## Food Research & Action Center New Data Reveal Stark Decreases in SNAP Participation Among U.S. Citizen Children Living With a Non-Citizen

new Food Research & Action Center (FRAC) analysis of U.S. Department of Agriculture Supplemental Nutrition Assistance Program (SNAP) Quality Control data finds that national participation in SNAP among U.S. citizen children in households with a non-citizen dropped by 22.5 percent — more than 718,000 children from fiscal years 2018–2019 (latest available data).

This represents a decrease that is five times greater than that of the decrease in participation among U.S. citizen children in citizen-only households.

From fiscal year 2016 to fiscal year 2019, participation among U.S. citizen children living with a non-citizen decreased 35.6 percent, compared to 12.3 percent in citizen-only households.

While many factors contribute to decreases in SNAP participation — most notably an improved economic situation for households — these data strongly suggest that anti-immigrant policies and attacks on immigrants fueled by the Trump administration harmed participation in SNAP among U.S. citizen children in mixed-status families.

These data paint a powerful picture that underscore the need for work at the federal policy level and local community level to ensure all families are able to access the nutrition and health-bolstering support SNAP provides — a need that has only been exacerbated by the COVID-19 pandemic and the resulting substantially elevated levels of hunger, particularly among Black and Latinx households with children.

Anti-hunger advocates must continue to fight fear with facts to ensure eligible families have access to the nutrition they need. Ensuring that all families and individuals, regardless of immigration status, are nourished and healthy is key to creating a thriving nation.

#### Fiscal Years 2016–2019: A Stunning Decrease in Participation for U.S. Citizen Children Living With a Non-Citizen

The table below illustrates how SNAP participation among U.S. citizen children decreased more rapidly for children living in mixed-status households compared to children in citizen-only households during fiscal years 2016–2019. This was the case from year to year, as well as for the overall time period (from fiscal years 2016–2019). This coincides with an onslaught of attacks on immigrants — particularly immigrants of color — during the Trump administration. Of note, the **Trump-era public charge rule and other anti-immigrant policies** accelerated fears about participation in public benefit programs, including SNAP. This rule is no longer in effect, as of March 9, 2021. (For more information, refer to appendices A and B.)

|                           | U.S. Citizen Children<br>Living With Only Citizens |   | U.S. Citizen Children<br>Living With Any Non-citizen* |   |
|---------------------------|--|---|---|---|
| Fiscal Year               | Number   | Percent Change From<br>Previous Fiscal Year | Number  | Percent Change From<br>Previous Fiscal Year |
| 2016                      | 14,942,489   |   | 3,836,729   |   |
| 2017                      | 14,295,253   | -4.3  | 3,418,499   | -10.9                                       |
| 2018                      | 13,706,843   | -4.1  | 3,188,012   | -6.7  |
| 2019                      | 13,099,824   | -4.4  | 2,469,652   | -22.5                                       |
| Net Change<br>(2016–2019) | -1,842,665   | -12.3                                       | -1,367,077  | -35.6                                       |

# TABLE 1: National Change in SNAP Participation Among U.S. Citizen Children Living With a Non-Citizen and U.S. Citizen Children Living With Only Citizens in an Average Month, Fiscal Years 2016–2019

\*Non-citizen may be inside or outside of the SNAP household.

Source: FRAC's analysis of U.S. Department of Agriculture SNAP Quality Control data

# Fiscal Years 2007–2019: SNAP Participation Trends Underscore the Significance of the Fiscal Year 2019 Drop



FIGURE 1: Percentage Change in SNAP Participation Among U.S. Citizen Children Living With Any Non-Citizen and U.S. Citizen Children Living With Only Citizens, Fiscal Years 2007–2019

As per figure 1, the trends in participation from fiscal years 2007–2019 suggest how the broader economic and political climate may affect participation in SNAP by immigrant households, with participation rates increasing as nutritional needs grew during the Great Recession, then decreasing in



the years after. The particularly large increase among U.S. citizen children in households with a non-citizen from fiscal years 2008–2010 may suggest that immigrant parents may be more willing to overcome fears and access SNAP for their U.S. citizen children during tough economic times.

In most years after the Great Recession and prior to the arrival of the Trump administration (fiscal years 2011–2015), the percentage changes in participation rates for U.S. citizen children in the two family cohorts were unremarkable. These rates stayed within a few percentage points of each other except for the change from fiscal years 2012–2013, where participation by U.S. citizen children in households with a non-citizen increased by 8.8 percent and participation in citizen-only households increased by 0.1 percent. (Interestingly, the fiscal year 2013 increase in the participation rate for U.S. citizen children residing in non-citizen families coincided with the start of the Deferred Action for Childhood Arrivals program. DACA recipients are not eligible for SNAP.)

During the Trump administration, the range of threats and anti-immigrant policies that created fear and confusion likely gave rise to the sharp decrease in SNAP participation among U.S. citizen children in non-citizen households from fiscal years 2018–2019. No other year saw such a drastic decline in participation among U.S. citizen children living with a non-citizen.

#### **Action is Needed**

Since the 1996 legislation that denied SNAP and other benefits to many lawfully present immigrants, research has shown that eligible immigrant families — including those with U.S. citizen children — have forgone assistance from SNAP due to a range of obstacles. These obstacles include those unique to immigrant families, as well as those faced by nonimmigrant families.

With the pandemic ushering in unprecedented rates of food hardship, disproportionately hitting households with children, and even more disproportionately households of color with children, these distressing fiscal year 2019 findings should sound an alarm.

Fortunately, there are concrete steps that can — and must — be taken to ensure immigrant families can access SNAP.

