to be present illegally in the country under these guidelines.⁵⁹
- ◆ Receiving SNAP benefits will not create a “public charge” and affect participants’ immigration status.⁶⁰ Only cash benefit programs (such as TANF and Supplemental Security Income) and public programs supporting persons institutionalized for long term care may incur a public charge finding under immigration law.⁶¹

Several of the state administrative reforms recommended in this report may save states money by reducing administrative costs per beneficiary in the near or medium-term. Such initiatives might include extending certification periods, permitting electronic application filing, and waiving the face-to-face recertification interview. Excluding vehicles from the resource test and adopting broad-based categorical eligibility may raise costs only to the extent that they succeed in the policy goal of encouraging greater program participation. Indeed, the FNS expects expanded categorical eligibility to both increase participation and reduce state SNAP program administrative burdens by simplifying verification requirements.⁶² One potentially very important initiative – ensuring immigrant applicants receive accurate information from SNAP office personnel about program policy toward immigrants – is likely to cost relatively little.

But three additional measures – keeping SNAP offices open beyond standard business hours, adding bilingual and culturally competent caseworkers, and increasing effective outreach efforts to immigrant communities – may require significant state resources, even with the federal government defraying half of SNAP program administrative costs. States and localities are under great fiscal strain in the aftermath of the Great Recession and confront many competing demands for social safety net funding. The evidence in this report makes a strong case that a comparatively modest state investment to help raise SNAP program participation among eligible immigrant families can substantially ease material hardship and help ensure productive and healthy futures for working parents and their children.

1. NCCP estimates from the 2009 American Community Survey Public Use Microdata Sample. Unless otherwise referenced, statistics cited in this report are estimated by NCCP from this data source; household and person-level survey weights are used, as appropriate. The ACS does not distinguish between immigrants who are legally present in the United States and those who are undocumented, so both groups are included in the analysis.
2. Mather, M. 2009. *Children in Immigrant Families Chart New Path*. Washington, DC: Population Reference Bureau.
3. Wight, V.; Chau M.; Thampi, K. 2011. *Basic Facts about Poor Children in Immigrant Families*. New York, NY: National Center for Children in Poverty.
4. Shields, M. K.; Berman, R. E. 2004. Children of Immigrant Families: Analysis and Recommendations. *The Future of Children* 14(2): 4-15.
5. United States Department of Labor, Bureau of Labor Statistics. 2010. *Foreign-born Workers: Labor Force Characteristics – 2009*. Accessed Jan. 7, 2011 at <http://www.bls.gov/news.release/pdf/forbrn.pdf>. Labor force participation rates are somewhat lower for foreign-born mothers compared to native-born mothers, especially for those with children under the age of three years.
6. Mather, M. 2009. *Children in Immigrant Families Chart New Path*. Washington, DC: Population Reference Bureau.
7. Currie, J.; Lin, W. 2007. Chipping Away at Health: More on the Relationship Between Income and Child Health. *Health Affairs* 26(2): 331-344.
- Haveman, R.; Wilson, K. 2007. Economic Inequality in College Access, Matriculation and Graduation. In S. Dickert-Conlin; R. Rubenstein (eds.), *Higher Education and Inequality*. New York: Russell Sage.
- Duncan, G. J.; Kalil, A.; Ziol-Guest, K. 2008. *The Economic Costs of Early Childhood Poverty*. Washington, DC: Partnership for America's Economic Success.
- Magnuson, K.; Voturba-Drazal, E. 2009. Enduring Influences of Child Poverty. *Focus* 26(2): 32-37.
8. Capps, R.; Fix, M.; Ost, J.; Reardon-Anderson, J.; Passel, J. S. 2004. *The Health and Well-being of Young Children of Immigrants*. Washington, DC: Urban Institute.
9. Lessard, G.; Ku, L. 2004. Gaps in the Coverage for Children in Immigrant Families. *The Future of Children* 13(1): 101-115.
- Fix, M.; Passel, J. 1999. *Trends in Non-citizens' and Citizens' Use of Public Benefits Following Welfare Reform: 1994-1997*. Washington, DC: Urban Institute.
- Kaushal, N.; Kaestner, R. 2005. Welfare Reform and Health Insurance of Immigrants. *Health Services Research* 40(3): 697-722.
