View xForm - Project Application v6

This form is for new projects that have not been previously approved by CPHS.

Data entry
– Submitted 10/13/2025 7:38 PM ET by Jennifer Hogg, MPA

Amendment Header

Amendment Submitter

> October 2025 cycle
>
> > 09/29/2025 • Nicholas Zadrozna • Internal

> INTERNAL NOTE:
>
> POTENTIAL FULL BOARD AMENDMENT FOR THE DECEMBER CYCLE
>
> .
>
> > 10/13/2025 • Sussan Atifeh • Internal

> Note from the Primary Reviewer: I believe this amendment should be reviewed by the full committee at the next meeting. In the e-mail to students, it is stated: "We've identified you as someone who may be eligible for CalFresh." Can you provide information to the students how they have been identified? Was it from their financial aid applications? Can you provide a copy of the preapplication check list that will be provided to students? Is there any form of informed consent provided to the potential participants? Perhaps an informational sheet could be provided to the students with the check list and you could apply for waiver of informed consent? Technically it seems this may need to come to the full committee, but let me look at the proposed text for the e-mails and changes in the procedures section.
>
> > 10/16/2025 • Nicholas Zadrozna • Internal

Jennifer Hogg, MPA

Email: jennifer.hogg@berkeley.edu   **Business:** (517) 243-0724

Instructions for amending your approved application:

This is a copy of the project application in order to amend the project. You must answer all the amendment questions. After you've answered those questions, you will have to update all answers on the form that related to your proposed changes. You may leave other questions with their original answer. If you do not update the appropriate responses on the form related to your proposed amendment, you will be required to make additional changes.

Note that the contacts listed on this page are output only questions that cannot be changed. If you need to request personnel changes, you will be prompted later on within this form to enter the new contact information.

PI:

Jesse Rothstein, PhD

Email: rothstein@berkeley.edu   **Business:** (510) 495-0646

Administrative Contacts:

Name	Role
Jennifer Hogg, MPA	Administrative contact
Paul Martinez, BA	Administrative contact

Protocol Number:

2020-151

Protocol Title:

Student Supports: Eligibility and Take-Up of Safety Net and Financial Aid Programs Among College Students

Indicate what types of changes you are requesting to this project. Select all that apply

> Researchers, please deselect "Addition and/or removal of project personnel" and select "Research methodology and/or research questions", this should reflect the changes being requested in this amendment.
>
> 09/29/2025 • Nicholas Zadrozna • *Not* Internal • Resolved

Research methodology and/or research questions

Clearly summarize and justify your proposed changes to the protocol in layman's terms for all selections made above

Note from the Primary Reviewer of this project:

[As I understand it, the community colleges are going to be sending out emails to students with potential need, encouraging them to use application assistance for SNAP and other programs provided by the community colleges. The assistance is often provided already by the community colleges and the only thing that is new here is that they will send out a randomized e-mail and provide a $20 incentive for coming in for assistance. The community college will then provide information to your research team as to who received e-mails and who came in for assistance. You will use your data system to track the SNAP and other program usage of those who came in for assistance vs. those who didn't. Is this correct? If we are to review this, we will need to see copies of the e-mails and the procedures need to be described fully in the procedures section of the research protocol. If participants receive any assistance outside of the usual we will need information about that special assistance. Technically it seems this may need to come to the full committee but let me look at the proposed text for the e-mails and changes in the procedures section.]

****

Please address the note from the Primary Reviewer of this project/amendment in this section.
Thanks.

,

   10/13/2025 • Sussan Atifeh • *Not* Internal

One of this project's core research questions, RQ4, is "How successful have efforts (undertaken by CSAC, the higher education segments, CDSS, or others) designed to increase take-up of safety net programs, been in improving program take-up, improving student academic success, and lowering rates of financial distress, especially during COVID?"

One such effort that we now wish to evaluate is providing students with CalFresh application assistance on their college campus, via their Offices of Student Basic Needs. This is a common practice across California campuses. We would like to evaluate this practice using random assignment, emailing students in the treatment group with a link to sign up for an appointment. To encourage students to attend these appointments (and be better-positioned to identify the impact of this practice,

if there is one), we will to offer $20-$25 gift card incentives, administered by the Offices of Student Basic Needs. We are currently seeking funding from philanthropy to cover the cost of these incentives.

Indicate the Level of Risk involved with the changes proposed.

If level of risk has changed, please update the "Risks" section in the protocol form.

Level of Risk has not changed

PI City Output *(Internal)*

Berkeley

PI Location State Output *(Internal)*

California

Personnel Information for Amendment

Please complete the questions below.

If while trying to complete those questions, personnel are not found by their email address, you can add them in the system by completing the 'new contact form'. Click on the form and complete it. Within a few minutes of completing the form you will receive an email notifying you of the availability of the new contact. You should then be able to add them in the subsequent questions.

New Contact Form

Existing Personnel

Name	Role
Adrienne Tanner	Responsible Official
Alan Perez, BA	Research Team
Cara Tan, BS	Research Team
Catherine Lott, MPH	Research Team
Charles Davis, B.A.	Research Team
Christopher Daniels, MS	Research Team
Elise Dizon-Ross, PhD	Research Team
Evan White, JD MPP	Research Team
Gabrielle Lohner	Research Team
Gary Gremaux	Research Team
Huizhi Gong, Master of Science	Research Team
Igor Chirikov, PhD	Research Team
Jennifer Hogg, MPA	Administrative contact
Jesse Rothstein, PhD	Principal Investigator
Jessica Lasky-Fink, MA	Research Team
Johanna Lacoe, PhD	Co-Principal Investigator
Justine Weng, BA	Research Team
Kassandra Hernandez, MPP	Research Team
Katie Butterfield, PhD	Co-Principal Investigator
Maggie Jones, PhD	Research Team
Nicholas Gebbia, Bachelor's; PhD (ongoing)	Research Team
Paul Martinez, BA	Administrative contact
Sam Ayers, BA	Research Team
Sarah Hoover, BA	Research Team

Will you be making any changes to the makeup of research personnel?

*No change in personnel

Project Information

SUBMITTER

Application completed by:

Jennifer Hogg, MPA
   Email: jennifer.hogg@berkeley.edu   **Business:** (517) 243-0724

PREVIOUSLY APPROVED EXEMPTION

Is there a previously-approved exemption from CPHS for this project?

No

PROJECT TITLE

Enter the project title (please capitalize each word in your title).

Student Supports: The Role of Social Safety Net Programs in Student Success

STUDY PROCEDURES

Indicate the study procedures involved in this research. Check all that apply.

Data Registry
Program Evaluations

TYPE OF RESEARCH REQUEST

Indicate which of the following applies to this research. Check all that apply.

*Death Data Only refers to health-related studies requesting existing mortality data from **within** the California Human Health Services Agency (CHHSA)*

*SB-13 (Information Practices Act) refers to health-related studies requesting existing data from **outside** the CHHSA (e.g. California Department of Corrections and Rehabilitation [CDCR], California Department of Education [CDE], etc.) **OR** studies requesting data **within** the CHHSA that are not state funded or involving state staff.*

Common Rule/Human Subjects refers to health-related studies that involve direct or indirect interaction with human subjects (e.g. recruitment, interviews, etc.)

*Common Rule Only refers to health-related studies requesting existing data from **within** the CHHSA (e.g. Office of Statewide Health Planning and Development [OSHPD], California Department of Public Health [CDPH], etc)*

SB-13 (Information Practices Act)

PROJECT TYPE DETAILS

Indicate which, if any, apply to this research. Check all that apply.