Moving forward, advocates can help connect more immigrants to SNAP by working with the Biden administration and Congress to rescind arbitrary and harsh eligibility rules that terminate, impede, or undercut access for the many people whose struggles have increased because of COVID-19, and that exacerbate racial and health inequities. Advocates must ensure that COVID-19 policies, which have increased the adequacy of SNAP benefits and



have streamlined the application and recertification process, continue after the pandemic.

The March 2021 blocking of the Trump-era Department of Homeland Security public charge rule is a critical step, but more must be done. Federal, state, and local agencies, as well as schools, health care providers, food banks and other community organizations, must make clear to immigrants and their families that many immigrants are eligible for SNAP and that they and their children can access the important nutrition and health benefits of SNAP without fear of public charge considerations. On the policy side, rescinding the five-year bar that disqualifies many adults with legal permanent resident status from receiving SNAP and extending SNAP eligibility to all lawfully residing immigrants would be steps in the right direction.

This report was authored by FRAC's Alexandra Ashbrook, director of special projects and initiatives, with assistance from Susan Beaudoin, senior special projects and initiatives associate, and with contributions from Ellen Vollinger, legal/food stamp director. Thanks to our partners at the Protecting Immigrant Families Campaign, co-chaired by Center for Law and Social Policy and National Immigration Law Center, and at UnidosUS for their helpful feedback.

### **Appendix A**

National SNAP Participation Among U.S. Citizen Children Living With a Non-Citizen and U.S. Citizen Children Living With Only Citizens in an Average Month, Fiscal Years 2007–2019

|             | U.S. Citizen Children<br>Living With Only Citizens |   | U.S. Citizen Children<br>Living With Any Non-citizen |   |
|-------------|--|---|--|---|
| Fiscal Year | Number<br>(000)                                    | Percent Change From<br>Previous Fiscal Year | Number<br>(000)                                      | Percent Change From<br>Previous Fiscal Year |
| 2007        | 10,664   |   | 1,873  |   |
| 2008        | 11,236   | 5.4%  | 2,073  | 10.6%                                       |
| 2009        | 12,737   | 13.4%                                       | 2,636  | 27.2%                                       |
| 2010        | 14,691   | 15.3%                                       | 3,545  | 34.5%                                       |
| 2011        | 15,849   | 7.9%  | 3,741  | 5.5%  |
| 2012        | 16,361   | 3.2%  | 3,828  | 2.3%  |
| 2013        | 16,384   | 0.1%  | 4,163  | 8.8%  |
| 2014        | 15,792   | -3.6%                                       | 4,133  | -0.7%                                       |
| 2015        | 15,639   | -1.0%                                       | 3,921  | -5.1%                                       |
| 2016        | 14,942   | -4.5%                                       | 3,837  | -2.2%                                       |
| 2017        | 14,295   | -4.3%                                       | 3,418  | -10.9%                                      |
| 2018        | 13,707   | -4.1%                                       | 3,188  | -6.7%                                       |
| 2019        | 13,100   | -4.4%                                       | 2,470  | -22.5%                                      |

Source: FRAC's analysis of U.S. Department of Agriculture SNAP Quality Control data

| Appendix B: Timeline of Changes to Public Charge Policy from 2016–2019 |  |  |  |  |
|--|--|--|--|--|
| JANUARY<br>2017  | Vox publishes a <u>leaked draft executive order</u> . The leaked draft notes that receiving any benefit "determined in any way on the basis of income, resources, or financial need" (like SNAP) could subject not just the person receiving the benefit to severe immigration consequences, such as inadmissibility and deportation, but also their family.   |  |  |  |
| JANUARY<br>2018  | In discussions about protecting immigrants from Haiti, El Salvador, and African countries as part<br>of a bipartisan immigration deal, Trump questions why so many people from these "shithole<br>countries" come to the U.S.  |  |  |  |
| JANUARY<br>2018  | Changes in the U.S. Department of State's Foreign Affairs Manual (FAM) radically shift the public charge determinations made by embassies and consular offices relating to who can come into the U.S. The FAM includes a heightened focus on income/wealth, and allows officers to consider participation by the applicant or family members in a range of benefits, including SNAP, school meals, WIC, LIHEAP, soup kitchens. Having an affidavit of support is no longer enough to overcome a public charge determination, unless from a sponsor with a high enough income.  |  |  |  |
| FEBRUARY<br>2018   | Media published a leaked draft of a U.S. Department of Homeland Security <u>Notice of Proposed</u><br><u>Rulemaking (NPRM)</u> that would radically change the long-standing public charge doctrine<br>and make it much harder for low-income people and their families to immigrate or gain lawful<br>permanent residency. The leaked draft proposed allowing immigrants' use (or that of their<br>dependent family members, including U.S. citizen children) of an expanded class of programs —<br>potentially most means-tested public benefits — to be considered in a public charge determination.<br>(Note: The draft rule released for public comment and the final rule issued by the Department of<br>Homeland Security did not include use of benefits by family members and included a defined list of<br>programs that could be considered.) |  |  |  |
| OCTOBER 2018   | Department of Homeland Security public charge rule released for a 60-day comment period.   |  |  |  |
| DECEMBER<br>2018   | Department of Homeland Security public comment period closed with 266,000 comments submitted.  |  |  |  |
| AUGUST<br>2019   | Department of Homeland Security published a final rule related to public charge in the Federal Register.   |  |  |  |
| OCTOBER<br>2019  | Department of Homeland Security rule scheduled to take effect absent legal or congressional action.  |  |  |  |

The 2019 public charge rule was removed, effective March 9, 2021. SNAP is no longer considered in public charge tests.