10. Currie, J. 2003. U.S. Food and Nutrition Programs. In R. A. Moffitt (ed.), *Means-tested Transfer Programs in the United States*. Chicago: University of Chicago Press.
11. Leftin, J. 2010. *Trends in Supplemental Nutrition Assistance Program Participation Rates: 2001-2008*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
12. United States Department of Agriculture, Food and Nutrition Service. 2010a. Supplemental Nutrition Assistance Program: Annual and State-Level Data: Persons Participating. Accessed Jan. 5, 2011 at <http://www.fns.usda.gov/pd/snapmain.htm>.
13. United States Department of Agriculture, Food and Nutrition Service. 2010b. Supplemental Nutrition Assistance Program: Average Monthly Participation (Persons). Accessed Jan. 5, 2011 at <http://www.fns.usda.gov/pd/15SNAPPpartPP.htm>.
14. Leftin, J. 2010. *Trends in Supplemental Nutrition Assistance Program Participation Rates: 2001-2008*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
- United States Census Bureau. 2010. *Income, Poverty, and Health Insurance Coverage in the United States: 2009*. Washington, DC.
15. Wight, V.; Thampi, K.; Briggs, J. 2010. *Who Are America's Poor Children? Examining Food Insecurity among Children in the United States*. New York, NY: National Center for Children in Poverty.
- Gundersen, C.; Oliveira, V. 2001. The Food Stamp Program and Food Insufficiency. *American Journal of Agricultural Economics* 83(4): 875-887.
16. Devaney, B.; Haines, P.; Moffitt, R. 1989. *Assessing the Dietary Effects of the Food Stamp Program*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
17. Frongillo, E.A.; Jyoti, D.E.; Jones, S.J. 2006. Food Stamp Program Participation is Associated with Better Academic Learning among School Children. *Journal of Nutrition* 136(4): 1077-1080.
18. Cook, J. T.; Frank, D.A.; Levenson, S.M.; Neault, N.B. 2006. Child Food Insecurity Increases Risks Posed by Household Food Insecurity to Young Children's Health. *Journal of Nutrition* 136(4): 1073- 1076.
19. Leftin, J. 2010. *Trends in Supplemental Nutrition Assistance Program Participation Rates: 2001-2008*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
20. Currie, J. 2004. The Take-Up of Social Benefits. Revision of paper presented at a conference in honor of Eugene Smolensky, Berkeley, CA, Dec. 2003.
21. Currie, J.; Grogger, J. 2001. Explaining Recent Declines in Food Stamp Program Participation. *Brookings-Wharton Papers on Urban Affairs*, pp. 203-244.
22. Ratcliffe, C.; McKernan, S.-M.; Finegold, K. 2007. *The Effect of State Food Stamp and TANF Policies on Food Stamp Program Participation*. Washington, DC: Urban Institute.
23. Ratcliffe, C.; McKernan, S.-M.; Finegold, K. 2007. *The Effect of State Food Stamp and TANF Policies on Food Stamp Program Participation*. Washington, DC: Urban Institute.
- Currie, J. 2003. U.S. Food and Nutrition Programs. In R. A. Moffitt, ed., *Means-Tested Transfer Programs in the United States*. Chicago: University of Chicago Press.
- Haider, S. J.; Jacknowitz, A.; Schoeni, R. F. 2002. Food Stamps and the Elderly: Why Is Participation so Low? Michigan State University, Department of Economics, mimeo.
24. Bartlett, S.; Burstein, N.; Hamilton, W. 2004. *Food Stamp Access Study Final Report*. Alexandria, VA: U.S. Department of Agriculture, Economic Research Service.
25. Currie, J. 2004. The Take-Up of Social Benefits. Revision of paper presented at a conference in honor of Eugene Smolensky, Berkeley, CA, Dec. 2003.
26. Bollinger, C. R.; Hagstrom, P. 2008. Food Stamp Program Participation of Refugees and Immigrants. *Southern Economic Journal* 74(3): 665-692.

27. Leftin, J. 2010. *Trends in Supplemental Nutrition Assistance Program Participation Rates: 2001-2008*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
28. Cunyningham, K. 2002. *Trends in Food Stamp Participation Rates: 1994 to 2000*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
29. In addition, research indicates that numerous families that lost TANF benefits as a result of PRWORA assumed they had also become ineligible for SNAP benefits and failed to apply separately for SNAP. The Government Accountability Office found many state and local governments failed to inform these families of their likely continued SNAP eligibility and to guide them in the application process. Government Accountability Office. 1999. *Food Stamp Program: Various Factors Have Led to Declining Participation*. Washington, DC. GAO/RCED-99-185.