If the research does not involve any of following, choose "None of the above."

Minimal Risk
Informed Consent Waiver

VULNERABLE POPULATIONS

Indicate which vulnerable populations, if any, will be involved with this research. Check all that apply.

If vulnerable populations are not part of the research, choose "Not applicable."
Note regarding minors: in the United States, a minor is under 18 years of age. If research is conducted outside the United States, a minor is under the age of majority in the countries where research is to be conducted.

Not applicable

FUNDING

Is this research funded?

Yes

Indicate the funding source for this project.
Federally funded
Privately funded
University funded

Enter name of federally-funded source.
Institute of Education Sciences (SPO 054057) and U.S. Department of Agriculture (USDA)'s Research Innovation and Development Grants in Economics (RIDGE) Partnership

Please check the criteria below that you think your project meets to qualify for an expedited review. If none of these expedited criteria are appropriate for your project, choose 'not applicable'; your protocol will be reviewed by the full committee. Note that CPHS will make the final determination of whether the project meets the criteria for expedited review.

Protected Health Information/Personally Identifiable Data (PHI/PID) is defined as information in any format that identifies the individual, including demographic information collected from an individual that can reasonably be used to identify the individual. Additionally, PHI is information created or received by a healthcare provider, health plan, employer, or health care clearinghouse; and relates to the past, present, or future physical or mental health or condition of an individual, including any of the 18 HIPAA identifiers.

Note: Please be aware that individual participants may be identifiable by combining other items in the data even when none of the 18 HIPAA identifiers are present. Thus, a study may still contain PID even after removing or never acquiring the identifiers, and the investigator may still need to provide complete answers for the data security questions in the protocol.

**The Departments within the California Health and Human Services Agency (CHHSA) are: Aging, Alcohol and Drug Programs, Child Support Services, Community Services and Development, Developmental Services, Emergency Medical Services Authority, Health Care Services, Mental Health, Public Health, Rehabilitation, Social Services and Statewide Health Planning and Development.

New project requesting only previously existing PHI/PIDs involving CHHSA department funding, research staff or patients from state mental hospitals (Common Rule review)

ANTICIPATED PROJECT START DATE

Projects cannot begin before they have been reviewed. The earliest possible start date is always the date of the next public meeting at which the project will be heard.

For a list of public meeting dates, see the CPHS website

08/07/2020

ANTICIPATED PROJECT END DATE

01/01/2027

Project Details

Include a brief statement, less than 500 words, describing the research project. Be sure to address the background for the project, including relevant literature, the major research questions to be addressed, and the expected end product (e.g., article, report or other publications). Include the location(s) where the project will take place. The summary should be understandable to the general public.

Students who are hungry will have trouble learning and succeeding in school. In 2014, an estimated 20.9 percent of children nationwide lived in households that experienced food insecurity (Coleman-Jensen et al., 2016). While large strides have been made in ensuring that K-12 students in need of assistance receive free or reduced price school meals, there have been fewer efforts focused on student access to SNAP/CalFresh. A 2016 report by PPIC found that 51 percent of all CA children were enrolled in the school lunch program in 2015, while only 24 percent participated in CalFresh, concluding that there was "substantial potential to expand the impact of nutrition programs."

Similarly, among the college student population, many students may be eligible but not participating in CalFresh and other programs that can reduce financial hardship like financial aid. Recent studies have found that 20% of eligible community college students in CA do not receive Pell Grants (Martorell and Friedmann, 2018) and 78% of undergraduate students in CA (around 250,000) who were eligible for CalFresh did not participate in the program (Alison, 2018). CDSS, CCCCO, UCOP, CSUCO, and CSAC are working to close these gaps and there is increasing interest from policymakers, however this work has faced data limitations. Without access to linked administrative data, it is impossible to know whether survey-based measures of take-up are accurate or whether outreach efforts are effective (George et al., 2018).

This research study will examine K-12 and college student eligibility for, usage and impacts of safety net benefits and financial aid, filling the gaps in the current knowledge base described above. It will be a partnership between CDSS, CSAC, CCCCO, CSUCO, CDE, and the University of CA's CA Policy Lab (CPL) and Office of the President (UCOP). The research questions are: Do social safety net programs help promote educational success among K-12 and college students? How many students are eligible for or receive benefits? How much continuity is there in benefits usage between K-12 and college? Does receiving benefits reduce student financial distress or food insecurity, or improve student well-being or academic success? Can these agencies change their strategies to increase their chances of reaching these non-recipients in order to help them succeed?

MAJOR RESEARCH QUESTION

What is the major research question to be addressed in this project?

This project will address the following research questions:
1. Do students access safety net programs, such as the Supplemental Nutrition Assistance program (SNAP), when they are eligible?
1a) How many students participate in safety net programs, including CalFresh and CalWORKs?
1b) How do participation rates vary across student demographics?
1c) What fraction of eligible students do not receive benefits, and how do overall take-up rates vary with student characteristics?
1d) What is the distribution of monthly CalFresh amounts for college students before, during and after the COVID-19 pandemic emergency allotments? How does this relate to participation trends?

2. Is participation in CalFresh (and, potentially, other programs) associated with higher rates of student academic success or lower rates of food insecurity or financial distress compared with observably similar students who are eligible for but do not participate?

3. What are the opportunities and limitations for post-secondary institutions to use administrative data, including UC CCP data, to identify students eligible for safety net benefits?

4. How successful have efforts (undertaken by CSAC, the higher education segments, CDSS, or others) designed to increase take-up of safety net programs, been in improving program take-up, improving student academic success, and lowering rates of financial distress, especially during COVID?

5. How much continuity is there in CalFresh participation between high school and college, for those who pursue postsecondary education? Are there student characteristics that can be used to predict continuity or lack thereof, with a view toward designing outreach aimed at increasing usage of CalFresh among college students who received benefits while in high school?

STUDY PROCEDURES

Describe in detail all procedures for this research. Do not attach grant applications or similar documents. Information in this application must be sufficient to fully explain the procedures without such documents

This study will involve linking previously existing, routinely collected, de-identified administrative data from CCCCO, CSUCO, UCOP, CDSS, CSAC, and CDE, as well as credit data in the UC CCP. The data from UCOP will also include survey data from their Undergraduate Experience Survey (UCUES). This linked dataset will then be used to accurately estimate the number of students who participate in safety net programs and financial aid, and who are eligible but do not currently participate. It will also enable analysis of which student segments are most and least likely to receive the aid for which they are eligible, and observational comparisons of longer-term student success measures between recipients of safety net programs and financial aid and otherwise similar non-recipients. The study will involve three phases, with procedures detailed below for each:

Phase 1. We will create an individual-level linked Student Supports database combining routinely collected, de-identified individual records from CCCCO, UCOP, CSAC, CDSS, CDE, and UC CCP. This will allow us to cross-reference information from student FAFSAs, financial aid and safety net program status, enrollment, academic outcomes, and financial wellbeing.

Each agency will use a hashing process to encrypt names, dates of birth (DOBs), and Social Security Numbers (SSNs). County and zip codes will not be encrypted, and researchers will not receive addresses. This will use the cryptographic hash algorithm SHA-256, specified in the Federal Information Processing Standards: FIPS 180-4, Secure Hash Standard. Partner organizations will agree on a key amongst themselves, which will not be shared with researchers under any circumstances, so as to obfuscate the original values in the data and ensure the hashing cannot be reverse engineered. Once de-identified, individual level data will be transferred to researchers to conduct the hashed merge linkage process. This process will enable researchers to identify matching records, without having access to the underlying personally identifiable information that is being matched. The hashing algorithm ensures that the PII cannot be recovered from the hashed data by researchers or attackers, even if attackers somehow obtained access to the key.

