



*The World's Largest Open Access Agricultural & Applied Economics Digital Library*

**This document is discoverable and free to researchers across the globe due to the work of AgEcon Search.**

**Help ensure our sustainability.**

**Give to AgEcon Search**

AgEcon Search

<http://ageconsearch.umn.edu>

[aesearch@umn.edu](mailto:aesearch@umn.edu)

*Papers downloaded from **AgEcon Search** may be used for non-commercial purposes and personal study only. No other use, including posting to another Internet site, is permitted without permission from the copyright owner (not AgEcon Search), or as allowed under the provisions of Fair Use, U.S. Copyright Act, Title 17 U.S.C.*

*No endorsement of AgEcon Search or its fundraising activities by the author(s) of the following work or their employer(s) is intended or implied.*

# Impact of 2002-03 Farm Bill Restorations on Food Stamp Use by Legal Immigrants

Contractor and Cooperator Report No. 40  
April 2008

**By Everett J. Henderson, Randy Capps, and Kenneth Finegold,  
Urban Institute**

## **Abstract**

This study used 1999-2004 Current Population Survey data in conjunction with the Urban Institute's Transfer Income Model (TRIM3) to quantify the impact of the 2002 Farm Bill's eligibility restorations. About half the estimated impact came from increases in newly eligible families, while the rest came from increases in eligible family members within already-eligible families (usually within families with citizen children). By 2004, the restorations had extended eligibility to roughly 1 million legal immigrants and 148,000 additional families. The extension in eligibility reached around two-thirds of those made ineligible by the 1996 welfare reform law rules and not covered by the 1998 restorations. The estimated participation gain over the period was 780,000 individuals and 139,000 legal immigrant families. The restorations took place in an era of large increases in food stamp caseloads overall; even so, the share of families containing legal immigrants increased substantially.

**This study was conducted by the Urban Institute under a cooperative research contract with USDA's Economic Research Service (ERS) Food and Nutrition Assistance Research Program (FANRP): contract number 43-3AEM-3-80115 (ERS project representative: Constance Newman). This is the third and final report submitted under this agreement. The authors take full responsibility for the accuracy of material presented herein. The data underlying the report are derived in part from the Transfer Income Model, Version 3 (TRIM3) and associated databases. TRIM3 requires users to input assumptions and/or interpretations about economic behavior and the rules governing Federal programs. The views expressed are those of the authors and not necessarily those of the Urban Institute, its trustees, ERS, or USDA.**

## **ACKNOWLEDGMENTS**

The authors would like to thank Jeffrey S. Passel of the Pew Hispanic Center and Laura Wheaton of the Urban Institute for their technical assistance in developing the methods for this project and the U.S. Department of Health and Human Services, Assistant Secretary for Policy Evaluation, for financial support and technical assistance for developing the TRIM3 model. Several reviewers from the U.S. Department of Agriculture and U.S. Department of Health and Human Services provided insightful comments and helpful technical edits.

## **CONTENTS**

<b>Summary .....</b>	<b>1</b>
What Is the Issue? .....	1
Major Findings.....	2
How Was the Study Conducted? .....	4
<b>Study Background .....</b>	<b>5</b>
Changes in Legal Immigrant Eligibility for the Food Stamp Program.....	6
Focus on Mixed Citizenship and Mixed-Eligible Units .....	7
Recent Increases in Food Stamp Caseloads.....	8
<b>Methods .....</b>	<b>9</b>
Data and Sample Used for Analysis .....	9
Classifying Units by Citizenship and Legal Status .....	10
Defining Mixed-Eligible Units .....	11
Baseline Simulation .....	12
Alternative Simulations .....	13
Analysis of Trends in FSP Eligibility and Participation.....	13
Decomposition of Trends in Participation Rates .....	14
Regression Analysis of Food Stamp Participation.....	14
<b>Findings for 2003 and 2004.....</b>	<b>14</b>
Demographics of Low-Income, FSP-Eligible and Participating Units in 2004.....	15
Baseline Simulation of FSP Eligibility and Participation.....	17
Alternative Simulation: PRWORA Legal Immigrant Restrictions Left in Place .....	22
Alternative Simulation: All Legal Immigrant Restrictions Removed .....	27
<b>Trends between 1999–2000 and 2003–04 .....</b>	<b>33</b>
Decomposition of FSP Participation Trends.....	36
<b>Regression Analysis of Food Stamp Participation among Eligible Units .....</b>	<b>37</b>
Regression Analysis of Food Stamp Participation for 2003–04 .....	37
Regression Analysis Results for 1999–2000 versus 2003–04 .....	42
<b>Conclusion .....</b>	<b>46</b>
<b>References.....</b>	<b>50</b>
<b>Appendix: Detailed Methodology .....</b>	<b>75</b>
Data Sources .....	75
Definitions and Classification of Data.....	78
Eligibility Simulations .....	85
Decomposition of Trends in Participation Rates .....	88
Regression Analysis of Food Stamp Participation.....	89

## **FIGURES AND TABLES**

Figure 1: Food Stamp Eligibility and Receipt Flowchart .....	12
Figure 2: Citizenship and Legal Status of Low-Income Food Stamp–Eligible Units, 2004 .....	16
Figure 3: Citizenship and Legal Status of Low-Income Food Stamp–Eligible Units with Children, 2004.....	17
Figure 4: Participation Rates for Low-Income Food Stamp–Eligible Units, 2003.....	19
Figure 5: Participation Rates for Low-Income Food Stamp–Eligible Units, 2004.....	21
Table 1: Number of Units (Unweighted) by Income Level, Unit Legal Status, and Presence of Children, March 2004–05 CPS (Calendar Years 2003–04).....	52
Table 2: Low-Income Units Eligible for and Receiving Food Stamps, by Unit Legal Status and Presence of Children, Baseline Simulation, March 2004 CPS (Calendar Year 2003) .....	53
Table 3: Low-Income Units Eligible for and Receiving Food Stamps, by Unit Legal Status and Presence of Children, All-LPRs-Eligible Simulation, March 2004 CPS (Calendar Year 2003) .....	54
Table 4: Simulation of Low-Income Units Eligibility for and Receipt of Food Stamps, by Unit Legal Status and Presence of Children with No Legal Immigrant Restrictions Removed, March 2004 CPS (Calendar Year 2003) .....	55
Table 5: Simulated Differences in Low-Income Units Eligible for and Receiving Food Stamps between Baseline and No-Restoration Scenarios, by Unit Legal Status and Presence of Children, March 2004 CPS (Calendar Year 2003) .....	56
Table 6: Simulated Differences in Low-Income Units Eligible for and Receiving Food Stamps between All-LPRs-Eligible and No-Restoration Scenarios, by Unit Legal Status and Presence of Children, March 2004 CPS (Calendar Year 2003).....	57
Table 7: Low-Income Units Eligible for and Receiving Food Stamps, by Unit Legal Status and Presence of Children, Baseline Simulation, March 2005 CPS (Calendar Year 2004) .....	58
Table 8: Low-Income Units Eligible for and Receiving Food Stamps, by Unit Legal Status and Presence of Children, All-LPRs-Eligible Simulation, March 2005 CPS (Calendar Year 2004) .....	59
Table 9: Simulation of Low-Income Units Eligibility for and Receipt of Food Stamps, by Unit Legal Status and Presence of Children with No Legal Immigrant Restrictions Removed, March 2005 CPS (Calendar Year 2004) .....	60
Table 10: Simulated Differences in Low-Income Units Eligible for and Receiving Food Stamps between Baseline and No-Restoration Simulations, by Unit Legal Status and Presence of Children, March 2005 CPS (Calendar Year 2004) .....	61
Table 11: Simulated Differences in Low-Income Units Eligible for and Receiving Food Stamps between All-LPRs-Eligible and No-Restoration Simulations, by Unit Legal Status and Presence of Children, March 2005 CPS (Calendar Year 2004).....	62

Table 12: Low-Income Units Eligible for and Receiving Food Stamps, by Unit Legal Status and Presence of Children, Baseline Simulation, Average of March 2004–05 CPS (Calendar Years 2003–04) .....	63
Table 13: Low-Income Units Eligible for and Receiving Food Stamps, by Unit Legal Status and Presence of Children, Baseline Simulation, Average of March 2000–01 CPS (Calendar Years 1999–2000) .....	64
Table 14: Food Stamp Unit Eligibility Transitions, 2003 (Baseline versus No Restoration).....	65
Table 15: Food Stamp Unit Eligibility Transitions, 2003 (Full versus No Restoration) .....	66
Table 16: Food Stamp Unit Eligibility Transitions, 2004 (Baseline versus No Restoration)Table 17: Food Stamp Unit Eligibility Transitions, 2004 (Full versus No Restoration) .....	67
Table 17: Food Stamp Unit Eligibility Transitions, 2004 (Full versus No Restoration) .....	68
Table 18: Annual Median Benefit Difference Figures, 2003, 2004 Universe: Low-Income, Food Stamp–Eligible Units .....	69
Table 19: Trends in Mixed Eligibility, Citizenship, and Participation, 1999–2004 Universe: Low-Income Eligible Units with Children .....	70
Table 20: Trends in Mixed Eligibility, Citizenship, and Participation, 1999–2000 to 2003–04 Universe: Low-Income Eligible Units with Children .....	71
Table 21: Logistic Regression Results for Low-Income, Food Stamp–Eligible Units, March 2004 and 2005 CPS (Calendar Years 2003 and 2004).....	72
Table 22: Logistic Regression Results for Low-Income, Food Stamp–Eligible Units, March CPS 1999–2000 to 2003–04 .....	73

# **THE IMPACT OF THE 2002-03 FARM BILL RESTORATIONS ON FOOD STAMP USE BY LEGAL IMMIGRANTS**

## **Summary**

This report quantifies the impact of the 2002 Farm Bill’s eligibility restorations on food stamps eligibility and receipt by noncitizen legal immigrants. It finds that the Farm Bill restorations made many legal immigrant families newly eligible for food stamps, yet the biggest impact of the bill was on families that had at least one eligible member before the restorations (usually a U.S. citizen child) but other members (usually noncitizen parents) that later became eligible. For these families, median annual benefits rose by several hundred dollars because of the restorations, and in turn higher benefits gave these families greater incentive to participate. The analysis was done using six years of national survey data in conjunction with computer simulations of various policy changes.

## ***What Is the Issue?***

The 2002 Farm Security and Rural Investment Act—also known as the “Farm Bill”—restored food stamp benefits to legal permanent residents (LPRs) who were made ineligible by the 1996 welfare reform law and met the following criteria:

- were disabled, regardless of entry date (effective October 2002);
- had been in the United States for five years or more (effective April 2003); and
- were children, age 18 and under, regardless of entry date (effective October 2003).

The reauthorization of the Farm Bill is still being considered in Congress; the House passed a version of the bill in July 2007 and the Senate is currently debating its own version. Neither version contains any changes to the current provisions regarding noncitizen eligibility for food stamps.

## ***Major Findings***

The Farm Bill restorations made a substantial number of LPR families newly eligible for food stamps—in other words, no one in the family was eligible before the restorations, but at least one person was eligible afterwards. The biggest impact of the bill, however, was on families that had at least one eligible member before the restorations but subsequently had one or more additional family members become eligible for the program. In most cases, these were families with LPR adults and U.S.-born-citizen children. When more family members became eligible, the benefit levels went up in most cases, because the benefit level is based in part on the number of eligible members in the family. Some more of these families participated as the higher benefit level gave them greater incentive to do so. At the same time, however, a nontrivial number of legal immigrant families actually lost eligibility for food stamps or had benefits reduced because of the restorations, because food stamp rules only count part of the income of ineligible members, and more of these members' income became countable when they were no longer excluded by the restrictions based on citizenship.

In 2004, the year following their full implementation, the Farm Bill provisions restored eligibility to an estimated 148,000 family units that included LPRs; about one-third of these families had children. The Farm Bill restored eligibility to about two-thirds as many families as would have been affected by a full restoration to all legal immigrants regardless of age or length of U.S. residency.

The Farm Bill provisions affected participation as well as eligibility. We estimate that the changes in noncitizen eligibility resulted in about 139,000 more LPR families actually receiving food stamps. About half of these families had children. Again this was about two-thirds of the impact of a full restoration.



At the individual level, in 2004, the Farm Bill restored eligibility to a total of about 1 million LPRs, about two-thirds of the total (1.5 million) who would be eligible under a full restoration to all legal immigrants. About half (528,000) of these individuals were in units that became newly eligible, while 506,000 were in units that transitioned from mixed eligibility (some members eligible and others ineligible) to full eligibility (all members eligible). Another 125,000 resided in units that remained mixed-eligible but where the number of eligible members increased on account of the restorations. A small number of LPRs (about 125,000) lost eligibility because the income of some newly eligible family members was counted differently and put families over the FSP income threshold. Some U.S. citizen children in these families also lost FSP eligibility.

The Farm Bill restorations increased the number of people receiving food stamp benefits by an estimated 779,000 in 2004. The median benefit level for LPR families with and without children also increased by several hundred dollars as a result of the restorations.

Partially on account of the restorations, the share of food stamp units headed by noncitizens increased from 20 to 25 percent between 1999–2000 and 2003–04. Since noncitizen units participated at lower rates than citizen units, their increased share of the total eligible population lowered overall participation.

Regression analysis suggests that increasing FSP participation among eligible noncitizen families was driven somewhat by the restorations—especially among families without any citizen members—but also by the same factors that increased participation among other demographic groups. The overall participation rate among families with children increased from 61 to 72 percent from 1999–2000 to 2003–04, and this rate includes a 13 percentage point increase among all-citizen families, which were unaffected by the restorations. Changes in

economic conditions over the study period (1999–2000 to 2003–04) do not appear to have significantly affected participation, suggesting that improvements in program outreach, access and eligibility expansions—such as more lenient vehicle rules and categorical eligibility for noncash welfare program participants—had a positive impact on participation over this period, for both citizens and eligible noncitizens.