30. Cunyningham, K. 2002. *Trends in Food Stamp Participation Rates: 1994 to 2000*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. It should be noted that these participation rates are calculated using the Current Population Survey to estimate the size of the eligible population, and are subject to a large margin of error. In particular, the 80.5 percent rate estimated for 1994 appears to be anomalously high. But a sharp downward trend is also evident from the 59.8 percent rate estimated for 1995.
31. Leftin, J. 2010. *Trends in Supplemental Nutrition Assistance Program Participation Rates: 2001-2008*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
32. United States Department of Agriculture, Food and Nutrition Service. 2010c. Supplemental Nutrition Assistance Program: Food Stamp Policy on Immigrants. Accessed Dec. 17, 2010 at <http://www.fns.usda.gov/snap/rules/Memo/PRWORA/StatePrograms.htm>. "Qualified" immigrants are defined as: lawful permanent residents; refugees; persons granted asylum; persons granted withholding of deportation or withholding of removal; and Cuban or Haitian entrants.
- Some states chose to continue to fund SNAP benefits for certain classes of immigrants excluded under PRWORA with their own state monies. California, Nebraska, Wisconsin, Connecticut, Maine, Minnesota and Washington have all run programs since the late 1990s to provide food assistance to certain categories of otherwise-eligible, legal immigrants made ineligible for federal SNAP benefits as a result of PRWORA. Except for California's program, which served more than 25,000 persons monthly in early 2009, these programs are modest in scale, according to information provided by the states to the U.S. Department of Agriculture. (See United States Department of Agriculture, Food and Nutrition Service 2010c and U.S. Department of Agriculture, Food and Nutrition Service, 2010d. Supplemental Nutrition Assistance Program: Reaching Low-Income Hispanics with Nutrition Assistance. Accessed Dec. 20, 2010 at <http://www.fns.usda.gov/cga/FactSheets/reaching.pdf>.)
33. Leftin, J.; Gothro, A.; Eslami, E. 2010. *Characteristics of Supplemental Nutrition Assistance Program Households, Fiscal Year 2009*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. The noncitizen adults indentified in this data source may or may not be parents and may or may not be SNAP program participants.
34. Leftin, J. 2010. *Trends in Supplemental Nutrition Assistance Program Participation Rates: 2001-2008*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
35. These estimates are calculated from an NCCP-prepared ACS PUMS file in which the individual child is the unit of observation.

Hence, statistics (means and proportions) estimated for household and parent variables are weighted by the number of observed children in each category (citizen children with at least one non-citizen parent and citizen children with two citizen parents). For expository purposes, the terms "mixed-immigrant family" and "citizen family" are substituted for the more accurate but more cumbersome child-defined categories.

36. The SNAP gross monthly income limits for fiscal year 2009 ranged from \$1,127 for a household of one to \$3,857 for a household of eight, with \$390 added for each additional household member. The limits are higher for Alaska and Hawaii. United States Department of Agriculture, Food and Nutrition Service. 2010e. Supplemental Nutrition Assistance Program: Eligibility. Accessed July 2010 at http://www.fns.usda.gov/snap/applicant_recipients/eligibility.htm.
37. Calculating SNAP participation rates on the basis of gross income eligibility may result in underestimates because some households that meet the program gross income limit may not meet the net income or resource requirements. On the other hand, Ratcliffe, McKernan and Finegold (2007) use a larger denominator of 175 percent of the federal poverty threshold, arguing that households with income modestly above the gross income limit can readily modify their behavior to become eligible for the program and hence should be included in the pool of "eligibles."
38. It should be noted that Table 2 compares the sub-set of SNAP recipients meeting program gross income eligibility standards. Households with incomes exceeding the standards may still qualify for SNAP benefits if they meet requirements for "categorical eligibility" by receiving a cash or non-cash benefit funded in part by federal or state Temporary Assistance to Needy Families or Maintenance of Effort funds. All of the patterns shown in Table 2 are replicated for the full set of SNAP recipients.