Phase 2. We will use the linked data to estimate rates of participation in safety net programs. We will use data from CDE and the higher education segments' records, CCCCO and UCOP, and from FAFSAs held by CSAC to construct measures of student eligibility for safety net programs, financial aid, and tax credits. Rules will be created for the analysis based on unique eligibility criteria for programs such as: CalFresh (SNAP), CalWORKS (TANF), CalGrants, Pell Grants, Women Infant and Children (WIC) Support, Work Study, and the Earned Income Tax Credits.

We will conduct analysis to closely approximate the most important criteria for eligibility in each program. We will validate our eligibility measures by comparing these figures to survey estimates from the American Community Survey and the Beginning Postsecondary Students Survey, data provided by CDSS on CalFresh and CalWORKS enrollment, and data provided by UCOP, CCCCO and UC CCP on students' status regarding eligibility criteria for supports such as financial aid, CalWORKs and programs that can make students eligible for CalFresh (such as the Extended Opportunity Programs and Services (EOPS) and the Cooperative Agencies Resources for Education (CARE) program).

Phase 3. The third phase of our analysis will explore the relationship between take-up of aid and safety net programs and academic outcomes, food insecurity, and financial distress. We will compare students receiving services to other students who appear eligible but are not participating in programs. We will use propensity score matching to ensure comparability between the groups on demographics and financial and academic histories. Then, we will estimate multiple regression models of student outcomes on service receipt, considering outcomes including grades, standardized test scores, and course-taking (among high school students), and retention, unit completion, grades, transfer to 4-year college, degree completion, and time to degree completion (among college students). We will also evaluate agency efforts to use administrative data to promote program take up amongst students, examining their success on actual program take up, improving student outcomes (such as academic success and financial wellbeing).

Phase 4. The fourth phase of this project will estimate the impact of efforts undertaken by our partners to increase take-up of CalFresh, including campus-based application assistance. To estimate the effectiveness of SNAP application assistance, we will partner with of 5-10 colleges who already offer this service. These colleges will send out emails (email text attached) to a randomly-selected sample of students with demonstrated need (specifically, zero or negative Student Aid Index calculated from their FAFSA applications, as identified by each college's financial aid office). The email will offer them a $20-$25 incentive to students who attend an appointment. The colleges will then send the Chancellor's office information on who was emailed and who received assistance, and the Chancellor's Office will de-identify that information and share it with CPL. We will then compare the CalFresh participation rates of students who were emailed and who came in for assistance with those who were not. The application assistance services that students will be provided will be the same as what these schools currently offer, and students who did not receive the email will still be able to access these services. We have also attached an implementation checklist that we will provide to participating campuses.

Please upload here any tables or charts related to your study procedures and any materials (such as surveys or interview questions) that will be presented to participants.

Research on Student Supports - Methodology 07 15 2020.docx	Misc/Other
Campus Manual_ Evaluation of App Assistance.docx	Other Documents
Email to students_CalFresh Application Assistance Appointments.docx	Other Documents

DECEPTION

Will deception be used in this study?

No

CALIFORNIA HEALTH AND HUMAN SERVICES AGENCY (CHHSA) DEPARTMENTS LIST

Indicate any of the following CHHSA department(s)' involvement in providing research staff, funding and/or patients from State mental hospitals for this project.

CDSS: Department of Social Services

STATE DEPARTMENT DATA/SPECIMENS

Choose the department(s) from which you are requesting data and/or specimens and provide the formal name of the database or specimen registry. After you have selected the department from the drop down and entered the formal name of the database or specimen registry, click 'add' and repeat to add additional data and/or specimens if applicable.

Agency	Provide the formal name of the data base or specimen registry.
California Department of Social Services	Medi-Cal Eligibility Data System

Study Population

DATABASE DETAILS

List the database(s) to be used and the time period(s) being requested. This may include requests for future data that is not available at this time.

List the variables being requested, including a brief description of each variable. Justify the need for each variable and for the quantity of data being requested. You may also attach a list of variables on the next question.

Also address if participants will be involved in any other studies.

CPL has existing Data Use Agreements with each agency. The agreements will allow for the following data to be shared and used for the purposes of this project. CDSS, CSAC, CCCCO, CDE, CSUCO, and UCOP will provide data on safety net program applicants and recipients, FAFSA applicants and K-12 and college students. This combination of datasets will allow researchers to examine the eligibility for, usage of, and impacts of financial aid and safety net benefits, by students enrolled in K-12 and higher education. All data will come from existing administrative databases -- and one survey -- routinely collected by the partner organizations.

CDSS will provide de-identified, individual-level data regarding the universe of CalFresh applicants and recipients, including their demographic characteristics, county and zip code of residence, income, household composition, and CalFresh application outcomes, enrollments and allotments. CDSS will also provide de-identified, individual-level data from the MediCal Eligibility Data System (MEDS) files. Variables will include measures of participation in CalFresh, CalWorks, and other safety net programs, along with rosters of the members on each CalFresh case and earnings and asset information used to judge CalFresh eligibility.

Data from FAFSAs held by CSAC will include de-identified student-level data on financial aid applications and offers. This will be used to construct measures of student eligibility for safety net programs, financial aid and tax credits, as programs have criteria including income limits and participation in grants, such as Pell and Cal Grants.

Data from CCCCO, CSUCO, and UCOP will cover University of California, California State University, and California Community College student enrollment, status regarding financial aid and certain employability programs. In addition, evaluations of outreach efforts will include treatment information that will be linked to the higher education administrative data. Data from CDE will include California K-12 student enrollment, demographics, and outcomes standardized test achievement and course-taking. These datasets will contribute to eligibility estimates and also allow researchers to explore the impacts of safety net programs on student success and educational outcomes.

Researchers will receive up to 15 years of historical administrative data from each partner agency . This will allow researchers to analyze some de-identified records for students from FAFSA applications and through college to degree attainment, to provide a longitudinal assessment of the impact of safety net participation on student success measures such as graduation. It will also allow researchers to measure changes in eligibility and take-up through changing economic conditions.

Additionally, the UC CCP dataset will provide anonymized information on household credit, debt, income, and mobility synthesized into consumers' credit histories. This dataset holds demographic information (gender, age, geography, and household count) and credit information (credit scores and tradeline-level information about

each loan or collections item, including payment history, credit limits and balances, and various information about the type and status of those tradelines). This dataset will allow researchers to examine the impact of safety net programs on financial wellbeing and distress, and also may help in estimating safety net program eligibility for individuals who did not submit applications for federal aid (and therefore do not show up in CSAC data).

Finally, data from Compton College will allow us to evaluate one particular effort to increase efforts to increase take-up of CalFresh. Compton College will provide the treatment status of students who participated in the "Evaluation of Pilot CalFresh Nudges at Compton College" led by the HOPE Center at Temple University. This will allow us to measure the impact of this text-based nudging intervention on CalFresh application and enrollment.

If you have a list of variables with the details requested in the above question, attach that here. If you provided all details on the database in the question above, skip this question.

01. Student Supports - Research questions and data use.docx	List of Variables
02. CSAC - Variables list.docx	List of Variables
03. CCCCO - Variables list.docx	List of Variables
04. CDSS - Data description 210308	List of Variables
CDE Variables List.docx	List of Variables
Student Supports - CSU data.docx	List of Variables
UC CCP data elements	List of Variables
University of California Office of the President (UCOP)	List of Variables

STUDY DURATION

Estimate the probable duration of the entire study. This estimate should include the total time each subject is to be involved and the duration of each data collection about the subject.