### ***How Was the Study Conducted?***

This study used U.S. Current Population Survey (March Annual Social and Economic Supplement) data from three periods:

- 1999–2000 (baseline that predates the 2001–02 economic slowdown);
- 2001–02 (a period of caseload growth during the economic slowdown, eligibility expansions, and application streamlining); and
- 2003–04 (during and immediately following the Farm Bill’s legal immigrant restorations).

The data in their public form are generally not capable of precisely measuring how the Farm Bill restorations affected LPRs because they do not distinguish the legal status of noncitizens. Additionally, the public-use data include a considerable amount of misreporting of the use of food stamps and other benefits. In response to these data limitations, the Transfer Income Model (TRIM3) has been developed at the Urban Institute under primary funding from the Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation (HHS/ASPE). TRIM3 distinguishes between LPRs, undocumented immigrants, and other noncitizens; calculates eligibility and benefit levels; corrects for underreporting of Food Stamp Program participation; and allows for simulating policy changes such as the Farm Bill restorations.

We tracked trends in food stamp eligibility and participation by the immigration status of units (all citizens, LPR/citizens, LPR/other noncitizens, undocumented/citizens, and refugees). We also conducted regression analyses comparing the restoration period with the pre-restoration period, to isolate changes in eligibility and participation from the Farm Bill restorations, from changes in economic conditions, and from other factors affecting overall eligibility and participation trends. TRIM3's microsimulation capabilities allowed us to simulate LPR eligibility and participation for 2003 and 2004 with and without the Farm Bill restorations. TRIM3 simulations also allowed us to calculate the impact of the Farm Bill relative to the impact of a full restoration of food stamp benefits to all LPRs.

## **Study Background**

This is the last in a series of three reports on legal immigrants' food stamp use during 1999–2004—a period before, during, and after implementation of the legal immigrant eligibility restorations in the 2002 Farm Security and Rural Investment Act. The purpose of the study is to assess the impact of the 2002 Farm Bill's legal immigrant restorations on the FSP eligibility and participation of units with children that include LPRs.<sup>1</sup> By eligibility we mean the number of people or family units who meet the federal program criteria to receive benefits. By participation we mean the number of people or family units who actually sign up for and receive benefits.

The first report outlined our methodology and provided baseline figures for 1999–2000, several years before the Farm Bill was passed. The second report updated the first report with figures on legal immigrants' eligibility and participation in the FSP for 2001–02. It also showed trends between 1999–2000 and 2001–02, the period leading up to the Farm Bill restorations. The current report updates these trends through 2003–04 and captures the year during which the

restorations were initially implemented (2003 for the two major restorations) as well as the year immediately following implementation (2004).

### ***Changes in Legal Immigrant Eligibility for the Food Stamp Program***

Before the enactment of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) in 1996, legal immigrants were eligible for food stamps on the same terms as citizens. PRWORA effectively barred most legal immigrants from the FSP until they became citizens. Limited exceptions were made for some groups considered vulnerable or deserving of assistance: refugees, asylees, legal immigrants who had served in the military, and legal permanent residents (LPRs) who could prove they had worked 40 quarters (10 years) in covered employment (Fix, Zimmermann, and Passel 2001).

Since PRWORA's enactment there have been two Congressional restorations of food stamp benefits to legal immigrants. The first, passed in 1998, restored food stamps to LPR children, and disabled immigrant who entered the United States before PRWORA's enactment on August 22, 1996, as well as to LPR immigrants who had reached age 65 and resided in the United States as of that date. The 1998 law also extended the period of eligibility for refugees from their first five to their first seven years in the United States. In May 2002, the Farm Security and Rural Investment Act introduced three major changes in legal immigrant benefit eligibility. First, legal (or "qualified") immigrants who had "received a disability benefit for their condition" became eligible for the FSP on October 1, 2002. The second and broadest restoration enacted under the Farm Bill extended FSP eligibility to all qualified legal immigrants who had been in the United States for five or more years, effective April 1, 2003. This provision effectively extended eligibility to many working-age noncitizens. The third major restoration, effective

---

<sup>1</sup> In this report we use the terms "legal permanent resident" (LPR) and "legal immigrant" interchangeably.

October 1, 2003, extended eligibility to all qualified legal immigrant children under 18, without regard to the length of time they had been in the country.

In early 2003, as states were planning implementation of the Farm Bill food stamp policy changes, the Food and Nutrition Service (2003) estimated that “some 400,000” legal immigrants who lost eligibility under PRWORA would become eligible and participate as a result of the restorations. The purpose of our study is to estimate just how many more legal immigrants were eligible for and participating in the FSP in 2003–04, following the Farm Bill restorations, than in the years before the restoration (1999–2002). We develop these estimates using data from the U.S. Current Population Survey (CPS), augmented with the Urban Institute’s assignment of legal status to individuals and imputation of FSP eligibility and participation to units (Passel and Clark 1998; Passel, Van Hook and Bean 2004).

### ***Focus on Mixed Citizenship and Mixed-Eligible Units***

Our study focuses most closely on units with children, especially “mixed citizenship” units—those that include at least one citizen and at least one noncitizen. In most cases, the noncitizens are adults and the citizens are children. These mixed citizenship units often have mixed eligibility for food stamps—i.e., some members are eligible for the program but others are not—because noncitizen eligibility restrictions apply to some members but not to others. As a result, these mixed citizenship units tend to be eligible for lower levels of benefits than comparable units where all members are citizens—or in some cases eligible noncitizens.<sup>2</sup> Thus, we assess not only changes in the number of noncitizen units that are eligible for food stamps, but also changes in the number of units that are mixed-eligible. We assume that participation among units

with ineligible noncitizen members is lower because they are eligible for lower benefits than otherwise comparable units where all members are citizens.

### ***Recent Increases in Food Stamp Caseloads***

The drop in the number of people participating in the FSP during the late 1990s was particularly sharp among noncitizen units, but participation fell for other groups as well. Units of all types were affected by a strong economy, which pushed some units over income eligibility limits and reduced the size of the benefits for which other units would be eligible, giving them less incentive to participate. The combination of prosperity and welfare reform produced a steep decline in TANF cash assistance that carried over to FSP: many TANF leavers left both programs even though they remained eligible for food stamps. FSP time limits for unemployed able-bodied adults without dependents (ABAWDS), included in PRWORA along with the restrictions on noncitizen eligibility, also depressed program participation.

After dropping to a monthly average of 17.2 million individual participants in fiscal year (FY) 2000, FSP participation rebounded to 26.5 million in FY 2007, an increase of over 50 percent (Food and Nutrition Service 2007). As with the participation decline of the late 1990s, the economy and policy changes both contributed to the upward trend. The boom of the 1990s turned into the recession of 2001, followed by a relatively weak recovery. Policy changes included expansion of categorical eligibility to include noncash TANF recipients, up to five months of transitional benefits for TANF leavers, more liberal treatment of automobiles under FSP asset rules, longer certification periods, less frequent reporting requirements, and increased outreach to eligible nonparticipants. Many of these changes aimed at increasing participation

---

<sup>2</sup> The population that is income eligible for food stamps incorporates many mixed citizenship units that include undocumented immigrants and citizens. We model the FSP participation of these units, even though undocumented

among working units (Wolkwitz 2007). Such changes may have had particularly strong impacts on immigrant units, who are more likely than other eligible units to include at least one worker. In 2004, 79 percent of low-income eligible units with at least one noncitizen had earnings, compared with 49 percent of low-income eligible all-citizen units.<sup>3</sup>

## **Methods**

This section of the report briefly outlines the study methods. The methodology is described in much greater detail in the appendix to this report.

### ***Data and Sample Used for Analysis***

Our approach involves the use of Current Population Survey data for 1999–2004, with several important innovations that help us better isolate the impact of FSP participation trends and the impact of Farm Bill eligibility restorations on units with legal immigrants. Our analysis uses the Transfer Income Model (TRIM3), which has been developed at the Urban Institute under primary funding from HHS/ASPE. TRIM3 distinguishes among immigrants by legal status, determine eligibility for food stamps, and correct for underreporting and misreporting of FSP participation by survey respondents. We group the data into three samples:

- 1999–2000 (baseline that predates the 2001–2002 economic slowdown);
- 2001–02 (a period of caseload growth during the economic slowdown, eligibility expansions, and application streamlining); and
- 2003–04 (during and immediately following the Farm Bill’s legal immigrant restorations).

---

immigrants are ineligible for the FSP and their eligibility was not changed by PRWORA or the Farm Bill.

<sup>3</sup> Figures calculated by authors from 2004 calendar year CPS TRIM3 data.

### *Classifying Units by Citizenship and Legal Status*

One essential component of TRIM3 is the assignment of legal status to immigrants in the CPS data, as some LPRs are eligible for the FSP while undocumented immigrants are entirely ineligible. The CPS asks whether respondents and other unit members are

- (1) U.S.-born citizens;
- (2) U.S. citizens born in the territories;
- (3) U.S. citizens born abroad to U.S. citizen parents;
- (4) foreign-born naturalized U.S. citizens; or
- (5) noncitizens.

TRIM3 further distinguishes those in the “noncitizen” category by legal status:

- (a) **refugees and asylees**—immigrants admitted to the United States because of fear of persecution in home countries and who are therefore eligible for federal assistance upon their resettlement;
- (b) **legal temporary residents**—students, workers, and other visitors with temporary visas;
- (c) **legal permanent residents (LPRs)**—the bulk of legal immigrants, who are admitted for employment or because of close unit ties with U.S. citizens or legal residents; and
- (d) **undocumented immigrants**—immigrants who entered the United States illegally, overstayed a valid visa, or otherwise violated the terms of their admission.

We use TRIM3’s assignments of legal status to calculate the number of citizen, LPR, undocumented, and refugee members in each unit. We then classify units into six types of units according to citizenship and legal status:

1. **All citizen:** The largest group of units includes only citizens. We use citizen-only units as a control group to contrast patterns of food stamp eligibility and use with those for units with noncitizen members.
2. **LPR/citizen:** The second largest group among units with children, these units contain at least one legal permanent resident and at least one U.S. citizen. They may or may not contain immigrants with other types of legal status. A large share of these units is mixed eligible, because some members are ineligible noncitizens (usually the parents) and others are eligible citizens (usually the children).



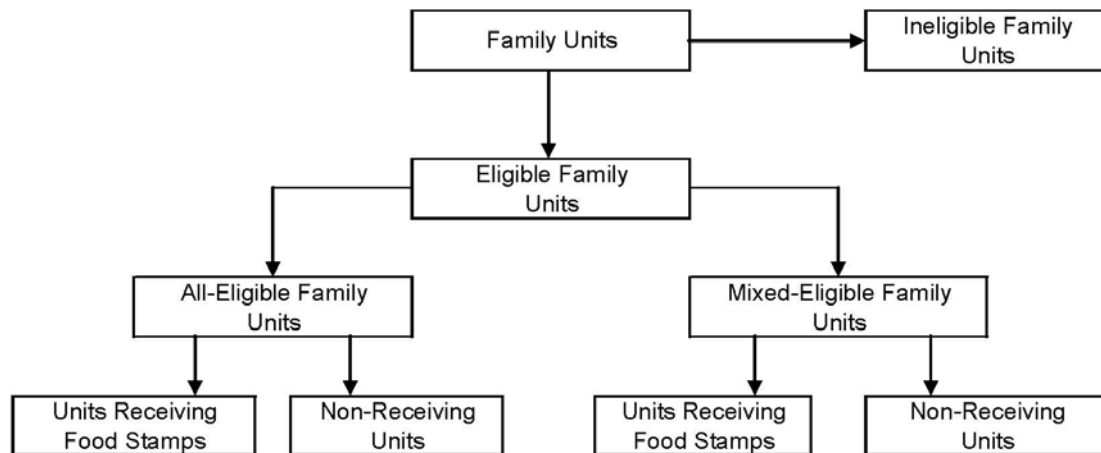
3. ***LPR/other noncitizen***: These units have at least one legal permanent resident but no citizen members; most other members of these units are either other LPRs or undocumented immigrants, although some may be refugees or temporary residents. This group is a small share of units with children but a larger share of units without children. Some of these units are ineligible because of LPR restrictions, while others are mixed eligible. Still others are universally eligible because all unit members are covered by the exceptions written into PRWORA or by the later restorations.
4. ***Undocumented/citizen***: These units contain at least one undocumented immigrant and at least one U.S. citizen; they may or may not contain immigrants with other types of legal status. None of the undocumented members of these units are eligible for food stamps, so all eligible units in this group have mixed eligibility.
5. ***All undocumented***: These units are composed solely of undocumented immigrants and are excluded from our analysis. No members are eligible for food stamps.
6. ***Refugee***: These units are composed either solely of refugees or of refugees and citizens. It is important to distinguish refugee units from those with LPR members because refugees and LPRs have been subject to different eligibility provisions. Under PRWORA, refugees were eligible for their first five years in the United States; this was extended to seven years in 1998.

### ***Defining Mixed-Eligible Units***

We begin by identifying family units that are eligible for the FSP; in other words, families which meet the criteria for program participation—including citizenship and legal status as well as non-immigration related criteria. Within the group of family units that are food stamp eligible, some units face restrictions that result in some members being eligible while others are not. We use the term “mixed-eligible” to refer to these units. By contrast, we term units where all members are eligible “all-eligible units.” In general, all-eligible units qualify for higher benefits, because benefits are based in part on the number of eligible family members. Among both mixed- and all-eligible units, some participate in the FSP and others choose not to participate. We calculate the share of units receiving food stamps separately for mixed- and all-eligible units in order to explore how mixed eligibility affects participation (figure 1).