39. NCCP tabulations of the SNAP Quality Control Data File, Fiscal Year 2008. The file contains more than 50,000 observations of SNAP household units and includes person-level variables.
40. A metropolitan area is defined as containing "at least one urbanized area of 50,000 or more population with an adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties." A micropolitan area is similarly defined for an "urban cluster of at least 10,000 but less than 50,000 population." A rural area is neither metropolitan nor micropolitan. Wolkwitz, K.; Ewell, D. 2009. *Technical Documentation for the Fiscal Year 2008 SNAP QC Database and QC Minimodel*. Washington, DC: Mathematica Policy Research, Inc.
41. Bartlett, S.; Burstein, N.; Hamilton, W. 2004. *Food Stamp Access Study Final Report*. Alexandria, VA: U.S. Department of Agriculture, Economic Research Service.
42. United States Department of Agriculture, Food and Nutrition Service. 2010f. Supplemental Nutrition Assistance Program. National Data Bank Public Use data provided to NCCP by SNAP National Outreach Coordinator, Jan. 3, 2011.
43. United States Department of Agriculture, Food and Nutrition Service. 2010d. Supplemental Nutrition Assistance Program: Reaching Low-Income Hispanics with Nutrition Assistance. Accessed Dec. 20, 2010 at <http://www.fns.usda.gov/cga/FactSheets/reaching.pdf>.
44. United States Department of Agriculture, Food and Nutrition Service. 2010e. Supplemental Nutrition Assistance Program: Eligibility. Accessed July 24, 2010 at http://www.fns.usda.gov/snap/applicant_recipients/eligibility.htm.

45. United States Department of Agriculture, Food and Nutrition Service. 2010d. Supplemental Nutrition Assistance Program: Reaching Low-Income Hispanics with Nutrition Assistance. Accessed Dec. 20, 2010 at <http://www.fns.usda.gov/cga/FactSheets/reaching.pdf>.
46. The TANF program provides cash payments and other forms of assistance to low-income families with children. TANF Maintenance of Effort requires states to spend a minimum amount of state monies for benefits and services to needy families every year; these funds may be spent outside of the TANF program.
47. Currie, J.; Grogger, J. 2001. Explaining Recent Declines in Food Stamp Program Participation. *Brookings-Wharton Papers on Urban Affairs*, pp. 203-244.
- Bartlett, S.; Burstein, N.; Hamilton, W. 2004. *Food Stamp Access Study Final Report*. Alexandria, VA: U.S. Department of Agriculture, Economic Research Service.
- Ratcliffe, C.; McKernan, S.-M.; Finegold, K. 2007. *The Effect of State Food Stamp and TANF Policies on Food Stamp Program Participation*. Washington, DC: Urban Institute.
48. United States Department of Agriculture, Food and Nutrition Service. 2010g. Supplemental Nutrition Assistance Program: Soft Eligibility Requirements States. Accessed Jan. 5, 2011 at <http://www.fns.usda.gov/pd/snapmain.htm>.
- United States Department of Agriculture, Food and Nutrition Service. 2009h. *Supplemental Nutrition Assistance State Options Report*, Eighth Edition. Alexandria, VA.
- Cunyngham, K. E.; Castner, L.A. 2009. *Reaching Those in Need: State Supplemental Nutrition Assistance Program Participation Rates in 2007*. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.
- NCCP estimates from American Community Survey 2009 Public Use Microdata Sample (participation rates for citizen children with at least one non-citizen parent).
- United States Department of Agriculture, Food and Nutrition Service. 2010f. Supplemental Nutrition Assistance Program. National Data Bank Public Use data provided to NCCP by SNAP National Outreach Coordinator, Jan. 3, 2011.
49. United States Department of Agriculture, Food and Nutrition Service. 2010f. Supplemental Nutrition Assistance Program. National Data Bank Public Use data provided to NCCP by SNAP National Outreach Coordinator, Jan. 3, 2011.
50. Estimated as the number of citizen children with at least one noncitizen parent whose family income meets SNAP gross income eligibility standards but are not participating in the program. Leftin (2010) estimates non-participants at about 1.7 million using a different methodology and data source.
51. United States Department of Agriculture, Food and Nutrition Service. 2010i. Supplemental Nutrition Assistance Program: Outreach Coalition Minutes. Accessed Dec. 22, 2010 at <http://www.fns.usda.gov/snap/outreach/coalition/1-10-108.htm>.