E.G., This is a two-year study. Participants will be interviewed three times per year; each interview will last approximately two hours. Total approximate time commitment for participants is 12 hours.

The study will analyze up to 15 years of historical administrative data (from 2010 to 2020, and eventually extended to 2025) provided to the researchers by CDSS, CSAC, UCOP, CSUCO, CCCCO, CDE, and UC CCP on safety net program applicants and recipients, FAFSA applicants, and students. This combination will allow researchers to analyze de-identified records for students from FAFSA applications, through college to degree attainment, to provide a longitudinal assessment of the impact of safety net participation on student success.

There is no time commitment. This study is limited to analyzing already collected administrative data by individuals who have completed financial aid forms, enrolled in college or applied for safety net programs.

Risks and Benefits

RISK DESCRIPTION

Provide a description of possible risks to participants: physical, psychological, social, economic, loss of data security, and/or loss of confidentiality. Describe and justify whether the research is minimal risk or greater than minimal risk.

This study involves no more than minimal risk. There will be no human subject involvement beyond the analysis of the data already collected routinely by each organization to administer respective services. It will therefore require no further effort and impose no discomfort on participants, and will require no actions beyond those they have already taken.

Participants' data will be de-identified before being provided to the researchers, who will not have access to names, social security numbers, addresses, or other personally identifying information (PII), nor will the researchers have access to the key linking the coded data file to the PII. A hashed merge linkage process will allow us to link data from each of the participating agencies without receiving PII. Each agency hashes the PII that it itself holds, turning it into meaningless strings of characters, and only transfers data to CPL that have the hashed IDs in place of the PII.

To mitigate the risk of erroneously receiving PII that the research team are not permitted to have from the data owners, the data owner agency and the UC Berkeley research team has put in place the following procedures in addition to the administrative and physical safeguards listed in this protocol. Items 5-7 were added in May 2022:

1) The data owner and research team will correspond to confirm the exact contents of data files prior to any files being transferred, to ensure no PII is erroneously included.
2) The data owner will streamline internal communication processes to avoid misunderstanding about data transfers and requests.
3) The research team will check the variable names in the incoming data files, prior to any actual data being viewed, to ensure only de-identified data has been transferred to the research team.
4) The research team will continue to train and more regularly refresh staff on responding to incidents if they do occur, to ensure the research team can report incidents to data owners in a timely manner.
5) Before any data is sent to us, we will ask the analyst we are working with to confirm that someone other than themselves has looked at the first five rows of data to confirm there is no inadvertent PII in the file.
6) In addition to reviewing the variable names before looking at entries to ensure there is no variable that looks like it might contain PII, we will incorporate code that scans the first few lines of data and returns a list of variables that may include PII.
7) We will increase the amount of explicit communication that reiterates the importance of removing any PII prior to transfer.

Given the inadvertent transfer that occurred in November 2022, we are adopting new safeguards to provide timely reminders to staff that help them comply with existing policies:
-Currently, our IT Manager oversees the transfer of new data and alerts project team members when new data arrives via email. This email will now include an explicit reminder of (3) and (6) above.
-These procedures will be taught explicitly as part of the CPL onboarding curriculum

that every staff member receives.
-CPL's internal team overseeing projects involving hashed PII has updated its protocol to require an additional training prior to any staff member's first time managing the hashing and transfer process with a data partner, which will review these procedures in detail.

BENEFITS

Describe the benefits, if any, to the subjects or to society that will be realized as a result of this project. Discuss the benefits that may accrue directly to the subjects as well as to society. If there is no direct benefit anticipated for the subjects, state that clearly.

Students who receive outreach encouraging them to apply to CalFresh may be more likely to successfully enroll in the program and receive benefits that help them pay for food.

Apart from this relatively small group of beneficiaries, there are no immediate direct benefits to individuals in the study. Although the work will not benefit the specific students appearing in the data, most of whom will have already finished their college careers when the study begins, it will lead to improved public services and supports to similarly situated future students. Our study will contribute to our partners' understanding of how to increase take-up of programs designed to help students in need. Higher education, in particular community college, is a critical pathway for upward economic mobility. Rising costs of college have outpaced federal and state grant aid available, putting more pressure on students, many of whom experience food insecurity while studying. Policymakers are increasingly interested in using safety net programs not explicitly designed for college students, including supplemental nutrition aid (SNAP, or food stamps), cash welfare, and the Earned Income Tax Credit, to help college students meet their basic needs.

The proposed project is a comprehensive analysis of the role of social safety net programs in student success, only possible through an analysis of linked government and higher education administrative data. By linking data at the individual student level from multiple agencies, CPL researchers will be able to provide state policymakers with accurate estimates of the number of college students eligible for aid, and of who is eligible and missing out. This will be helpful to the government partners and higher education institutions who are designing and piloting efforts to increase take-up.

Adminstrative Safeguards

PERSONALLY IDENTIFIABLE DATA (PID) INSTRUCTIONS

Protected Health Information/Personally Identifiable Data (PHI/PID) is defined as information in any format that identifies the individual, including demographic information collected from an individual that can reasonably be used to identify the individual. Additionally, PHI is information created or received by a healthcare provider, health plan, employer, or health care clearinghouse; and relates to the past, present, or future physical or mental health or condition of an individual, including any of the 18 HIPAA identifiers.

Note: Please be aware that individual participants may be identifiable by combining other items in the data even when none of the 18 HIPAA identifiers are present. Thus, a study may still contain PID even after removing or never acquiring the identifiers, and the investigator may still need to provide complete answers for the data security questions in the protocol.

If the researcher demonstrates that he or she is unable to comply with any of the requirements below, he or she may request an exception from these requirements. The researcher should indicate any measures that will be taken to address this requirement. The exception request should be made in the text box of the corresponding requirement. An exception will only be granted if the researcher can demonstrate that adequate alternative measures have been taken to minimize risks so as to justify the exception.

HIPAA IDENTIFIERS

Please identify which HIPAA Identifiers you plan to request as part of your submission.

Address (all geographic subdivisions smaller than state, including street address, city county, and zip code)
All elements (except years) of dates related to an individual (including birthdate, admission date, discharge date, date of death, and exact age if over 89)

TRAINING PROCEDURES

Describe the procedures for training all research staff who have access to PID on privacy and security. Indicate if staff are required to sign a confidentiality statement related to general use, security, and privacy.

All researchers have been trained on the treatment of sensitive administrative data and the risks of re-identification. All researchers sign agreements to hold the data confidential and to never attempt to identify or contact any individual in the data. The secure system on which the analysis is conducted does not allow for downloading of any of the data.

STAFF VETTING PROCEDURES

Describe procedures, either background check or thorough reference check, for vetting staff who will have access to PID.

Upon hire, references were checked for all staff at California Policy Lab. Where relevant, references were asked about the staff member's proper handling of data including PII in their prior roles (e.g., at research centers and government agencies). In addition, where required by law, CPL staff members receive LiveScan background checks before accessing certain data.

SUPPORT LETTER

Obtain and submit a department support/data release letter.

This is a statement from the state agency or department you are receiving data from. It must be on that agency's/department's letterhead and should include both

1) that the release of the desired data is legal and

2) that the entity is willing to release the desired data to you, the researcher. If you are not receiving data, this letter should indicate that you are supported.