LPR/citizen and undocumented/citizen units have high mixed-eligibility rates because of restrictions on the eligibility of their LPR and undocumented members. Usually the adults are ineligible noncitizens, while the children are mostly U.S.-born citizens. The PRWORA restrictions on LPR food stamp eligibility cause many eligible LPR/citizen units who would otherwise be universally eligible to be mixed eligible. Undocumented immigrants are and have always been ineligible for food stamps, so eligible units that contain undocumented immigrants are always mixed eligible.

**Figure 1: Food Stamp Eligibility and Receipt Flowchart**



### ***Baseline Simulation***

In our “baseline simulation,” TRIM3 uses FSP eligibility rules—including those for noncitizens—in place at the time the data were collected to calculate eligibility, participation, and the amount of benefits received. Our baseline simulation for 2003 includes eligibility adjustments in TRIM3 for the first two Farm Bill restorations: disabled legal immigrants (October 2002) and legal immigrants with at least five years of U.S. residency (April 2003). The 2003 baseline *does not include* eligibility adjustments for the third restoration, to all LPR

children regardless of length of residency, which took place in October 2003. The third restoration is included in our 2004 baseline, along with the other two restorations.

TRIM3 estimates monthly eligibility and participation for family units. We use TRIM3 to identify units that were eligible for and/or received food stamps *during any month in the year*. We also calculate eligibility and participation for individuals, again annually. In all of our simulations, the eligibility rate is the number of individuals or family units that are eligible for food stamps divided by the total number of low-income individuals or units. The participation rate is the number of people or units that receive food stamps divided by the eligible population.

### ***Alternative Simulations***

We also conducted two alternative simulations, using TRIM3: one that estimates eligibility and participation rates of low-income units had the Farm Bill legal immigrant restorations not occurred, and a second that estimates eligibility and participation without any of the legal immigrant eligibility restrictions PRWORA in place—in other words, as if a full eligibility restoration had occurred.

### ***Analysis of Trends in FSP Eligibility and Participation***

In this report we discuss trends in food stamp eligibility and participation for low-income units between 1999–2000 and 2003–04. We examine eligibility, mixed eligibility, and participation rates for low-income units disaggregated by the presence of children and the citizenship and legal status categories described above. Our analyses in this report capture trends in FSP eligibility before and after the Farm Bill restorations.

### ***Decomposition of Trends in Participation Rates***

We apply demographic decomposition techniques to changes between 1999–2000 and 2003–04 in the participation rate among low-income units with children that are eligible for the FSP.

Specifically, we allocate the change in FSP participation rates between 1999–2000 and 2003–04 into the proportions due to each of the following:

- change in the share of all citizen, LPR/citizen, undocumented/citizen, LPR/other noncitizen and refugee units;
- change in the share of mixed eligible units; and
- change in the underlying participation rate for these units.

### ***Regression Analysis of Food Stamp Participation***

Using logistic regression techniques, we model food stamp participation among low-income units that are eligible for the FSP. In this report we display findings from a regression model of participation in 2003–04. We also report estimates from a regression model of change over time in participation between 1999–2000 and 2003–04. Our models control for family unit's immigration status, unit characteristics (e.g., number of adults and children), state economic conditions, and state of residence (only California and Texas were significant).

## **Findings for 2003 and 2004**

This section of the report discusses food stamp eligibility and participation in 2003 and 2004, and it places these findings in the context of our earlier work on eligibility and participation in 1999 through 2004. In some cases we present findings only for 2004, but where patterns differ significantly between 2003 and 2004, we discuss findings for both years.

The changes witnessed during this period reflect both the Farm Bill restorations and the fact that the low-income population increasingly consists of units that contain noncitizens; this

phenomenon is increasingly prevalent among units with children. In 1999–2000, all-citizen units composed the vast majority of low-income eligible food stamp units (nearly 90 percent), but the share of all-citizen units was lower among units with children (about 80 percent). A large majority of noncitizen units with children had mixed citizenship—either LPR/citizen or undocumented/citizen—but the majority of noncitizen units without children were composed entirely of noncitizens.<sup>4</sup> Among low-income units with children, LPR/citizen units were as likely as all-citizen units to be eligible for the FSP (with a rate of about 60 percent), and undocumented/citizen units were more likely to be eligible (with a rate of about 80 percent). About two-thirds of LPR/citizen units with children had mixed eligibility because of the PRWORA restrictions, and all undocumented/citizen units were mixed eligible. In contrast, only 2 percent of all-citizen units with children were mixed eligible. About one-quarter of eligible undocumented/citizen units with children, and one-third of LPR/citizen units, participated in the FSP, compared with two-thirds of all-citizen units. Thus, the mixed eligibility of mixed-citizenship units with children appears to have driven down their participation rates. Other factors such as language barriers, misunderstandings about the eligibility of children, and fear of immigration consequences (such as deportation in undocumented/citizen units) may have also reduced their participation (Holcomb et al. 2003).

### ***Demographics of Low-Income, FSP-Eligible and Participating Units in 2004***

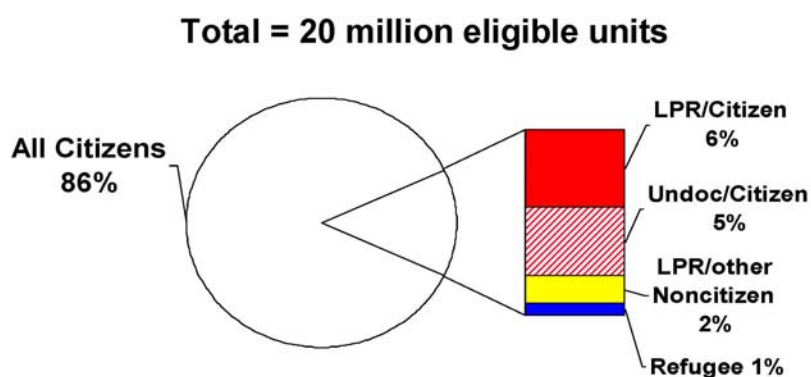
In 2004, noncitizen units composed a small yet significant minority of units eligible for the FSP. As in 1999–2000, most noncitizen units were mixed-citizenship units. Fourteen percent of all low-income FSP-eligible units contained noncitizens, with the two dominant groups being

---

<sup>4</sup> This difference is because citizen members of immigrant units are most often children, since most children of immigrants are born in the United States.

LPR/citizen units (6 percent) and undocumented/citizen units (5 percent). Units with no citizens present but at least one LPR accounted for 2 percent of eligible units, while units with refugees were 1 percent of the low-income eligible population (figure 2). The corresponding figures for 2003 are virtually the same.

**Figure 2: Citizenship and Legal Status of Low-Income Food Stamp–Eligible Units, 2004**



*Source:* Urban Institute analysis of U.S. Current Population Survey data for March 2005, using TRIM3 Food Stamp Program eligibility simulations.

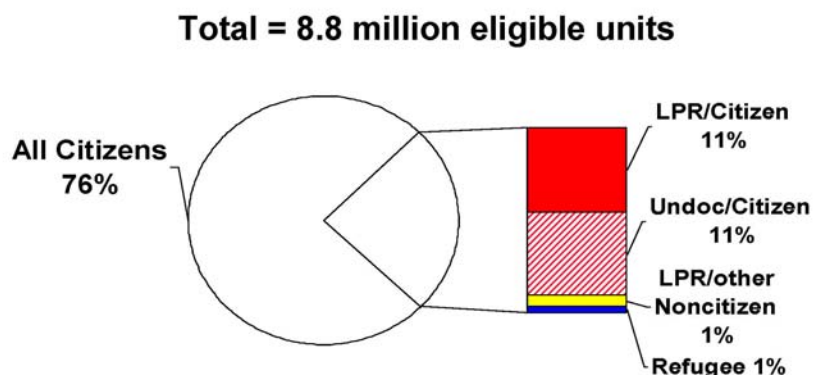
*Notes:* Unit income is below 200% of the federal poverty level. LPR/other noncitizen units include at least one legal immigrant.

Limiting our universe to low-income eligible units with children changes the distribution somewhat, but in 2004, all-citizen units still composed the vast majority (76 percent) of eligible units (figure 3). LPR/citizen and undocumented/citizen units each made up 11 percent of eligible units, while units with refugees and those composed entirely of LPRs and other noncitizens together accounted for the remaining 2 percent. Again, patterns were similar for 2003.

The share of low-income eligible units with children that included noncitizens increased modestly between 1999–2000 and 2003–04 (from 20 to 25 percent, difference from figure 3 due to rounding). In both periods, the vast majority of eligible noncitizen units had mixed citizenship—either LPR/citizen or undocumented/citizen. Most mixed-citizenship units were units with children, and in most cases the U.S. citizens were children while the adults were LPRs

or undocumented immigrants. As a result, the PRWORA restrictions on immigrant eligibility mostly affected the eligibility of adults but not the children in these units.

**Figure 3: Citizenship and Legal Status of Low-Income Food Stamp–Eligible Units with Children, 2004**



*Source:* Urban Institute analysis of U.S. Current Population Survey data for March 2005, using TRIM3 Food Stamp Program eligibility simulations.

*Notes:* Unit income is below 200% of the federal poverty level. LPR/other noncitizen units include at least one legal immigrant.

### ***Baseline Simulation of FSP Eligibility and Participation***

Low-income units with children were far more likely than childless units to be eligible for the FSP in 2003 (62 percent versus 48 percent, as shown in table 2). Among units with children, undocumented/citizen units were by far the most likely to be eligible (85 percent), probably because of their relatively low income levels. Seventy percent of units with refugees were FSP eligible, followed by all-citizen units (62 percent) and LPR/citizen units (60 percent). LPR/other noncitizen units had the lowest eligibility rate (36 percent), most likely because most of these units only had members who were ineligible noncitizens.

Childless units showed considerably less variation in eligibility rates. All-citizen units had the highest eligibility rate (50 percent), followed closely by refugee units (46 percent),

LPR/other noncitizen units (46 percent) and LPR/citizen units (44 percent).

Undocumented/citizen units lagged behind the others, with an eligibility rate of 35 percent.

The presence of children had a large influence on mixed eligibility rates in 2003. Eligible units with children were four times as likely as eligible childless units to be mixed eligible (16 percent versus 4 percent). Mixed-eligibility rates for units containing children were 100 percent for undocumented/citizen units, 32 percent for LPR/other noncitizen units, and 29 percent for LPR/citizen units. Only a negligible fraction of all-citizen units and refugee units (2 percent and 1 percent, respectively) were mixed eligible. The corresponding figures for childless units were quite similar to units with children for every category except LPR/other noncitizen units; such childless units were only half as likely to be mixed eligible as those with children (17 percent versus 32 percent). Among the other childless units, all eligible undocumented/citizen units were mixed eligible, followed by LPR/citizen units (37 percent) and refugee and all-citizen units (both at 3 percent).

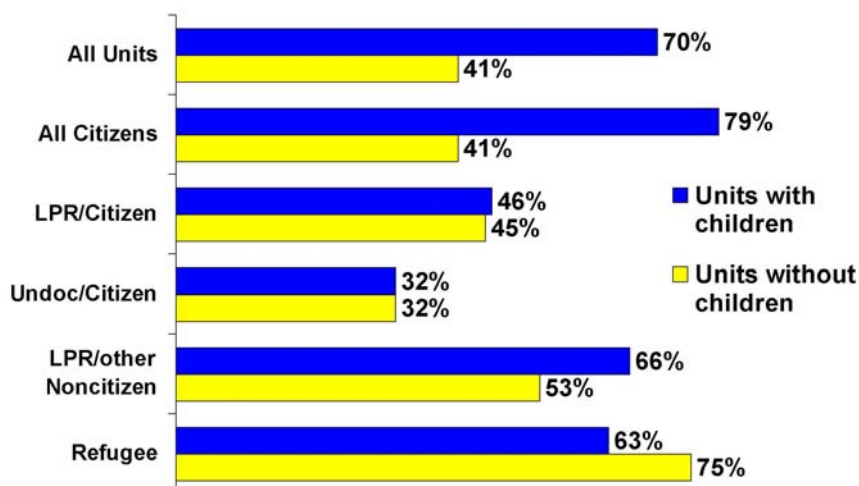
As was true for mixed eligibility rates, eligible units with children were much more likely to participate in the FSP (70 percent) than eligible childless units (41 percent) in 2003 (figure 4). In examining participation patterns among units with children, we find that all-citizen units had the highest participation rate, at 79 percent, followed by LPR/other noncitizen units (66 percent), refugee units (63 percent), and legal citizen units (46 percent). Despite being the most likely group to be eligible (85 percent), undocumented/citizen units had the lowest participation rate, at 32 percent.

Patterns in eligibility, mixed eligibility, and participation in 2004 (table 7) were similar to those for 2003 in most respects. There were, however, some differences in our 2004 data worth noting due to the effects of the October 2003 restoration to LPR children. As was true in 2003,



units with children were considerably more likely to be eligible, be mixed eligible, and to participate in the FSP than childless units were in 2004. Among units with children, 61 percent of all citizen units were eligible, and 60 percent of LPR/citizen units were eligible, as were 86 percent of undocumented/citizen units. The biggest change in eligibility rates occurred among LPR/other noncitizen units; their eligibility rates nearly doubled, jumping from 36 percent to 68 percent between 2003 and 2004. The eligibility rate for refugee units appear to have declined between 2003 and 2004 from 70 percent to 59 percent, but this single year change may be insignificant given the relatively small sample of refugee families in the data. Comparisons of baseline figures to alternate simulations assuming pre-restoration rules will be presented later in the paper and will better allow us to isolate the impact of the restorations on family units that include LPRs.

**Figure 4: Participation Rates for Low-Income Food Stamp–Eligible Units, 2003**



*Source:* Urban Institute analysis of U.S. Current Population Survey data for March 2004, using TRIM3 Food Stamp Program eligibility simulations.