52. The National Conference of State Legislatures reports that the number of bills related to immigrants and immigration signed into law rose more than four-fold in the four years between the 2005 and 2009 state legislative sessions. Most of these bills imposed restrictions on immigrants. National Council of State Legislatures. 2010. Immigrant Policy Project. Accessed Aug. 11, 2010 at <http://www.ncsl.org>.
53. United States Department of Agriculture, Food and Nutrition Service. 2010i. Supplemental Nutrition Assistance Program: Outreach Coalition Minutes. Accessed Dec. 22, 2010 at <http://www.fns.usda.gov/snap/outreach/coalition/1-10-108.htm>.
54. Vericker, T.; Fortuny, K.; Finegold, K.; Ozdemir, S.B. 2010. *Effects of Immigration on WIC and NSLP Caseloads*. Washington, DC: Urban Institute.
55. Rosenbaum, D.; Super, D. 2005. *The Food Stamp Program: Working Smarter for Working Families*. Washington, DC: Center for Budget and Policy Priorities.
56. Capps, R.; Koralek, R.; Lotspeich, K. 2004. *Assessing Implementation of the 2002 Farm Bill's Legal Immigrant Food Stamp Restorations: Final Report to the United States Department of Agriculture*. Washington, DC: Urban Institute.
57. Broder, T.; Wheeler, C.; Bernstein, J. 2005. *Immigrant Eligibility for Public Benefits*. Los Angeles: National Immigration Law Center. Accessed Jan. 5, 2011 at http://www.nilc.org/immspbs/special/imm_elig_for_pub_bens_aila_0305.pdf.
58. United States Department of Agriculture, Food and Nutrition Service. 2010j. SNAP Policy on Immigrants and Access Issues. Accessed Dec. 29, 2010 at <http://www.fns.usda.gov/snap/outreach/coalition/1-10-108.htm>.
59. United States Department of Agriculture, Food and Nutrition Service. 2010j. SNAP Policy on Immigrants and Access Issues. Accessed Dec. 29, 2010 at <http://www.fns.usda.gov/snap/outreach/coalition/1-10-108.htm>.
- United States Department of Agriculture, Food and Nutrition Service and United States Department of Health and Human Services. 2000. Policy Guidance Regarding Inquiries into Citizenship, Immigration Status and Social Security Numbers in State Applications for Medicaid, State Children's Health Insurance Program, Temporary Assistance for Needy Families, and Food Stamp Benefits. Washington, DC: Authors.
- United States Department of Agriculture, Food and Nutrition Service. 2003. *Non-citizen Requirements in the Food Stamp Program*. Alexandria, VA.
- The Inter-Agency Letter of September 28, 2000 provides operative guidance on these matters (USDA, 2000; USDA, 2010j). Nevertheless, a third document creates ambiguity by stating that "[a]lternatively, a State agency may follow guidelines issued in a Sept. 1, 1982, FNS memorandum which recommended that an immigrant should be reported to the INS [U.S. Immigration and Naturalization Service] when there is an admission by the application or another household member (or the household's authorized representative) that illegal aliens are present in the household" (USDA, 2003, p. 23). It is imperative that state SNAP program administrators direct staff to adhere strictly to the guidelines set forth in the Inter-Agency Letter if the policy objective of increasing program participation among eligible members of immigrant families is to be achieved.
60. United States Department of Agriculture, Food and Nutrition Service. 2010j. SNAP Policy on Immigrants and Access Issues. Accessed Dec. 29, 2010 at <http://www.fns.usda.gov/snap/outreach/coalition/1-10-108.htm>.
61. Broder, T.; Wheeler, C.; Bernstein, J. 2005. *Immigrant Eligibility for Public Benefits*. Los Angeles: National Immigration Law Center. Accessed Jan. 5, 2011 at http://www.nilc.org/immspbs/special/imm_elig_for_pub_bens_aila_0305.pdf.
62. United States Department of Agriculture, Food and Nutrition Service. 2010k. Supplemental Nutrition Assistance Program: Improving Access to SNAP through Broad-Based Categorical Eligibility. Accessed Jan. 5, 2011 at <http://www.fns.usda.gov/pd/snapmain.htm>.