**For VSAC requests, if you do not have a Departmental Letter of Support (LOS)/Data Release, you may upload a copy of the Data Request Form (application) from the department to secure a review for the upcoming cycle. The protocol will not be approved until the LOS is uploaded to the protocol.

Please also review the CPHS Statement for Birth and Death Data.

CCCCO - IRB Support Letter 07 12 2020.pdf	Department Letter of Support
CDSS - IRB Suport Letter 07 07 2020.pdf	Department Letter of Support
CSAC - IRB Support Letter 07 07 2020.pdf	Department Letter of Support
CSU - IRB Support Letter 06 20 2025.pdf	Department Letter of Support
State IRB Support Letter CPL CDE Letterhead Rothstein 9.26.22.pdf	Department Letter of Support
UCCCP - Credit Bureau Agreement - 12 20 2019.pdf	Department Letter of Support
UCOP - IRB Letter of Support (final).pdf	Department Letter of Support

PREVENTING RE-USE AND UNAUTHORIZED ACCESS

Explain how you will ensure that data will not be reused or provided to any unauthorized person or entity.

Unauthorized means that the person or entity does not have a need to access the data for purposes of the research project approved by CPHS.

Data will be kept on CPL's secure servers with access limited to only the researchers who are working on this project and have completed all necessary trainings and prerequisites (such as LiveScan background checks, if needed) to be able to access data. Researchers have access only through encrypted remote shell or remote desktop and do not have the ability to download data from the server to their local computers. CPL's IT Manager and Director of Data Partnerships and Privacy together review data access permissions on a periodic basis to ensure they are still necessary for ongoing projects. The IT Manager also reviews access logs on a periodic basis to determine whether unauthorized access has occurred. CPL standard protocols for working with personally identifiable information (PII) require segregating this information wherever possible and making it available to users only when absolutely necessary.

CONFIDENTIALITY OF PUBLISHED DATA

Indicate whether information will be published that could possibly be used to identify an individual subject.

Information will not be published that could possibly be used to identify an individual subject. All reports released outside of CPL will consist only of tabulations and summaries of the data at high levels of aggregation. None will include information that would permit re-identification of subjects, either separately or in combination with other data.

All end products (such as an academic article, policy brief and partner report) will report only aggregate statistics across hundreds or thousands of individuals. No statistics for cells smaller than 10 individuals will be reported.

DATA REQUEST JUSTIFICATION

Provide adequate justifications for the quantity of the data, the years and the variables being requested. Have you requested no more than the minimum necessary data to perform the research?

CDSS, CSAC, CDE, UCOP, CCCCO, CSUCO, and UC CCP will provide data on safety net program applicants and recipients, FAFSA applicants, students, and individuals with credit history. This combination will allow researchers to examine the eligibility for, usage of, and longer-term impacts of financial aid and safety net benefits, by students enrolled in K-12 and higher education. All data will come from existing administrative and survey databases routinely collected by the partner organizations.

Data from FAFSAs held by CSAC will include de-identified student-level data on financial aid applications and offers. This will be used to construct measures of student eligibility for safety net programs, financial aid and tax credits, as programs have criteria including income limits and participation in grants, such as Pell and Cal Grants.

Data from CDSS will include applicants to, and participants in, CalFresh and CalWORKs programs. This will allow researchers to compare our eligibility estimates with actual participation of students in safety net programs.

Data from UC, CSUCO, CCCCO on enrollment, status regarding financial aid and in certain employability programs, will also contribute to eligibility estimates and also allow researchers to explore the impacts of safety net programs on student success and educational outcomes. Data from CDE will allow us to understand the impact of participation in safety net programs during K-12 on educational outcomes, and will also allow us to examine continuity in participation between K-12 and postsecondary.

Researchers will receive up to 15 years of historical administrative data from each partner organization. This will allow researchers to analyze some de-identified records for students from FAFSA applications and through college to degree attainment, to provide a longitudinal assessment of the impact of safety net participation on student success measures such as graduation. It will also allow researchers to measure changes in eligibility and take-up through changing economic conditions.

The UC CCP dataset will provide anonymized information on household credit, debt, income, and mobility synthesized into consumers' credit histories - this data is originally gathered by one of the three nationwide consumer credit bureaus from banks, credit card issuers and public records, and aggregated into a credit score. It has been purchased from the credit bureau by CPL. The panel holds approximately 60 million consumers' record from 2004 and continues quarterly through 2020, however only data from 2010 to 2020 (and eventually to 2025) will be linked for this study.

Data from Compton College will allow us to understand the efficacy of this particular text-based outreach strategies on CalFresh take-up.

LIMITATIONS TO DATA ACCESS

Indicate if access to data is limited only to those with a need to know for purposes of implementing or evaluating the research.

Access to data will be limited only to those with a need-to-know for purposes of implementing or evaluating the research. CPL's server is configured to allow only authorized researchers access to the specific data used for each project. As described above, CPL's IT Manager controls user access permissions. Prior to granting a user access to data, the IT Manager and Director of Data Partnerships & Privacy document and ensure that the user has completed necessary trainings and pre-requisites to accessing data

PROTECTION AGAINST SMALL CELL SIZES AND ASSOCIATED PROBLEMS

Describe appropriate and sufficient methods to protect the identity of individual subjects when small cells or small numbers and/or data linkage to another data set are involved in the research project.

All linkages and analysis will take place on CPL's secure data hub, which is behind significant physical and cybersecurity firewalls (described above and below) and is encrypted at rest. All results proposed to be removed from the server will be reviewed for disclosure risk. Only aggregate statistics will be taken off of the server and used in project outputs. Statistics for small cells (representing fewer than 10 individuals) will be suppressed.

LINKAGES

Will the data set be linked with any other data sets?

Yes

Identify all data sets and each of the variables to be linked, with a brief description of each variable and justification for each linkage. If there is an extensive list, you may attach that list in the next question and indicate such here.

The study will link data provided to the researchers by CDSS, CSAC, CDE, UCOP, CSUCO, and CCCCO, on safety net program applicants and recipients, FAFSA applicants and college students. It will also link data from Compton College on the treatment status of students in a text-based outreach intervention. This will entail matching de-identified records with the same variables captured by each organization.

CDSS will provide de-identified application and enrollment data on CalFresh, and enrollment data on CalWORKs. These data include income, household composition, demographic information (such as gender, ethnicity and zip code) and applications, enrollments and allotments. CDSS will also provide de-identified, individual level data from the Medi-Cal Eligibility Data System (MEDS) files.

CSAC data will include de-identified data from students' financial aid applications which will allow us to measure students' family structures and financial situations.

UCOP, CSUCO, and CCCCO will provide data regarding student demographics, student enrollment, achievement and attainment information, and eligibility and status regarding financial aid, CalWORKs, Extended Opportunity Programs and Services (EOPS) and the Cooperative Agencies Resources for Education (CARE) program. UC will provide data on University of California college students, CSUCO will provide data on California State University students, and CCCCO will provide data on California Community College students. UC will also provide survey response data from its Undergraduate Experience survey, and CCCCO will additionally provide the treatment status of students who were randomly assigned to receive outreach, and whether or not they participated in application assistance.

CDE will provide data regarding student demographics, student enrollment, standardized test scores, high school course-taking, between-school mobility, and attendance rates.

UC CCP data will provide information on household credit, debt, income, and mobility synthesized into consumers' credit histories.

Compton College will provide the treatment status and student ID of students from the "Evaluation of Pilot CalFresh Nudges at Compton College" led by the HOPE Center at Temple University.