*Notes:* Unit income is below 200% of the federal poverty level. LPR/other noncitizen units include at least one legal immigrant.

There were slight changes between 2003 and 2004 in the percentage of units that were mixed eligible. The overall mixed-eligibility rate for units with children was stable between 2003 and 2004, at 16 percent. The mixed-eligibility rate for LPR/citizen units declined by only 3 percentage points, from 29 to 26 percent. Mixed-eligibility rates for eligible LPR/other noncitizen units with children actually increased, from 32 percent in 2003 to 61 percent in 2004. The mixed-eligibility rate for refugees also increased, from 1 percent to 14 percent. Mixed-eligibility rates for all-citizen units with children remained at 2 percent, and undocumented/citizen units remained 100 percent mixed eligible, again due to the presence of the undocumented, who are ineligible for the FSP.

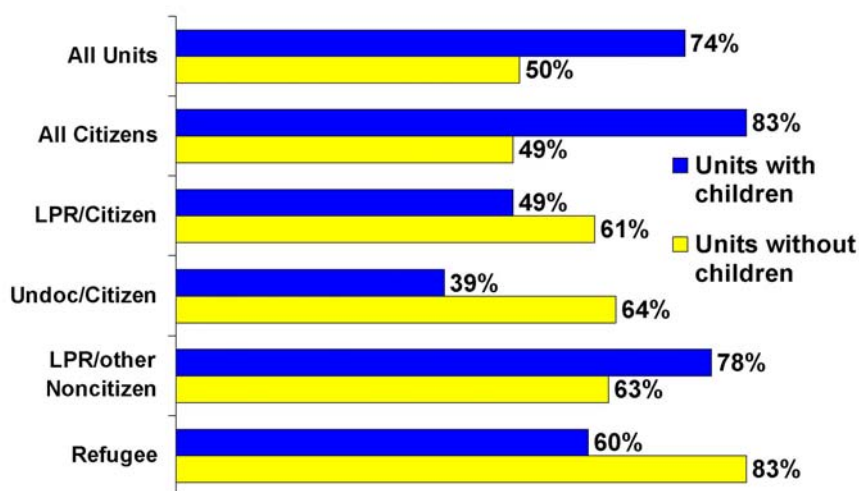
Mixed-eligibility rates remained steady for childless units as well; the overall rate only changed 1 percentage point, from 4 percent in 2003 to 5 percent in 2004. The biggest rate drop occurred in LPR/citizen units, which dropped from 37 percent to 32 percent mixed eligible. The biggest rate increase occurred among refugee units, which jumped from 3 percent to 17 percent mixed eligible. Mixed-eligibility rates for LPR/other noncitizen units (17 percent in 2003, 16 percent in 2004), all-citizen units (3 percent in 2003, 4 percent in 2004), and undocumented/citizen units (100 percent for both years) all remained stable during this period.

Overall participation rates (for all units, with and without children) increased, from 54 percent in 2003 to 60 percent in 2004 (table 7). Units with children had an overall participation rate of 74 percent in 2004 (figure 5), compared with 70 percent in 2003. The biggest change in participation rates among units with children occurred among LPR/other noncitizen units, whose participation rates increased 12 percentage points, from 66 percent to 78 percent. The participation of LPR/citizen units with children increased from 46 percent to 49 percent, and all-

citizen units rose from 79 percent to 83 percent, while undocumented/citizen units jumped from 32 percent to 39 percent.

Increases in participation rates among childless units were even more substantial; overall, such units' participation rates climbed from 41 percent in 2003 to 50 percent in 2004 and every group's participation rate increased. The participation rate among childless LPR/citizen units rose from 45 percent to 61 percent during that period. Participation rates for undocumented/citizen units doubled, from 32 percent in 2003 to 64 percent in 2004. The participation rate for LPR/other noncitizen units increased from 53 percent to 63 percent, the refugee rate from 75 percent to 83 percent, and the all citizen rate increased from 41 percent to 49 percent.

**Figure 5: Participation Rates for Low-Income Food Stamp–Eligible Units, 2004**



*Source:* Urban Institute analysis of U.S. Current Population Survey data for March 2005, using TRIM3 Food Stamp Program eligibility simulations.

*Notes:* Unit income is below 200% of the federal poverty level. LPR/other noncitizen units include at least one legal immigrant.

***Alternative Simulation: PRWORA Legal Immigrant Restrictions Left in Place***

We conducted alternate simulations of food stamp eligibility and receipt in 2003 and 2004 with the PRWORA LPR eligibility restorations still in place, in order to estimate the impact of the restorations. All-citizen units, undocumented/citizen units and refugee units were not affected in this alternate scenario, since these unit types did not contain legal permanent residents. Both the baseline and alternative scenarios assumed no sponsor deeming—for reasons discussed in the detailed methodology appendix to this report; if deeming were taken into account, the differences between the scenarios discussed here could be slightly smaller.

*Simulation for 2003.* In terms of eligibility rates, the two groups affected the most in 2003 were LPR/other noncitizen units without children and LPR/citizen units with children. In 2003, the eligibility rate for childless LPR/other noncitizen units without the Farm Bill restorations would have been 29 percent, a figure 17 percentage points lower than the participation rate in the baseline simulation (tables 4 and 5). This translates into 114,000 fewer units being eligible for food stamps without the restorations. The changes for LPR/citizen units with children were more modest and actually resulted in a net decrease in the number and share of low-income units eligible for the FSP in 2003; the eligibility rate in the no-restoration scenario was 2 percentage points higher than that in the baseline scenario, and 26,000 more units were eligible for the program.

This finding initially seems counterintuitive, but it is explained by the fact that making more adult unit members categorically eligible for food stamps means that the incomes of individuals whose earnings were originally prorated for eligibility determination are now counted in full. This change causes some units to rise above the income eligibility threshold and lose their food stamp benefits.

The Farm Bill had the opposite effect in LPR/other noncitizen units without children. Before the restorations, many of these units were composed solely of individuals who were categorically ineligible for the FSP. The restoration made many of these units' LPR members newly eligible, and the number of units that became newly eligible far outweighed the number of units that might have lost eligibility because of an increase in countable income.

The largest impact of the 2003 LPR restorations was on the number of mixed-eligibility units, particularly units with children. In 2003, the restorations reduced the number of mixed-eligible units with children by 347,000. The primary category driving this change among units with children was the LPR/citizen category, in which the mixed-eligibility rate dropped by 30 percentage points, or more than 318,000 units (from 606,000 to 287,000). The mixed-eligibility rate for refugee units with children dropped by a comparable 28 percentage points because of the restorations, but the absolute drop (28,000 units) was much lower than it was for LPR/citizen units because of the small relative size of the refugee population. Changes in mixed eligibility were more modest among units without children in 2003; the restoration reduced the number of mixed-eligible LPR/citizen units by 26,000 units, but the decrease was balanced out by an increase of 26,000 among childless LPR/other noncitizen units.

In the end, the restoration had very little impact on the net number of units that received food stamps in 2003. Only 71,000 more units participated in the FSP under the baseline scenario than under the no-restoration scenario. All the net increase was due to childless LPR/other noncitizen units.

While the restorations did not substantially increase the number of noncitizen *units* who became eligible for or received food stamps in 2003, the restorations did greatly increase the number of *individuals* who gained eligibility and participated. Overall, about 835,000 more

noncitizens were eligible for food stamps in 2003 than would have been eligible in the absence of the restorations (table 14). About 355,000 of these newly-eligible individuals resided in units that became newly eligible (i.e., no member of the unit was eligible for food stamps without the restorations). Another 471,000 resided in units that were mixed eligible without the restorations but became fully eligible with them. An additional 104,000 were in units that were mixed eligible in both the baseline and no-restoration scenarios, but where the number of eligible members increased. About 95,000 people lost eligibility because of the restorations (again, because their units were pushed above the income eligibility threshold). About 521,000 individuals newly participated in the FSP on account of the restorations.

The impact of the restorations was not evenly distributed across age groups in 2003; only 20,000 of the 835,000 new net eligible people were children. About 72,000 children lived in units that became newly eligible because of the restoration, 20,000 resided in units that transitioned from mixed to full eligibility, and another 2,000 were in units that remain mixed despite the restorations. The addition of these 94,000 children was heavily offset by the 74,000 who lost eligibility because of the restorations, resulting in a net gain of only 20,000 children. About 57,000 more children newly participated in the FSP on account of the restorations.

Of the net 815,000 newly eligible adults, 450,000 of them resided in units that transitioned from mixed to fully eligible, 283,000 lived in units that the restoration made newly eligible, and 102,000 were in units that remained mixed eligible despite the addition of one or more newly eligible members. Only 20,000 adults lost eligibility for the FSP and 464,000 more adults ended up participating.

In 2003, the restorations increased median annual benefits by several hundred dollars among noncitizen families with children. LPR/citizen units with children were eligible for \$478

more in the baseline than in the no-restoration simulation (table 18). LPR/other noncitizen units and refugee units with children were also eligible for significantly more benefits than they would have been without the restoration: \$410 and \$472, respectively. The difference in median annual benefits between the baseline and no-restoration simulations was much smaller for units without children than for those with children.

*Simulation for 2004.* Our comparison between the baseline and no-restoration scenarios showed similar patterns in 2004 as in 2003, but with some important differences, especially for children. Again, childless LPR/other noncitizen units had the largest absolute difference between scenarios: nearly 100,000 more units were eligible for food stamps in the baseline run than were eligible in the no-restoration scenario (290,000 versus 193,000), and their eligibility rate in the baseline scenario was 15 percentage points higher (tables 9 and 10). LPR/other noncitizen units with children showed the largest difference between scenarios: their eligibility rate nearly tripled, from 24 percent in the no-restoration scenario to 68 percent in the baseline simulation. This amounted to an absolute increase of 81,000 units (from 45,000 to 126,000 units) on account of the restorations.

The eligibility/receipt category with the largest difference between the baseline and no-restoration scenarios was the number of mixed-eligible units again in 2004. There were 305,000 fewer mixed-eligibility units in the baseline than in the no-restoration scenario. Again, the group responsible for the vast majority of the change in this figure was LPR/citizen units with children: there were 620,000 mixed-eligible units in this group in the no-restoration simulation and 259,000 units in the baseline, a difference of 361,000 units. LPR/other noncitizen units with children also contributed to the change in mixed eligibility, but this change was in the upward direction: 56,000 more units were mixed eligible in the baseline scenario than in the no-

restoration scenario (and the mixed-eligibility rate was 16 percentage points higher), but this was because there were far more eligible units overall in the baseline scenario than in the no-restoration scenario. Many LPR/other noncitizen units with children that gained eligibility on account of the Farm Bill restorations—mostly through the last restoration to children—included some members that were still ineligible in 2004; presumably these were LPR adults with less than five years of residency.

The absolute difference in the number of units receiving food stamps between the scenarios in 2004 was twice that in 2003. In 2004, 139,000 more units received food stamps in the baseline than in the no-restoration simulation. The change was evenly split between LPR/other noncitizen units with children and those without: both categories had net gains of roughly 70,000 units between the simulations. This amounted to a 13 percentage point increase in participation rates among LPR/other noncitizen units with children and a 5 percentage point increase in participation rates among those without children, due to the restorations.

As in 2003, differences between the simulations in the numbers of eligible and receiving individuals were considerably greater than the corresponding figures at the unit level. About 1.03 million more people in units containing noncitizens were eligible for the FSP than would have been eligible without the restorations (table 14). About half (528,000) of these individuals were in units that became newly eligible, while 506,000 were in units that transitioned from mixed to full eligibility, and another 125,000 resided in units that remained mixed eligible but where the number of eligible members increased on account of the restorations. This combined total of 1.16 million new eligible noncitizens was offset by 125,000 individuals who lost their eligibility; 779,000 individuals newly participated in the FSP.



Although the majority of the newly eligible individuals were adults, the restoration of all LPR children made a large difference in the number of children eligible for the FSP. The net difference between the baseline and no-restoration scenarios in eligibility was only 20,000 children in 2003 but jumped to 201,000 in 2004. On account of the restorations, there were 209,000 children in units that became newly eligible. Another 48,000 children were in units that were mixed eligible and became fully eligible because of the restorations, and an additional 46,000 were in units that remained mixed even with the addition of newly eligible children. These 303,000 newly eligible children were offset by 102,000 children who lost eligibility because of the restorations. Altogether 241,000 children newly participated in the FSP.

A net total of 833,000 adults became newly eligible in 2004 because of the restorations. More than half (458,000) were in units that changed from mixed to fully eligible; 320,000 were in newly eligible units, while 79,000 were in units that retained their mixed eligibility status. Only 24,000 adults lost their eligibility because of the restoration. Over half a million (538,000) more adults participated in the FSP.

As in 2003, the restorations resulted in significantly higher benefit levels for noncitizen family units, especially those with children. In 2004, LPR/citizen units, LPR/other noncitizen units, and refugee units (all with children) were eligible for \$662, \$274, and \$344 more in annual benefits, while LPR/citizen units without children were eligible for \$365 more annually in the baseline than they were with no restoration (table 18).

### ***Alternative Simulation: All Legal Immigrant Restrictions Removed***

Our other alternative simulation estimated the impact on FSP eligibility and participation of a full LPR eligibility restoration. Again, sponsor deeming was not modeled in this scenario. We

compared the eligibility, mixed eligibility, and receipt figures from our full-restoration simulation to the figures from the no-restoration scenario for comparison with the partial restoration that actually took place under the terms of the Farm Bill.

*Simulation for 2003.* In 2003, 248,000 more units would have been eligible for the FSP in the full restoration simulation than in the no-restoration simulation (tables 3, 4, and 6). This was much greater than the difference between the baseline with Farm Bill restorations and the no-restoration simulation: 87,000 units. All the difference in the number of eligible units between the full- and no-restoration simulations occurred in two groups: LPR/other noncitizen units with and without children. The difference in the number of eligible LPR/other noncitizen units without children was 180,000 (381,000 versus 202,000) units between the full- and no-restoration scenarios, and the eligibility rate rose by 26 percentage points (29 to 56 percent). There would have been 69,000 more LPR/other noncitizen units with children eligible in the full-restoration than the no-restoration simulation (113,000 versus 44,000 units), and the eligibility rate for this group would have increased by 38 percentage points, from 24 to 62 percent.

Making all LPRs eligible would have greatly reduced the number of mixed-eligible units in 2003. Over half a million (555,000) fewer units would have been mixed eligible in the full-restoration than in the no-restoration scenario. All the change would have occurred among three unit types, and the vast majority of the change would be among units with children. The largest absolute change would have occurred among LPR/citizen units with children: 482,000 fewer units would have been mixed eligible in the full- than the no-restoration scenario (606,000 versus 124,000 units); their mixed eligibility rate would have fallen by 47 percentage points (from 59 percent to 12 percent). The number of mixed-eligible refugee units with children would have declined by 28,000 (29,000 to 1,000) units, and their rate decreased by 28 percentage points

(from 30 to 1 percent). Childless LPR/citizen units would have accounted for the rest of the decrease—45,000 units (from 103,000 units to 58,000)—and their mixed-eligibility rate would have decreased from 51 percent to 27 percent.

FSP participation would have increased by 204,000 units in the full- versus no-restoration scenario in 2003. Two unit types would have been responsible for this change: LPR/other noncitizen units with and without children. The largest absolute difference between scenarios would have occurred among childless LPR/other noncitizen units, 137,000 more of whom would have received food stamps under the full- than the no-restoration scenario (232,000 versus 95,000 units); the participation rate in childless LPR/other noncitizen units would have climbed from 47 percent to 61 percent. The next largest participation increase (66,000—from 25,000 to 91,000) would have occurred among LPR/other noncitizen units with children; their participation rate would have increased by about 25 percentage points (from 55 to 81 percent).

Unsurprisingly, simulating a full restoration would have made an even bigger impact at the individual level than the actual restoration did. In 2003, 1.56 million net new individuals would have been eligible for food stamps that would not have been without restorations (table 15). Of these, 838,000 individuals lived in units that transitioned from being mixed eligible to being fully eligible, another 761,000 resided in units that were newly eligible, and 71,000 people were in units that remained mixed eligible even after the full restoration. These increases in individual eligibility would have been offset by a loss of 108,000 individuals from differences in countable income. Over 1 million of the newly eligible LPRs (1,084,000) would have participated in the FSP had all the eligibility restrictions been removed.

As was the case when comparing the actual 2003 figures with the non-restoration simulation, many more adults than children would have become eligible and/or received food

stamps under the full-restoration scenario. With a full restoration, 1.37 million net new adults would have become eligible. Of this number, 751,000 resided in units that transitioned from mixed to full eligibility, 571,000 lived in units that became newly eligible, and an additional 69,000 lived in units that remained mixed eligible. Only 23,000 adults would have lost eligibility with a full restoration. Of the new net eligible adults, 878,000 (64 percent) would have received food stamps.

In the full-restoration simulation, 194,000 net new children would have become eligible for food stamps; 190,000 of them were in newly eligible units, 87,000 in units that transitioned from mixed to fully eligible, and another 2,200 lived in units that retained their mixed-eligibility status. These gains were offset by the 86,000 children who would have lost their eligibility for food stamps. The number of children that would have newly participated in the FSP rose more than the number of newly eligible children overall (206,000 versus 194,000)—most likely because more families would have participated as more adults became eligible.

*Simulation for 2004.* The overall differences between the full- and no-restoration simulations were comparable at the unit level in 2003 and 2004. In 2004, 227,000 more units overall would have been eligible for the FSP in the full-restoration simulation than were in the no-restoration simulation (tables 8, 9, and 11). The bulk of this change would have occurred among childless LPR/other noncitizen units, 183,000 more of whom (193,000 versus 377,000 units) would have been eligible in the full-restoration scenario than in the no-restoration scenario; this translated into a 28-percentage point increase in the participation rate (29 to 57 percent). The remainder of the positive change would have occurred among LPR/other noncitizen units with children; the number would have increased by 70,000 units (from 45,000 to

115,000 units); and the eligibility rate would have increased by more than 2.5 times, jumping from 24 to 62 percent.

The number of mixed-eligibility units would have been 550,000 lower in the full-restoration simulation than in the no-restoration simulation in 2004. The overwhelming majority of this change took place in LPR/citizen units with children; there was a difference of 515,000 units (a decline from 620,000 to 105,000 units) between the two simulations, and the mixed-eligibility rate declined 50 percentage points (from 61 to 11 percent). The number of units receiving food stamps would have increased by 220,000 units overall, and as with the changes in eligibility and mixed eligibility, two unit types were responsible for all the increase. About 158,000 more childless LPR/other noncitizen units (270,000 versus 112,000 units) would have received food stamps in the full-restoration simulation than in the no-restoration simulation; the corresponding rate change was 14 percentage points (from 58 to 72 percent). Legal noncitizen units with children were responsible for the rest of the change: their numbers would have increased by 62,000 units (from 30,000 to 92,000), and their participation rate would have increased from 66 percent to 80 percent.

The 2004 individual-level estimate of the change in LPR participation from a full-restoration scenario was slightly higher than in 2003, but the change in eligibility was about the same. In 2004, a full restoration would have made 1.56 million more LPRs—1.36 million more adults and 199,000 more children—eligible than if the LPR restrictions had remained in place (table 17). An estimated 1.2 million additional eligible LPRs would have participated in the FSP had all LPR eligibility restrictions been removed in 2004; in 2003, the increase in participation would have been 1.1 million.

*Comparison between Farm Bill and full-restoration simulations.* While the increase in food stamp eligibility and participation at the unit level from the Farm Bill restorations was notable, the impact still fell substantially short of the change that would have occurred had a full restoration been enacted. In 2003 (using the no-restoration scenario as the comparison point), at the unit level, the Farm Bill's implementation only allowed 35 percent of the increases in eligibility and participation that would have occurred had there been a full restoration. When the remainder of the restoration was phased in (or at least became visible in our data) in 2004, the gap between simulations narrowed significantly. In 2004, the Farm Bill restorations extended eligibility to 65 percent of those units that would have been affected by a full restoration, while the effect on participation was 63 percent of that which would have occurred had there been a full restoration.

At the individual level, the Farm Bill restorations filled about two-thirds of the gap in eligibility between the welfare reform law rules—without any restorations—and a full restoration to all LPRs regardless of length of U.S. residency. In 2003, the Farm Bill restored eligibility to 835,000 people, about half (53 percent) of all the LPRs that would have had eligibility restored by a full restoration (1.56 million people). In 2004, the share of LPRs with eligibility restored by the Farm Bill provisions rose to two-thirds (66 percent): 1.03 million versus 1.56 million in the full-restoration scenario.

The full-restoration scenario also would have resulted in significantly higher median benefits for eligible families than did the Farm Bill restorations. In 2003, LPR/other noncitizen units with children would have been eligible for \$1,352 more in annual food stamp benefits, LPR/citizen units with children for \$722 more annually, and childless LPR/citizen units for \$161 more in the full-restoration scenario than they would have been without any restoration; these

changes in benefit levels were all substantially larger than the changes observed when comparing the partial Farm Bill restorations to the no-restoration scenario (table 18).

The same pattern held in 2004: LPR/other noncitizen units with children were eligible for \$1,345 more in annual food stamp benefits in the full-restoration than in the no-restoration simulation, LPR/citizen units for \$833 more, and childless LPR/citizen units for \$516 more. These average benefit increases were all substantially higher than in the comparison between the Farm Bill restoration and no-restoration scenarios.

### **Trends between 1999–2000 and 2003–04**

During the period of the study, eligibility rose for LPR/other noncitizen units but did not rise significantly for other unit types. The eligibility rate for LPR/other noncitizen units with children rose from 42 percent in 1999–2000 (table 13) to 52 percent in 2003–04 (table 12). LPR/other noncitizens are the group for which PRWORA’s restrictions on legal immigrant eligibility have had the greatest impact in terms of eligibility. The eligibility rate for undocumented/citizen units also rose, from 82 to 85 percent, over this period. Undocumented/citizen units have the lowest incomes of any group, and noncitizen eligibility restrictions do not apply to them since all the units have citizen members (who are usually children). The eligibility rate for LPR/citizen units with children actually declined slightly during this period (from 62 to 60 percent), a finding that is counterintuitive but can be explained by the fact that the restorations resulted in increased countable income for many adults whose eligibility was restored.

The Farm Bill restorations had more of an impact on the eligibility of low-income units without children than on units with children, as measured by the changes in eligibility rates among the affected groups between 1999–2000 and 2003–04. In 1999–2000, 33 percent of

childless LPR/citizen units were FSP eligible (table 13); this figure climbed to 43 percent by 2003–04 (table 12), an increase of 10 percentage points. Similarly, in 1999–2000 just 28 percent of LPR/other noncitizen units were eligible, but this figure increased by 17 percentage points to 45 percent in 2003–2004. The corresponding changes in eligibility for units with children were -2 percentage points for LPR/citizen units and +10 percentage points for LPR/other noncitizen units during the same period.

The Farm Bill restorations had a very large impact on mixed-eligibility rates over time, particularly among units with children. In 1999–2000, 60 percent of LPR/citizen units with children were mixed eligible; by 2003–04, this figure had dropped to 28 percent. During the same period, the mixed-eligibility rate for LPR/other noncitizen units with children decreased from 76 percent to 51 percent. The mixed eligibility rate for refugee units with children declined from 30 percent to 7 percent, but this change was not a result of the restorations. Changes in mixed-eligibility rates among childless units that contained noncitizens were more modest. The largest decline in mixed eligibility for childless units occurred among LPR/citizen units: from 45 percent to 35 percent. The mixed-eligibility rate for LPR/other noncitizen units without children decreased more modestly (from 19 percent to 17 percent), as did the rate for refugee units (from 13 percent to 11 percent).

Overall, 57 percent of eligible low-income units participated in the FSP in 2003–04, up from 51 percent in 1999–2000. Food stamp participation rates were considerably higher for eligible units with children (72 percent) than those without children (46 percent) in 2003–04. This was also true in 1999–2000, when 61 percent of eligible units with children versus 42 percent of units without children participated.



Among units with children, all-citizen units had the highest participation rate in 2003–04 (81 percent), followed by units without any citizen members (74 percent) and refugee units (62 percent). Participation rates for LPR/citizen units and undocumented/citizen units were markedly lower, at 47 and 36 percent, respectively. All-citizen units had the highest participation rate in 1999–2000 as well (68 percent), but this was 13 percentage points lower than the corresponding figure for 2003–04. Refugee units participated at a rate of 52 percent in 1999–2000, a figure 10 percentage points lower than the 2003–04 rate. LPR/other noncitizen units had a 48 percent participation rate in 1999–2000, followed by LPR/citizen units (36 percent) and undocumented/citizen units at 24 percent. The participation rates for these three groups were 26, 11, and 12 percentage points higher, respectively, in 2003–04 than in 1999–2000.

Childless units had lower participation rates: only 46 percent of low-income eligible all-citizen units participated in 2003–04. This rate was only slightly higher than the 1999–2000 participation rate of 42 percent among childless units. Refugee units had the highest participation rate among childless units in 2003–04 (80 percent), followed by LPR/other noncitizen units (57 percent) and LPR/citizen units (53 percent). This was the same ordering as in 1999–2000, when 71 percent of childless refugee units, 61 percent of LPR/other noncitizen units, and 53 percent of LPR/citizen units participated in the FSP.

Overall, in 2003–04 mixed-eligibility units participated in the FSP at lower rates than units where everyone was eligible (42 percent versus 59 percent). This finding suggests, again, that mixed-eligible units may be less likely to participate because they anticipate lower benefits. Alternatively, noncitizen units with eligible children and ineligible adults may not realize that the children are eligible. Noncitizen adults in these units may be deterred from participating for other reasons, such as fear of immigration consequences. This may explain why the participation rate

is lower for mixed-citizenship units with children than for units without children, in which there is always at least one eligible adult.

### ***Decomposition of FSP Participation Trends***

Decomposition of the change in participation among eligible units with children allows us to separate the effects of the changes in mixed eligibility and unit type from the changes in use rates within each category. The unit-type effect is negative (-1.8 percent), while the mixed-eligibility effect is positive but extremely small (0.1 percent): the combination of both these effects reduces the overall participation rate (table 20). The use-rate effect, which is positive, shows the change in the participation rate with unit type and mixed eligibility standardized. This can be thought of as the “true” change in the participation rate—what the change would have been without the changes in the distribution among unit types and the mixed-eligibility rates.

The most important trend is the trend toward the larger share of noncitizen units—from 20 to 24 percent between 1999–2000 and 2003–04 (table 19). Since noncitizen units participate at lower rates than citizen units, their increased share of the total eligible population brought down the trends in participation. Without this increase in the share of noncitizen units, FSP participation would have increased 12.9 percentage points, instead of the actual 11.3 percentage points (table 20).

The use rate effect thus accounts for 115 percent of the observed change, while the change in unit types accounts for -16 percent and the change in mixed eligibility accounts for +2 percent. To put things another way, the increase in the FSP participation rate for low-income eligible units would have been 15 percent larger if it were not for the other two effects. Thus, examining changes in the participation rate without standardizing for the unit type and mixed-

eligibility effects may understate the impact of policy changes that have encouraged and increased FSP participation in recent years. Further, our decomposition results suggest that the growing share of units including ineligible noncitizens is significantly slowing the rate of increase in overall FSP participation. A full restoration of LPR eligibility, as in our alternative simulation, would likely further increase FSP participation overall.