With the exception of Compton College, the original datasets at each agency contain PII (names, addresses, and social security numbers). A de-identification process will be implemented by each organization that owns the data, prior to it being shared with the researchers. Each agency will apply the cryptographic hash algorithm SHA-256, specified in the Federal Information Processing Standards: FIPS 180-4, Secure Hash Standard, to the PII that it itself holds. This will turn PII into meaningless strings of characters, and researchers will only be provided with data that have the hashed IDs in place of the PII. This process will enable the data to be meaningful

when linked, but not be re-identifiable by CPL in any way. The hashing procedure is irreversible, so CPL and its staff will not receive nor be able to access any PII.

The match of de-identified CDSS, CSAC, CDE, UCOP, CSUCO, CCCCO and UC CCP datasets will be completed by CPL staff, in a highly secure computing environment.

The analytical datasets will contain un-hashed values of the zip code and county of residence, to permit geographic analyses. The UC CCP dataset will also contain un-hashed census block information. Last, as discussed elsewhere, the CDSS dataset will initially include a file containing unhashed DOB, but immediately upon receipt, this file will be carefully segregated from the data made available to the research team to prevent possible linking of the hashed PII to the underlying information.

No other un-encrypted (or un-encryptable) PII will be included in the data shared with researchers. The resulting dataset will nonetheless be treated as identified for information security purposes.

Attach a copy of the document detailing all data sets and each of the variables to be linked. If you provided this information in the answer to the above question, skip this question.
No answer provided.

Will a third party be used for data linkage?
No

DESTRUCTION OF PID VERIFICATION

Indicate that you will provide CPHS with a letter certifying that PID has been destroyed and/or returned to the data source once research is concluded.

Yes

DATA SECURITY LETTER

Upload a certification/statement from the Chief Information Officer, Privacy Officer, Security Officer or equivalent position of the researcher's institution that CPHS Data Security Standards are met.

- *Data security letters cannot be signed by the Principal Investigator or Responsible Official.*
- *The data security letter must be on your institution's letterhead.*
- *Example of data security letter*

Signed_CPHS Data Security Letter - CPL Jesse Rothstein - June 2020 - CISO Signed.pdf	Data Security Letter

Physical Safeguards

DATA PROTECTION

Indicate that research records and physical samples will be protected through the use of locked cabinets and locked rooms; PID in paper form will not be left unattended unless locked in a file cabinet, file room, desk, or office.

Yes

DATA DESTRUCTION

Will data/samples will be destroyed or returned as soon as it is no longer needed for the research project.

Yes

RETAINED DATA

Will the retained data/samples have personal identifiers or be de-identified?

data will be de-identified

Explain what identifiers will be removed and how.
The individual identifiers (name, DOB, SSN, address) will be removed before data are provided to the researchers, who will not have access to the key linking the coded data file to this information (with one exception at time of initial data intake, discussed below). Each agency will use a hashing process to encrypt these variables before transferring data to researchers. This will use the cryptographic hash algorithm SHA-256, specified in the Federal Information Processing Standards: FIPS 180-4, Secure Hash Standard.

With agency permission, researchers will retain a master dataset of de-identified individual-level data, without name, date of birth, or SSN (but with zip code, county, and census block) in order to conduct follow-up analyses or replication as may be required for publication. Any retained data will be encrypted for storage. Census block will only be available for individuals in the UC CCP dataset.

One file provided to researchers, from CDSS, will contain un-encrypted DOB, for use in other projects covered by other protocols. This will be removed immediately upon data receipt and carefully segregated to ensure that researchers on this project do not have access. Specifically, one member of the research team, Karla Palos, will receive the transferred file from CDSS. She will separate the transferred file into two, one containing the unhashed DOB but not the hashed PII, and the other containing the hashed PII but not the unhashed DOB. The file containing the unhashed DOB will then be locked by our IT manager and members of this project's research team, including Karla, will not be given access except insofar as that is provided by other approved IRB protocols (which will not use the hashed values). The file containing hashed PII will then be transferred to a separate analytical environment where work for this project will be conducted.

DESTRUCTION METHODS

Describe how you will ensure the PID in paper form is disposed of through confidential means, such as cross cut shredding or pulverizing.

Data will not be stored in paper form. All data will be stored in the California Policy Lab Data Hub which consists of private, secured virtual servers designed for University of California Berkeley and Los Angeles researchers and affiliates to securely store, access, and analyze restricted data in a remote session without storing data on local computers.

FAXING

Describe how you will ensure that faxes with PID are not left unattended and fax machines are in secure areas.

Not applicable, data will not be received by fax.

MAILING

Indicate whether mailings of PID are sealed and secured from inappropriate viewing; and whether mailings of 500 or more individually identifiable records of PID in a single package, and all mailings of PID to vendors/contractors/co-researchers, are sent using a tracked mailing method, which includes verification of delivery and receipt, such as UPS, U.S. Express Mail, or Federal Express, or by bonded courier.

Not applicable, data will not be received by mail.

ELECTRONIC STORAGE

State whether PID in paper or electronic form, e.g., stored on laptop computers and portable electronic storage media (e.g., USB drives and CDs), will ever be left unattended in cars or other unsecured locations.

Not applicable. Data will only be stored on CPL's secure data servers and therefore will never be left unattended.

PHYSICAL STORAGE

Describe whether facilities, which store PID in paper or electronic form, have controlled access procedures, and 24 hour guard or monitored alarm service.

CPL's data hub is in a temperature-controlled server room located behind a locked door. The lock requires an identification card as well as a personal pin code and each access is logged. The data center and the door have 24-hour armed guard response. The data center has contingency protocols in place in case of fire, power outage, earthquake, or other emergencies.

SERVER SECURITY

Provide a description of whether all servers containing unencrypted PID are housed in a secure room with controlled access procedures.

The California Policy Lab (CPL) data analysis servers are operated under professional security standards, with the awareness that security is multi-layered and must be managed as an on-going process. The physical servers are housed in University data centers with controlled physical access, security cameras, and 24/7 University police response.

Access to the servers is protected by strong authentication requirements, including 2-factor authentication. A Virtual Private Network (VPN) connection is used for end-to-end encryption for all remote connections to the server even if connecting from a local network on campus. After connecting to the VPN, users connect to the server via secure shell or Remote Desktop Protocol – each providing a second level of encryption. Strong passwords are required for both the VPN and server connection, in addition 2-factor authentication is required for server login. All network traffic is encrypted between the user's computer and the CPL data servers. All services and network access controls operate on the "minimum services" and "minimum permissions" principles.

The servers are protected by a firewall that restricts traffic and allows connections only from machines connected directly to a VPN, which provides a password authenticated, secure connection. The University of California's campus network is constantly monitored by computer security specialists. Data stored on the servers is encrypted at rest. Access to outside networks (i.e. the Internet) is restricted and users are unable to copy/paste or connect removable media such as USB drives.

STORING IDENTIFIERS

Indicate whether identifiers will be stored separately from analysis data.

The data will be de-identified before being provided to the researchers, who will not have access to names, social security numbers, or addresses, nor will the researchers have access to the key linking the coded data file to this information.

Census block, zip code, and county, which will not be de-identified, will not be stored separately from other data because all other data will be de-identified through an irreversible hashing process. These un-hashed variables (census block, zip code, and county) are also necessary for analysis to address key research questions in the study. Census block will only be available in the UC CCP dataset.

One identifier, date of birth, will be included in the initial data transfer from CDSS for use in other projects. Upon receipt, research team member Huizhi Gong will immediately separate the received data into two files, one with the encrypted DOB and one without. The first file, with the encrypted DOB, will be transferred to a folder with controlled access, and all subsequent research activities for this project will use this file. The second file will be moved to a secure, permission-controlled folder on the server in CPL's secure Data Hub, with permissions set to prevent unnecessarily ongoing access by any member of this project's research team (including Huizhi).