## **Regression Analysis of Food Stamp Participation among Eligible Units**

### ***Regression Analysis of Food Stamp Participation for 2003–04***

We conducted logistic regression to explain the various factors affecting food stamp participation in 2003–04. For our regression models we limited the sample to low-income units that were eligible for the FSP according to the TRIM3 baseline simulations. The dependent variable in all models was FSP participation during any month in 2003–04.

The regressions consisted of four models, each building on the previous model. In the first model, we considered only the citizenship and legal status of the members of eligible food stamp units. We used the same citizenship and legal status categories that we use throughout this report but also subdivided some categories into mixed-status versus all-eligible units. The result was a nine-category classification:

1. All-citizen units where all members were eligible (the reference group)
2. All-citizen units with mixed eligibility
3. LPR/citizen units with all members eligible
4. LPR/citizen units with mixed eligibility
5. LPR/other noncitizen units with all members eligible
6. LPR/other noncitizen units with mixed eligibility
7. Refugee units with all members eligible
8. Refugee units with mixed eligibility
9. Undocumented/citizen units with mixed eligibility<sup>5</sup>

---

<sup>5</sup> There are no units composed of both undocumented and citizen members that are all eligible for the FSP because undocumented immigrants are ineligible for the program.

Model 1 results suggest that noncitizen units—with the exception of refugee units—generally had lower participation rates than all-citizen units in 2003–04 (table 21). Three types of units that contained noncitizens had lower FSP participation than all-citizen units where everyone was eligible: LPR/citizen units with mixed eligibility (odds ratio of 0.499), LPR/citizen units with all members eligible (odds ratio of 0.725), and undocumented/citizen units with mixed eligibility (odds ratio of 0.396). All-citizen units with mixed eligibility also had lower odds of participation (0.718) than citizen units where everyone was eligible. Thus, the lowest participation rate occurred among undocumented/citizen units, possibly because undocumented immigrants are most likely to be fearful of participating in the FSP and least likely to know about the program or its eligibility rules.

By contrast, refugee units with all members eligible were more likely to participate than all-citizen units (odds ratio of 1.780). Mixed-eligible refugee units were less likely to participate than all-citizen, all-eligible units, but the odds ratio for this group was not statistically significant. It is not surprising that all-eligible refugee units participated at higher rates, considering they are resettled with government assistance and often remain linked to federally funded social service agencies—for instance for employment and education services—during their first several years in the United States.

In model 2, we controlled for a number of unit characteristics that might influence FSP participation, and the inclusion of these controls further widened gaps in participation among units with different legal status and mixed-eligibility configurations. Our second model took into account such characteristics as TANF and SSI receipt, the amount of earned income, the amount of food stamp benefits for which the unit was eligible, the presence of children and elders in the unit, and whether the unit was a single-parent unit. When controlling for these characteristics,

four of the six noncitizen units with statistically significant coefficients were less likely to participate than all-citizen fully eligible units, and by wider margins than in the first model without the controls. Between the first and second models, odds ratios fell for LPR/citizen units with mixed eligibility (from 0.499 to 0.256), refugee units with mixed eligibility (from 0.800 to 0.263—the odds ratio in model 1 was not statistically significant), and undocumented/citizen units with mixed eligibility (from 0.396 to 0.239). The odds ratio also fell for LPR/citizen units where all members were eligible (from 0.725 to 0.410). The two remaining noncitizen groups with statistically significant coefficients were LPR/other noncitizen units, both the mixed- and all-eligible categories. Both these groups were more likely to participate than the reference group in model 1 (although neither coefficient was statistically significant in model 1), and they became even more likely than all-citizen all-eligible units to participate in model 2. The odds ratio for LPR/other noncitizen units with mixed eligibility increased from 1.36 to 1.61, and the odds ratio for all-eligible LPR/other noncitizen units increased from 1.04 to 1.466.

The results of model 2 suggest that most types of noncitizen units—including LPR/citizen units with either mixed or universal eligibility—are less likely to participate in the FSP, even when controlling for receipt of other benefits, the amount of benefits for which they are eligible, and other factors. These results suggest that other explanations beyond benefit allocations and unit economic circumstances may be driving their participation rates lower. These other factors may include fears about immigration consequences of benefit receipt, misunderstandings about program rules—notwithstanding any outreach about the restorations—and language or cultural barriers (Holcomb et al. 2003).

In model 2, the only groups with higher participation rates than fully eligible all-citizen units were LPR/other noncitizen units with mixed eligibility (odds ratio 1.608), LPR/other

noncitizen units with all members eligible (odds ratio 1.466), and refugee units with all members eligible (odds ratio 1.334).

In model 3, we added a group of state-related variables representing whether the unit members resided in one of the four states with the largest immigrant populations (California, New York, Florida, and Texas) and interacted these four states with the legal status and mixed-eligibility configurations in the previous models. The New York and Florida variables had virtually no impact on the model, so we omitted them from the final version.<sup>6</sup>

The most notable finding in model 3 was that undocumented/citizen units in California were considerably more likely to participate than undocumented/citizen units in the other 48 states and the District of Columbia. The participation odds of undocumented/citizen units were 2.8 times as high in California as in the other 48 states plus the District of Columbia.<sup>7</sup> The difference in California is particularly striking because it does not seem to be due to higher participation across all groups: the odds of participation among the reference group, all-citizen units with universal eligibility, were lower in California (0.265) than in the rest of the country.

Further, once units living in California and Texas were excluded, the odds ratio for undocumented/citizen units versus all-citizen all-eligible units living in the other states dropped to 0.149. This finding suggests that there must have been factors in the policy environment in California that encouraged units with undocumented adults and citizen children to participate at greater rates than elsewhere in the United States. The large size and relative longevity of the undocumented—mostly Mexican-origin—population in these two states may be part of the

---

<sup>6</sup> We also introduced into the model a variable controlling for residence in a state with a state-funded program to provide food stamps to legal immigrants who were ineligible for the FSP because of PRWORA restrictions. The impact of these variables did not differ much from the impact of the set of variables for California, because California was by far the largest of the states that provided state-funded benefits.

explanation. For instance, food stamp offices in California may have been more likely than offices in other states to provide Spanish-language interpretation and to explain the rules surrounding FSP eligibility and potential immigration consequences to their clients.

Other statistically significant findings in model 3 were that eligible LPR/citizen units with mixed eligibility in Texas were 1.8 times more likely than those in the other 48 states and the District of Columbia to participate in the FSP. Also, LPR/other noncitizen units where everyone is eligible in California were considerably less likely than their counterparts in the other states (excluding Texas) to participate (odds ratio of 0.12). Inserting the state-level controls also heavily influenced the coefficient for LPR/other noncitizen units overall, making the odds ratio 2.5 times higher than that for all-citizen, all-eligible units.

Finally, in model 4, we controlled for the effects of state-level economic conditions (unemployment and median income) and immigrant-related demographic traits (foreign-born population share and growth). This final step had a negligible effect on the model; the coefficients for each new variable were small, and the odds ratios were very close to unity. The coefficients and odds ratios for the unit citizenship/legal status terms and the interaction terms for California and Texas were barely affected by the introduction of these new controls. This suggests that the differences in results between California and the rest of the country were driven by FSP policy and program administration differences, rather than measured demographic or economic differences. Further, our overall results showing lower program participation among units with noncitizen than all-citizen members—with the exception of refugees—were not strongly influenced by economic differences among the states.

---

<sup>7</sup> The odds ratios in California and Texas were calculated using the formula  $\exp(\beta_2 + \beta_{12})$ , where  $\beta_2$  is the coefficient of the state residency (CA or TX) variable and  $\beta_{12}$  is the coefficient of the undocumented citizen unit with mixed eligibility  $\times$  state residency interaction term.

In sum, undocumented/citizen status (with mixed eligibility) exerted the largest downward push on overall participation, but in California, such units were significantly more likely to participate in the FSP than their counterparts in other states. LPR/citizen units—those most likely to be affected by the Farm Bill restorations—were also less likely to participate than all citizen all-eligible units (odds ratio of 0.361 in model 4), all else equal. But this phenomenon was not true in Texas, where such units were more likely to participate than those in the other 48 states and the District of Columbia (odds ratio of 1.6 in model 4).

### ***Regression Analysis Results for 1999–2000 versus 2003–04***

This second set of regressions (table 22) is similar but includes data from two periods (1999–2000 and 2003–04) and a coefficient ( $t_2$ ) to describe differences between these two periods.

In the first model, we considered the legal status and mixed eligibility characteristics of eligible food stamp units during 1999–2000 and 2003–04 and included interactions between these characteristics and the second period ( $t_2$ ). Controlling for the period did not change most of the participation patterns that were observed in the previous regressions. As before, undocumented/citizen units with mixed eligibility (odds ratio of 0.296), LPR/citizen units with mixed eligibility (odds ratio of 0.569) and LPR/citizen units in which all members were eligible (odds ratio of 0.554) were all less likely to participate in the food stamp program than all-citizen units where all members are eligible, with undocumented/citizen units with mixed eligibility the least likely to participate among these groups. Also as earlier in the single point in-time regressions, refugee units with all members eligible (odds ratio of 1.463) and legal/noncitizen units with all members eligible (odds ratio of 1.434) were more likely than all citizen, all eligible units to participate in the FSP in the two-period regression.



The incorporation of interactions between our citizenship/legal status groups and time shows some significant upward trends for certain groups. For instance, undocumented/citizen units with mixed eligibility were much more likely to receive food stamps in 2003–04 than in 1999–2000 (odds ratio of 1.7).<sup>8</sup> The same was true for LPR/citizen units with all members eligible, whose participation odds increased by 69 percent between the two periods. The participation odds for LPR/other noncitizen units with all members eligible, on the other hand, decreased slightly, by 6 percent. The reduction in participation among LPR/other noncitizens would seem to contradict the positive impact of the Farm Bill restorations; however, other characteristics were not taken into account in this first regression model.

Our second model took into account various other characteristics, such as whether the unit received TANF or SSI and whether the unit was headed by a single parent. Once these factors were controlled for, the trends observed in model 1 became even more pronounced; positive coefficients tended to become more positive, while negative coefficients became more negative. The odds ratios for LPR/other noncitizen units with mixed eligibility (0.609), LPR/citizen units with mixed eligibility (0.365), undocumented/citizen units with mixed eligibility (0.244), and legal citizen units with all members eligible (0.540) all decreased; the odds ratio for LPR/other noncitizen units with all members eligible jumped to 2.203, up from 1.434. The time effect also became more prominent, the odds ratio increasing from 1.293 to 1.479. No legal status by time interaction was statistically significant (at the 5 percent level) in both models 1 and 2, but the odds ratio for mixed-eligible LPR/other noncitizen units in 2003–04 increased from 1.561 to 2.994; this trend makes sense in the context of the restorations. The odds

---

<sup>8</sup> This odds ratio was calculated using the formula  $\exp(\beta_2 + \beta_{12})$ , where  $\beta_2$  is the coefficient of the second period ( $t_2$ ) variable and  $\beta_{12}$  is the coefficient of the undocumented/citizen mixed eligibility  $\times t_2$  interaction term.

ratio for all-eligible LPR/other noncitizen units actually decreased from 0.727 to 0.632 between models 1 and 2. Both model 1 terms were statistically significant at reasonable levels (11 and 8 percent, respectively), and both terms were statistically significant at the 5 percent level or less in model 2. It is also worth mentioning how heavily TANF and SSI participation affected the tendency of a unit to participate; the odds ratios for both terms exceeded 7.

The third model introduced terms to account for the interactions between state, legal status/mixed eligibility and period ( $t_2$ ). As in model 3 of the 2003–04 regressions, undocumented/citizen units with mixed eligibility in California were more likely to receive food stamps than similar units in the rest of the country. However, the odds ratio of undocumented/citizen units with mixed eligibility in California relative to undocumented/citizen units with mixed eligibility in other states went down considerably once the time interaction term was introduced. In the regressions for 2003–04 only, this odds ratio was 2.81, but when period was controlled for, it decreased to 1.16.<sup>9</sup> Texas experienced the opposite effect: in the 2003–04 regressions, undocumented/citizen units were slightly less likely to participate than those in the other states (excluding California), with an odds ratio of 0.964. Once period was controlled for, the odds ratio for such units increased to 1.59.

The most significant finding in model 3 was that undocumented/citizen units with mixed eligibility in California were much more likely to receive food stamps in 2003–04 than they were in 1999–2000: the odds of undocumented/citizen units with mixed eligibility in California receiving food stamps during 2003–04 were 6.8 times greater than the odds of undocumented/citizen units with mixed eligibility in California receiving food stamps in 1999–

---

<sup>9</sup> Both these odds ratios were calculated using the formula  $\exp(\beta_2 + \beta_{12})$ , where  $\beta_2$  is the coefficient of the California resident variable and  $\beta_{12}$  is the coefficient of the undocumented citizen unit with mixed eligibility  $\times$  California interaction term.

2000.<sup>10</sup> It could be that extensive outreach, funded during the implementation of California's Healthy Families/Medi-Cal for Children expansion, resulted in the enrollment of many citizen children in undocumented families in other benefits such as food stamps. Starting in 2001, California created its Certified Application Assistance program and also made numerous significant grants to community based organizations—including many in immigrant communities—to enroll people in Healthy Families (California's State Children's Health Insurance Program) and Medi-Cal (Hill and Hawkes 2002). It is possible that these efforts to enroll citizen children in health insurance may have also helped fuel FSP enrollment.

No such comparison could be made in Texas, since none of the three-way interactions between state, unit legal status, and time were statistically significant in this model.

Another important finding was the fact that mixed-eligible LPR/other noncitizen units in 2003–04 were considerably more likely than their 1999–2000 counterparts to receive food stamps (odds ratio 2.04), meaning such units participate at higher rates following the restorations, even after controlling for residence in California, Texas, or the rest of the country.<sup>11</sup> As in the 2003–04 regressions, the introduction of state-level variables to control for economic conditions and the growth and size of the foreign-born population in model 4 had very little effect on the results, once again indicating that overall economic conditions did not strongly influence the changes in food stamp participation that we observed during 1999–2004. Instead,

---

<sup>10</sup> This odds ratio was calculated using the formula  $\exp(\beta_3 + \beta_{13} + \beta_{123})$ , where  $\beta_3$  is the coefficient of the second period ( $t_2$ ) variable,  $\beta_{13}$  is the coefficient of the undocumented citizen unit with mixed eligibility  $\times t_2$  interaction term, and  $\beta_{123}$  is the coefficient of the undocumented citizen unit w/mixed eligibility  $\times$  California  $\times t_2$  interaction term.

<sup>11</sup> This odds ratio was calculated using the formula  $\exp(\beta_2 + \beta_{12})$ , where  $\beta_2$  is the coefficient of the second period ( $t_2$ ) variable and  $\beta_{12}$  is the coefficient of the LPR/other noncitizen mixed-eligible  $\times t_2$  interaction term.

the Farm Bill restorations along with FSP policy changes to simplify procedures appear to have accounted for most of the increase in participation among the eligible population.

## **Conclusion**

The Farm Bill restorations represented a major reversal of the policy of restricting legal immigrants' eligibility for public benefits that was legislated by the 1996 welfare reform law. Estimates by the Food and Nutrition Service before the Farm Bill's implementation suggested that about 400,000 legal immigrants would become eligible and participate in the Food Stamp Program on account of the restorations. Our estimates, based on eligibility simulations using TRIM3, are that about 1 million LPRs became eligible on account of the restorations in 2004. We also estimate that about three-quarters of the LPRs made eligible by the restorations participated in the FSP in 2004. The number of newly participating individuals (779,000) was almost twice the original estimate by FNS (400,000).

At the family level, the restorations' impact appears to be smaller—just 140,000 more family units were eligible under the restorations than would have been eligible otherwise. This is because about half the LPRs whose eligibility was restored lived in mixed-eligible units, where at least one family member would have been eligible even without restorations. In other words, about half the impact of the restorations resulted from increases in the number of family units that were eligible, while the other half resulted from increases in the number of eligible LPRs *within already-eligible families*. In fact, one of the most important impacts of the restoration was to increase the amount of benefits for which LPR families were eligible. In 2004, for instance, the average family with children that included both LPRs and citizens was eligible for \$662 more in annual food stamp benefits with the restorations than without them. Thus, the restorations

increased the amount of assistance to many citizen children living in families with noncitizen adults.

Our simulations may somewhat overestimate the impact of the Farm Bill restorations because we did not model sponsor deeming rules, but the degree of overestimation is likely to be minimal. Deeming rules only apply to immigrants admitted to the United States after December 1997, when legally binding affidavits of support took effect. By 2003 and 2004, very few LPRs had been in the country since December 1997 and accumulated five years of U.S. residency, enough to qualify for the largest of the Farm Bill restorations. In addition, if recent estimates by Mathematic Policy Research are correct, then only up to 30 percent of low-income LPRs who entered the United States after December 1997 are potentially subject to sponsor-deeming rules because they have sponsors living outside their households. If some LPRs qualified for and took the indigent exemption, then the potential reduction in the number of eligible LPRs due to deeming would be even smaller. Better understanding of how states apply sponsor deeming rules, and how information from the CPS and other data sources can be used to distinguish those subject to sponsor deeming from those exempt from it, would improve our ability to estimate the impact of the remaining restrictions on noncitizen eligibility for the FSP.

Our eligibility models also did not consider state-level programs that replaced federally-funded food stamps with comparable state-funded benefits. In 2002, before the restorations, eight states extended food stamps or similar benefits to all or virtually all LPRs ineligible for the federal FSP: California, Connecticut, Maine, Massachusetts, Minnesota, Nebraska, Washington, and Wisconsin. Six other states had more limited programs. California's program alone served over 90,000 people and cost over \$6 million monthly (Schwartz and Haywood 2002). By 2004, only six states still had major replacement programs, and one state had a more limited program;

California's program participation dropped to 20,000 a month (Food and Nutrition Service 2004). Many states dropped or scaled back their programs following the restorations. As a result, the restorations also significantly affected the budgets of several states by lowering the number of LPRs receiving state-funded benefits.

Notwithstanding the nuances of deeming rules and state-funded programs, the Farm Bill restorations still left a significant group of LPRs (about 500,000) ineligible for the FSP. By 2004, the restorations had affected about two-thirds of all the LPRs rendered ineligible by the 1996 welfare reform law rules and not covered by the restorations in 1998. All LPR children became eligible for the program regardless of length of residency—a broader eligibility rule than for TANF, Medicaid, or State Children's Health Insurance Program—but LPR adults who were sponsored or lived in the United States for less than five years remained ineligible unless they entered as refugees, were granted asylum, had military service, worked 40 quarters, or met other limited exceptions.

A full restoration to all LPR adults would thus result in a substantial further increase in FSP participation. A full restoration would also, like the Farm Bill restoration, further increase the benefit amounts available to support U.S. citizen children in many immigrant families. In fact, our estimate is that a restoration to all LPR adults would have increased the average annual benefit for families with LPR adults and U.S. citizen children by \$833, versus \$622 for the Farm Bill restorations as implemented. Thus, the Farm Bill restored about three-quarters of the average benefits lost by U.S. citizen children in these mixed-status families.

Finally, it is worth noting that the Farm Bill restorations were implemented during great increases in food stamp participation overall. In most states, there were significant eligibility expansions—including transitional eligibility from TANF and reductions in vehicle and other

resource limitations—between 1999 and 2004, the period of the study. There were also many different simplification and outreach efforts that increased participation among eligible families during this time (Food and Nutrition Service 2004). These efforts, alongside economic changes, resulted in a substantial expansion of the FSP overall: an increase in total participation of about 50 percent between fiscal years 2000 and 2005. Our estimate is that the participation rate among eligible low-income eligible families increased 11 percentage points between 1999 and 2004, and that this increase would have been 13 percentage points had the share of noncitizens among FSP-eligible families not been growing so quickly. In this context of a rapidly growing caseload, the Farm Bill restorations had an even greater impact than anticipated.

## References

- Borjas, George. 2001. "Food Insecurity and Public Assistance." Joint Center for Poverty Research Working Paper 243. Chicago, IL: Northwestern University and University of Chicago.
- Capps, Randy. 2001. "Hardship among Children of Immigrants: Findings from the 1999 National Survey of America's Families." *Assessing the New Federalism* Policy Brief B-29. Washington, DC: The Urban Institute.
- Capps, Randy, Jeffrey S. Passel, and Everett Henderson. 2004. "Food Stamp Use by Legal Immigrants before and after the 2003 Restorations: Methodology and Baseline Report." Preliminary Report to U.S. Department of Agriculture, Economic Research Service. Washington, DC: The Urban Institute.
- Capps, Randy, Robin Koralek, Katherine Lotspeich, Michael Fix, Pamela Holcomb, and Jane Reardon Anderson. 2004. "Assessing Implementation of the 2003 Farm Bill Legal Immigrant Food Stamp Restorations." Final Report to the U.S. Department of Agriculture, Food and Nutrition Service. Washington, DC: The Urban Institute.
- Das Gupta, Prithwis. 1993. *Standardization and Decomposition of Rates: A User's Manual*. Current Population Report P23-186. Washington, DC: U.S. Bureau of the Census.
- Fix, Michael, and Jeffrey S. Passel. 2002. "The Scope and Impact of Welfare Reform's Immigrant Provisions." *Assessing the New Federalism* Discussion Paper 02-03. Washington, DC: The Urban Institute.
- Fix, Michael, Wendy Zimmermann, and Jeffrey S. Passel. 2001. "The Integration of Immigrant Families in the United States." *Immigration Studies* Research Report. Washington, DC: The Urban Institute.
- Food and Nutrition Service. 2003. "Eligibility Determination Guidance: Noncitizen Eligibility Requirements in the Food Stamp Program" (Letter to Food Stamp Program Regional Directors). Washington, DC: U.S. Department of Agriculture. Available at [http://www.fns.usda.gov/fsp/rules/Legislation/2002\\_farm\\_bill/memo\\_non\\_citizen\\_elg03.htm](http://www.fns.usda.gov/fsp/rules/Legislation/2002_farm_bill/memo_non_citizen_elg03.htm).
- . 2004. *Food Stamp Program State Options Report*. 4th ed. Washington, DC: U.S. Department of Agriculture.
- . 2008. "Food Stamp Program Participation and Costs" (Data as of March 26, 2008). Washington, DC: U.S. Department of Agriculture. Available at <http://www.fns.usda.gov/pd/fssummar.htm>.
- Giannarelli, Linda, Paul Johnson, Joyce Morton, and Laura Wheaton. 2001. "The TRIM3 Microsimulation Model." In *Estimating Eligibility and Participation for the WIC Program, Phase I Report*, edited by Michele Ver Ploeg and David M. Betson. Washington, DC: National Academy Press.
- Hill, Ian, and Corinna Hawkes. 2002. *Congressionally Mandated Evaluation of the State Children's Health Insurance Program Site Visit Report: The State of California's*



- Healthy Families Program*. Washington DC: U.S. Department of Health and Human Services, The Office of the Assistant Secretary for Planning and Evaluation.
- Holcomb, Pamela, Robin Koralek, Karen Tumlin, Randy Capps, and Anita Zuberi. 2003. "The Application Process for Public Benefits: Complexities and Challenges Facing Immigrants and Limited English Speakers." Washington, DC: U.S. Department of Health and Human Services, Assistant Secretary for Planning and Evaluation.
- Passel, Jeffrey S., and Rebecca Clark. 1998. "Identifying Legal and Illegal Immigrants in the Census and Current Population Surveys: A New Technique Based on the Occupational Distribution of Illegal Aliens—An Example Using Data from New York State." Presented at the annual meeting of the Population Association of America.
- Passel, Jeffrey S., Jennifer Van Hook, and Frank D. Bean. 2004. "Estimates of Legal and Unauthorized Foreign-Born Population for the United States and Selected States, Based on Census 2000." Report to the Census Bureau. Washington, DC: The Urban Institute. Available at [http://www.sabresys.com/i\\_whitepapers.asp](http://www.sabresys.com/i_whitepapers.asp).
- Schwartz, Sonya, and Brad Haywood. 2002. "Opportunities to Maximize the Effects of Immigrant Restorations in the Food Stamp Reauthorization of 2002 by Preserving and Increasing State Food Stamp Replacement Programs for Immigrants." Washington, DC: Food Research and Action Center. Available at [www.frac.org/html\\_new/food\\_stamps/legal\\_immigrants/Opportunities.PDF](http://www.frac.org/html_new/food_stamps/legal_immigrants/Opportunities.PDF).
- Wheaton, Laura, and Linda Giannarelli. 2000. "Underreporting of Means Tested Transfer Programs in the March CPS." In *Proceedings of the Section on Government Statistics and Section on Social Statistics*. Alexandria, VA: American Statistical Association.
- Wolkwitz, Karen. 2007. "Trends in Food Stamp Participation Rates: 1999 to 2005." (Report to USDA Food and Nutrition Service.) Washington, DC: Mathematica Policy Research, Inc. Available at <http://www.fns.usda.gov/oane/menu/Published/FSP/FILES/Participation/Trends1999-2005.pdf>.

**Table 1.**  
**Number of Units (Unweighted)**  
**by Income Level, Unit Legal Status, and Presence of Children:**  
**March 2004–05 CPS (Calendar Years 2003–04)**

Status of Unit and Presence of Children	March 2004 CPS				March 2005 CPS			
	US Units		CA Units		US Units		CA Units	
	All	Low-income	All	Low-income	All	Low-income	All	Low-income
All Units	78,361	25,628	5,579	2,049	77,704	25,979	6,065	2,268
<b>Units with Children</b>	<b>34,695</b>	<b>11,478</b>	<b>2,664</b>	<b>1,071</b>	<b>34,046</b>	<b>11,514</b>	<b>2,777</b>	<b>1,155</b>
All Citizens	29,946	8,860	1,616	436	29,385	8,982	1,683	495
LPR/Citizen	2,525	1,215	649	358	2,532	1,196	681	365
Undocumented/Citizen	1,391	916	264	187	1,303	870	257	185
LPR/Other Noncitizen	205	132	44	33	197	124	51	34
All Undocumented	408	248	60	42	425	247	80	61
Refugee	220	107	29	15	205	95	26	14
<b>Units without Children</b>	<b>43,666</b>	<b>14,150</b>	<b>2,915</b>	<b>978</b>	<b>43,658</b>	<b>14,465</b>	<b>3,289</b>	<b>1,114</b>
All Citizens	40,534	12,759	2,342	692	40,471	13,112	2,676	814
LPR/Citizen	1,010	295	190	73	1,008	277	207	77
Undocumented/Citizen	142	65	31	10	151	68	25	12
LPR/Other Noncitizen	782	430	188	117	795	411	218	123
All Undocumented	1,027	516	139	74	1,034	508	140	80
Refugee	171	84	25	12	199	89	22	8

Source: Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04 which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

Notes: Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).  
See text for definitions of unit status types and eligibility definition.  
A small number of units (three in 2003 and two in 2004) were unable to be classified into these groups and was excluded from these totals.