All linkages and analysis will take place on CPL's secure data hub, where all data will be stored and which is behind significant physical and cybersecurity firewalls and is encrypted at rest. All results proposed to be removed from the server will be reviewed for disclosure risk. Only aggregate statistics will be taken off of the server and used in project outputs. Statistics for small cells (representing fewer than 10 individuals) will be suppressed.

All researchers have been trained on the treatment of sensitive administrative data and the risks of re-identification. All researchers sign agreements to hold the data confidential and to never attempt to identify or contact any individual in the data. The secure system on which the analysis is conducted does not allow for downloading of any of the data.

DISK STORAGE

State whether all disks with PID will be destroyed.

When hard drives are decommissioned, they will be wiped clean with disk-wiping software. Even before drives are decommissioned, CPL will securely wipe and overwrite PID from drives when those folders are deleted such that it could never be recovered.

Electronic Safeguard

COMPUTER ACCESS OVERVIEW

State whether all computer access will be protected through the use of encryption, passwords, and other protections.

Yes. Users only have access to the data via virtual private network and remote desktop. Each user has a unique ID and password. There is end-to-end encryption in the VPN. Passwords must have letters, numbers, and special characters. The remote connections time out after 10 minutes.

A separate virtual machine server is created for each project. Only those users who are approved to access the project data are given a login account. Access Control Lists (ACLs) are in place for data folders giving users only the access required for their needed analysis. Logging is enabled showing user connectivity success and failures (bad password attempts). Automated timeout on Windows and Linux servers is enabled which locks the desktop after 10 minutes of inactivity requiring re-entering of credentials and re-authentication with 2-factor device. Secure File Transfer Protocol (SFTP) is used to upload data files to the servers.

FIPS 140-2 COMPLIANCE: WORKSTATIONS

Indicate whether all workstations that contain PID have full disc encryption that uses FIPS 140-2 compliant software. If not, explain why not and what encryption will be used.

PID will not be stored on any workstations, only CPL's secure servers. At rest, all data is encrypted using FIPS 140-2 compliant software. Connections to CPL's secure servers are encrypted.

FIPS 140-2 COMPLIANCE: LAPTOPS

Indicate if all laptops that contain PID have full disc encryption that uses FIPS 140-2 compliant software. If not, explain why not and what encryption will be used.

PID will not be stored on any laptops.

FIPS 140-2 COMPLIANCE: REMOVABLE MEDIA DEVICES

Indicate if PID on removable media devices (e.g. USB thumb drives, CD/DVD, smartphones, backup recordings) are encrypted with software that is FIPS 140-2 compliant.

PID will not be stored on removable media.

SECURITY PATCHES

Indicate if all workstations, laptops and other systems that process and/or store PID have security patches applied in a reasonable time frame.

PID will only be stored on CPL's secure data hub. All patches are identified and patched immediately for security patches, and otherwise monthly.

PASSWORD CONTROLS

Indicate if sufficiently strong password controls are in place to protect PID stored on workstations, laptops, servers, and removable media.

Yes. All devices accessing the CPL server through Remote Desktop Connection will be configured according to UC Berkeley's Minimum Security Standards for Networked Devices, which includes a strong password requirement. This requirement entails that passwords contain eight characters or more and at least two of the following three character classes: alphabetic (e.g. az, A-Z); numeric (i.e. 0-9); and punctuation and other characters (e.g., !@#$%^&*()_+|~=\`{} []:";'<>?,./).

ELECTRONIC SECURITY CONTROLS

Indicate if sufficient system security controls are in place for automatic screen timeout, automated audit trails, intrusion detection, anti-virus, and periodic system security/log reviews.

Yes. All devices accessing the CPL secure server through Remote Desktop Connection will be configured according to UC Berkeley policy (Minimum Security Standards for Electronic Information, and the Minimum Security Standards for Network Devices). User access is logged, and updated anti-virus/anti-malware software is installed on all servers and connecting workstations. In addition, connections through the Remote Desktop Connection will time out after ten minutes.

FIPS 140-2 COMPLIANCE: ELECTRONIC TRANSMISSION

Explain whether all transmissions of electronic PID outside the secure internal network (e.g., emails, website access, and file transfer) are encrypted using software which is compliant with FIPS 140-2.

There is no access to the internet available from CPL's secure servers, so no access to emails or websites is available. There is a one-way file transfer protocol available to the server, so data cannot be downloaded, only uploaded. Connections to the CPL secure server are through Remote Desktop Connection which is an encrypted protocol.

INTERNET ACCESSIBILITY

Note if PID in an electronic form will be accessible to the internet.

PID data will not be accessible to the Internet.

DISPOSING OF PID

When disposing of electronic PID, indicate whether sufficiently secure wiping, degaussing, or physical destruction will be used.

When hard drives are decommissioned, they will be wiped clean with disk-wiping software. Even before drives are decommissioned, CPL will securely wipe and overwrite PID from drives when those folders are deleted such that it could never be recovered.

Conflict of Interest Information

CONFLICT OF INTEREST (COI) INSTRUCTIONS

A COI is defined as any financial or other relationships of the researcher(s) or the institution that could be perceived as affecting the objective conduct of the research, including the interpretation and publication of the findings. Researchers must disclose any COI, including perceived COI.

Financial relationships to be disclosed include but are not limited to the following:

- **Present or anticipated ownership of stock, stock options, or other financial obligations of the source of funding.**
- **Receipt or expectation of payment of any sort in connection with papers, symposia, consulting, editing, etc. from the source of funding.**
- **The sale or licensing or anticipated sale or licensing of medical or other products or intellectual property, such as patents, copyrights, or trade secrets to the source of funding or other entities.**
- **Any past, present or anticipated receipt of money or other valuable consideration from the source of research funding by the researcher(s), the family of the researcher(s), the research institution, or by an institution in which the researcher(s) or the family of the researcher(s) has an interest as owner, creditor, or officer.**

DISCLOSURES

Does any member of the study team, members' spouses, or members' dependent children have any significant financial interests related to the work to be conducted as part of the above-referenced project?

No

Informed Consent Waiver

INFORMED CONSENT WAIVER

Are you requesting a waiver or alteration of informed consent?

Yes

Provide a rationale as to why the research could not practicably be conducted without the waiver or alteration.
CPHS procedures provide for two circumstances in which informed consent requirements can be waived, labeled "Criteria A" and "Criteria B."

Criteria A applies here because:
(1) The project is to be conducted by state government officials and is designed to study, evaluate, or otherwise examine procedures for obtaining benefits or services under an important public benefit program; and
(2) The research could not practicably be carried out without the waiver or alteration, for the following reasons:
a) the study requires no interaction with human subjects and the data collected does not include contact information for these individuals, such as phone numbers or email addresses, which would be necessary to obtain their consent in the absence of any planned interaction;
b) it is not practicable to obtain informed consent from each individual in up to 15 years of historical administrative data;
c) analysis is being conducted to assess eligibility for a program the individual may not be participating in and therefore may not be aware of.

Provide a detailed account of the plans and measures that will be in place to protect the rights and welfare of the subjects.
The research presents no more than minimal risk of harm to subjects and involves only procedures which occur routinely outside of the research context — the collection and tabulation of administrative data. There will be no human subject involvement beyond the analysis of the data already collected routinely by each organization to administer respective services. It will therefore require no further effort and impose no discomfort on participants, and will require no actions beyond those they have already taken.

Participants' data will be de-identified before being provided to the researchers, who will not have access to names, social security numbers, addresses, or other personally identifying information (PII), nor will the researchers have access to the key linking the coded data file to the PII. A hashed merge linkage process will allow us to link data from each of the participating agencies without receiving PII. Each agency hashes the PII that it itself holds, turning it into meaningless strings of characters, and only transfers data to CPL that have the hashed IDs in place of the PII.

Information will not be published that could possibly be used to identify an individual subject. All reports released outside of CPL will consist only of tabulations and summaries of the data at high levels of aggregation. None will include information that would permit re-identification of subjects, either separately or in combination with other data.

After the analysis, CPL will provide summary information to CDSS, CSAC, UCOP, CSUCO, CDE and CCCCO. All end products (such as an academic article, policy brief and partner report) will report only aggregate statistics across hundreds or thousands of individuals. No statistics for cells smaller than 10 individuals will be reported.

HIPAA Determination

HIPAA INSTRUCTIONS

To determine if this project is covered by HIPAA, answer the following questions.

COVERED ENTITY

Will health information be obtained from a covered entity, known as a clearinghouse, such as Blue Cross, that processes or facilitates processing health data from another entity, including but not limited to state databases?

No

HEALTHCARE PROVISIONS

Will the study involve the provision of healthcare by a covered entity, such as the UCD Medical Center?

No

OTHER HIPAA CRITERIA

Will the study involve other HIPAA criteria not listed above?

No

Amendment Changes

List the pages and questions that have been changed.

Page 1: Clearly summarize and justify your proposed changes to the protocol in layman's terms for all selections made above (Required)

Page 4: STUDY PROCEDURES
Describe in detail all procedures for this research. Do not attach grant applications or similar documents. Information in this application must be sufficient to fully explain the procedures without such documents

DATABASE DETAILS
(This section was simply corrected to include data from CSU, which was approved from a prior amendment.)
List the database(s) to be used and the time period(s) being requested. This may include requests for future data that is not available at this time.

Page 6: BENEFITS
Describe the benefits, if any, to the subjects or to society that will be realized as a result of this project. Discuss the benefits that may accrue directly to the subjects as well as to society. If there is no direct benefit anticipated for the subjects, state that clearly.

Page 7: LINKAGES
Identify all data sets and each of the variables to be linked, with a brief description of each variable and justification for each linkage. If there is an extensive list, you may attach that list in the next question and indicate such here. (Required)

PAGE 8: STORING IDENTIFIERS
(This section was simply corrected to update the staff member responsible for removing the DOB we receive from CDSS from this project.)
Indicate whether identifiers will be stored separately from analysis data.

Cover Letter and PI Signature for PI Submission

BUDGET

Does this project have a budget?

Yes

Attach a copy of your project budget here

File	Type
CEJA Rounds 1& 2 - Consolidated budget for IRB.pdf	Project Budget
CFF Budget for IRB.pdf	Project Budget
IES consolidated budget for IRB.pdf	Project Budget
Student Supports Spencer Budget.pdf	Project Budget
USDA Budget.pdf	Project Budget

COVER LETTER

Attach a copy of your project cover letter.

Cover letter must have the requesting institution's letterhead.

PI Cover Letter - Student Supports.pdf   Cover Letter

In order for the PI to review and sign this form, you will need to click "Next" and on the next page, click "Submit." At that point the PI will receive notification that will need to review the application and if they request changes, they will return the form to you and you will receive an email notification.

Calculated Field for agency plus data set *(Internal)*

California Department of Social Services: Medi-Cal Eligibility Data System

PI Signature for Coordination Submission (Amend)
- Submitted 10/13/2025 9:01 PM ET by Jesse Rothstein, PhD
PI Review

Please click "Next" and "Submit" in order to submit this application, regardless of whether or not it is ready for review. If you indicated it is ready for review, the amendment will be submitted to the CPHS Office, and if not, it will be returned to the individual who completed the form for changes.

Is this application ready to be reviewed by the IRB? If not, choose no to have the application sent back to the coordinator for revisions.

Yes

To sign this form, enter your IRBManager password. By signing this form, you are indicating that the information within this application is accurate and reflects the proposed research and that you attest to the conflict of interest disclosures for all study team members.

Signed Monday, October 13, 2025 9:01:07 PM ET by Jesse Rothstein, PhD

Notify IRB for Pre-Screening
- Submitted 10/14/2025 1:50 PM ET by Sussan Atifeh
Internal IRB Screening

The questions on this page will be blank when an amended copy is submitted. If the form is returned during the amendment review, the questions on this page will appear as answered previously during the amendment review (responses from the initial review will not appear)

Is this study ready to be reviewed by the CPHS panel?

Yes

Choose the IRB committee to review this study (this defaults to CPHS)

CPHS

Level of Review Determination (once the level of review is assigned for this project, do not change this answer unless the reviewer/committee has decided that the study requires a different level of review)

Expedited

Please provide a rationale for your level of review preliminary determination
One of this project's core research questions, RQ4, is "How successful have efforts (undertaken by CSAC, the higher education segments, CDSS, or others) designed to increase take-up of safety net programs, been in improving program take-up, improving student academic success, and lowering rates of financial distress, especially during COVID?"

One such effort that we now wish to evaluate is providing students with CalFresh application assistance on their college campus, via their Offices of Student Basic Needs. This is a common practice across California campuses. We would like to evaluate this practice using random assignment, emailing students in the treatment group with a link to sign up for an appointment. To encourage students to attend these appointments (and be better-positioned to identify the impact of this practice, if there is one), we will to offer $20-$25 gift card incentives, administered by the Offices of Student Basic Needs. We are currently seeking funding from philanthropy to cover the cost of these incentives.

Choose the primary expedited reviewer for this project
Larry Dickey, MD, MPH, MSW

Choose 'expedited'.
Expedited Review

Choose the staff member who should be notified when the reviews are completed (normally this will be the person processing the review, but if you will be OOO, you are able to chose someone else):
Nicholas Zadrozna

Assign to Cycle

October

Assign to cycle year
2025

Under Expedited Review
- Submitted 10/15/2025 7:36 PM ET by The System
Expedited Review

Project Number *(Internal)*
2020-151-UC Berkeley

If you wish to make comments on the application for the researcher, use the 'add note' feature on each question (be certain to unmark the internal only box and do not mark changes required). To navigate the application, you can either use the 'previous' button at the bottom of the page or from the drop down at the top of this page choose 'view previous stages'.

Complete your review using the link in the review email you received in order to record your review determination.

review list output Note: The reviewer's determination will not appear on this table until the reviewer has complete the review form.

Type	Reviewer	Outcome	Assigned	Due	Complete
Expedited Review	Larry Dickey, MD, MPH, MSW	Revisions Required	10/14/2025	10/24/2025	10/15/2025

I believe this amendment should be reviewed by the full committee at the next meeting. In the e-mail to students it is stated: "We've identified you as someone who may be eligible for CalFresh." Can you provide information to the students how they have been identified? Was it from their financial aid applications? Can you provide a copy of the preapplication check list that will be provided to students? Is there any form of informed consent provided to the potential participants? Perhaps an informational sheet could be provided to the students with the check list and you could apply for waiver of informed consent? Technically it seems this may need to come to the full committee, but let me look at the proposed text for the e-mails and changes in the procedures section.

Reviewer feedback for amendment (used to pull into email)

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Post Exempt/Expedited Processing (Amendment)

Post Exempt/Expedited Amendment Processing