**Table 2.**  
**Low-Income Units Eligible for and Receiving Food Stamps,**  
**by Unit Legal Status and Presence of Children**  
**Baseline Simulation**  
**March 2004 CPS (Calendar Year 2003)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed-Eligibility Units		Units Receiving Food Stamps	
		Number (000s)	Pct. of units	Number (000s)	Pct. of eligibles	Number (000s)	Pct. of eligibles
All Units	37,228	19,783	53%	1,847	9%	10,668	54%
<b>Units with Children</b>	<b>14,034</b>	<b>8,670</b>	<b>62%</b>	<b>1,413</b>	<b>16%</b>	<b>6,063</b>	<b>70%</b>
All Citizens	10,587	6,536	62%	130	2%	5,189	79%
LPR/Citizen	1,650	996	60%	287	29%	457	46%
Undocumented/Citizen	1,144	974	85%	974	100%	312	32%
LPR/Other Noncitizen	182	65	36%	21	32%	43	66%
All Undocumented	333	0	--	0	(x)	0	(x)
Refugee	139	98	70%	1	1%	62	63%
<b>Units without Children</b>	<b>23,194</b>	<b>11,114</b>	<b>48%</b>	<b>433</b>	<b>4%</b>	<b>4,605</b>	<b>41%</b>
All Citizens	21,063	10,497	50%	269	3%	4,288	41%
LPR/Citizen	469	207	44%	77	37%	94	45%
Undocumented/Citizen	89	31	35%	31	100%	10	32%
LPR/Other Noncitizen	686	315	46%	53	17%	166	53%
All Undocumented	752	0	--	0	(x)	0	(x)
Refugee	135	63	46%	2	3%	47	75%

-- Zero.

(x) Not applicable.

*Source:* Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

*Notes:* Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 3.**  
**Low-Income Units Eligible for and Receiving Food Stamps,**  
**by Unit Legal Status and Presence of Children**  
**All-LPRs-Eligible Simulation**  
**March 2004 CPS (Calendar Year 2003)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Number (000s)	Pct. of units	Number (000s)	Pct. of eligibles	Number (000s)	Pct. of eligibles
All Units	37,228	19,911	53%	1,649	8%	10,825	54%
<b>Units with Children</b>	<b>14,034</b>	<b>8,722</b>	<b>62%</b>	<b>1,244</b>	<b>14%</b>	<b>6,137</b>	<b>70%</b>
All Citizens	10,587	6,536	62%	130	2%	5,189	79%
LPR/Citizen	1,650	1,000	61%	124	12%	483	48%
Undocumented/Citizen	1,144	974	85%	974	100%	312	32%
LPR/Other Noncitizen	182	113	62%	14	12%	91	81%
All Undocumented	333	0	--	0	(x)	0	(x)
Refugee	139	98	70%	1	1%	62	63%
<b>Units without Children</b>	<b>23,194</b>	<b>11,190</b>	<b>48%</b>	<b>406</b>	<b>4%</b>	<b>4,688</b>	<b>42%</b>
All Citizens	21,063	10,497	50%	269	3%	4,288	41%
LPR/Citizen	469	217	46%	58	27%	110	51%
Undocumented/Citizen	89	31	35%	31	100%	10	32%
LPR/Other Noncitizen	686	381	56%	45	12%	232	61%
All Undocumented	752	0	--	0	(x)	0	(x)
Refugee	135	63	46%	2	3%	47	75%

-- Zero.

(x) Not applicable.

*Source:* Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

*Notes:* Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 4.**  
**Simulation of Low-Income Units Eligibility for and Receipt of Food Stamps,**  
**by Unit Legal Status and Presence of Children**  
**with No Legal Immigrant Restrictions Removed:**  
**March 2004 CPS (Calendar Year 2003)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Number (000s)	Pct. of Units	Number (000s)	Pct. of Eligibles	Number (000s)	Pct. of Eligibles
All Units	37,228	19,668	53%	2,196	11%	10,586	54%
<b>Units with Children</b>	<b>14,034</b>	<b>8,677</b>	<b>62%</b>	<b>1,762</b>	<b>20%</b>	<b>6,055</b>	<b>70%</b>
All Citizens	10,587	6,536	62%	130	2%	5,189	79%
LPR/Citizen	1,650	1,022	62%	606	59%	467	46%
Undocumented/Citizen	1,144	974	85%	974	100%	312	32%
LPR/Other Noncitizen	182	44	24%	22	51%	25	55%
All Undocumented	333	0	--	0	(x)	0	(x)
Refugee	139	100	72%	29	30%	63	63%
<b>Units without Children</b>	<b>23,194</b>	<b>10,991</b>	<b>47%</b>	<b>435</b>	<b>4%</b>	<b>4,531</b>	<b>41%</b>
All Citizens	21,063	10,497	50%	269	3%	4,288	41%
LPR/Citizen	469	203	43%	103	51%	94	46%
Undocumented/Citizen	89	31	35%	31	100%	10	32%
LPR/Other Noncitizen	686	202	29%	28	14%	95	47%
All Undocumented	752	0	--	0	(x)	0	(x)
Refugee	135	57	42%	3	5%	44	77%

-- Zero.

(x) Not applicable.

*Source:* Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

*Notes:* Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 5.**  
**Simulated Differences in Low Income Units Eligible for and Receiving Food Stamps**  
**between Baseline and No-Restoration Scenarios,**  
**by Unit Legal Status and Presence of Children**  
**March 2004 CPS (Calendar Year 2003)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Absolute change (000s)	Pct. point change	Absolute change (000s)	Pct. point change	Absolute change (000s)	Pct. point change
All Units	37,228	87	0%	-347	2%	71	0%
<b>Units with Children</b>	<b>14,034</b>	<b>-26</b>	<b>0%</b>	<b>-347</b>	<b>4%</b>	<b>0</b>	<b>0%</b>
All Citizens	10,587	--	--	--	--	--	--
LPR/Citizen	1,650	-26	-2%	-318	-30%	(z)	(z)
Undocumented/Citizen	1,144	--	--	--	--	--	--
LPR/Other Noncitizen	182	(z)	(z)	(z)	(z)	(z)	(z)
All Undocumented	333	--	--	--	--	--	--
Refugee	139	(z)	(z)	-28	-28%	(z)	(z)
<b>Units without Children</b>	<b>23,194</b>	<b>114</b>	<b>-1%</b>	<b>0</b>	<b>0%</b>	<b>71</b>	<b>0%</b>
All Citizens	21,063	--	--	--	--	--	--
LPR/Citizen	469	(z)	(z)	-26	-13%	(z)	(z)
Undocumented/Citizen	89	--	--	--	--	--	--
LPR/Other Noncitizen	686	114	17%	26	3%	71	5%
All Undocumented	752	--	--	--	--	--	--
Refugee	135	(z)	(z)	(z)	(z)	(z)	(z)

-- Zero.

(z) Change of less than 25,000 households

Source: Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

Notes: Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 6.**  
**Simulated Differences in Low Income Units Eligible for and Receiving Food Stamps**  
**between All-LPRs-Eligible and No-Restoration Scenarios,**  
**by Unit Legal Status and Presence of Children**  
**March 2004 CPS (Calendar Year 2003)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Absolute change (000s)	Pct. point change	Absolute change (000s)	Pct. point change	Absolute change (000s)	Pct. point change
All Units	37,228	248	-1%	-555	3%	204	-1%
<b>Units with Children</b>	<b>14,034</b>	<b>69</b>	<b>0%</b>	<b>-510</b>	<b>6%</b>	<b>66</b>	<b>-1%</b>
All Citizens	10,587	--	--	--	--	--	--
LPR/Citizen	1,650	(z)	(z)	-482	-47%	(z)	(z)
Undocumented/Citizen	1,144	--	--	--	--	--	--
LPR/Other Noncitizen	182	69	38%	(z)	(z)	66	25%
All Undocumented	333	--	--	--	--	--	--
Refugee	139	(z)	(z)	-28	-28%	(z)	(z)
<b>Units without Children</b>	<b>23,194</b>	<b>180</b>	<b>-1%</b>	<b>-45</b>	<b>0%</b>	<b>137</b>	<b>-1%</b>
All Citizens	21,063	--	--	--	--	--	--
LPR/Citizen	469	(z)	(z)	-45	-24%	(z)	(z)
Undocumented/Citizen	89	--	--	--	--	--	--
LPR/Other Noncitizen	686	180	26%	(z)	(z)	137	14%
All Undocumented	752	--	--	--	--	--	--
Refugee	135	(z)	(z)	(z)	(z)	(z)	(z)

-- Zero.

(z) Change of less than 25,000 households

Source: Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

Notes: Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 7.**  
**Low-Income Units Eligible for and Receiving Food Stamps,**  
**by Unit Legal Status and Presence of Children**  
**Baseline Simulation**  
**March 2005 CPS (Calendar Year 2004)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Number (000s)	Pct. of eligible	Number (000s)	Pct. of eligibles	Number (000s)	Pct. of eligibles
All Units	38,635	20,056	52%	1,976	10%	12,083	60%
<b>Units with Children</b>	<b>14,525</b>	<b>8,797</b>	<b>61%</b>	<b>1,429</b>	<b>16%</b>	<b>6,500</b>	<b>74%</b>
All Citizens	11,055	6,632	60%	113	2%	5,487	83%
LPR/Citizen	1,656	990	60%	259	26%	485	49%
Undocumented/Citizen	1,131	969	86%	969	100%	381	39%
LPR/Other Noncitizen	186	126	68%	77	61%	99	78%
All Undocumented	359	0	--	0	(x)	0	(x)
Refugee	137	81	59%	12	14%	48	60%
<b>Units without Children</b>	<b>24,110</b>	<b>11,259</b>	<b>47%</b>	<b>547</b>	<b>5%</b>	<b>5,583</b>	<b>50%</b>
All Citizens	22,001	10,651	48%	387	4%	5,184	49%
LPR/Citizen	438	179	41%	57	32%	110	61%
Undocumented/Citizen	106	41	39%	41	100%	26	64%
LPR/Other Noncitizen	665	290	44%	47	16%	182	63%
All Undocumented	759	0	--	0	(x)	0	(x)
Refugee	141	98	69%	16	17%	81	83%

-- Zero.

(x) Not applicable.

*Source:* Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

*Notes:* Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).



**Table 8.**  
**Low-Income Units Eligible for and Receiving Food Stamps,**  
**by Unit Legal Status and Presence of Children**  
**All-LPRs-Eligible Simulation**  
**March 2005 CPS (Calendar Year 2004)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Number (000s)	Pct. of units	Number (000s)	Pct. of eligibles	Number (000s)	Pct. of eligibles
All Units	38,635	20,135	52%	1,739	9%	12,185	61%
<b>Units with Children</b>	<b>14,525</b>	<b>8,790</b>	<b>61%</b>	<b>1,212</b>	<b>14%</b>	<b>6,510</b>	<b>74%</b>
All Citizens	11,055	6,632	60%	113	2%	5,487	83%
LPR/Citizen	1,656	994	60%	105	11%	502	51%
Undocumented/Citizen	1,131	969	86%	969	100%	381	39%
LPR/Other Noncitizen	186	115	62%	14	12%	92	80%
All Undocumented	359	0	--	0	(x)	0	(x)
Refugee	137	81	59%	12	14%	48	60%
<b>Units without Children</b>	<b>24,110</b>	<b>11,346</b>	<b>47%</b>	<b>527</b>	<b>5%</b>	<b>5,676</b>	<b>50%</b>
All Citizens	22,001	10,651	48%	387	4%	5,184	49%
LPR/Citizen	438	179	41%	36	20%	113	64%
Undocumented/Citizen	106	41	39%	41	100%	26	64%
LPR/Other Noncitizen	665	377	57%	47	12%	270	72%
All Undocumented	759	0	--	0	(x)	0	(x)
Refugee	141	98	69%	16	17%	81	83%

-- Zero.

(x) Not applicable.

*Source:* Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

*Notes:* Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 9.**  
**Simulation of Low-Income Units Eligibility for and Receipt of Food Stamps,**  
**by Unit Legal Status and Presence of Children**  
**with No Legal Immigrant Restrictions Removed:**  
**March 2005 CPS (Calendar Year 2004)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Number (000s)	Pct. of Units	Number (000s)	Pct. of Eligibles	Number (000s)	Pct. of Eligibles
All Units	38,635	19,890	51%	2,310	12%	11,940	60%
<b>Units with Children</b>	<b>14,525</b>	<b>8,746</b>	<b>60%</b>	<b>1,751</b>	<b>20%</b>	<b>6,432</b>	<b>74%</b>
All Citizens	11,055	6,632	60%	113	2%	5,487	83%
LPR/Citizen	1,656	1,020	62%	620	61%	486	48%
Undocumented/Citizen	1,131	969	86%	969	100%	381	39%
LPR/Other Noncitizen	186	45	24%	20	45%	30	66%
All Undocumented	359	0	--	0	(x)	0	(x)
Refugee	137	81	59%	29	36%	48	60%
<b>Units without Children</b>	<b>24,110</b>	<b>11,144</b>	<b>46%</b>	<b>559</b>	<b>5%</b>	<b>5,508</b>	<b>49%</b>
All Citizens	22,001	10,651	48%	387	4%	5,184	49%
LPR/Citizen	438	165	38%	71	43%	105	64%
Undocumented/Citizen	106	41	39%	41	100%	26	64%
LPR/Other Noncitizen	665	193	29%	34	17%	112	58%
All Undocumented	759	0	--	0	(x)	0	(x)
Refugee	141	93	66%	27	29%	79	85%

-- Zero.

(x) Not applicable.

*Source:* Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

*Notes:* Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 10.**  
**Simulated Differences in Low Income Units Eligible for and Receiving Food Stamps**  
**between Baseline and No-Restoration Scenarios,**  
**by Unit Legal Status and Presence of Children**  
**March 2005 CPS (Calendar Year 2004)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Absolute change (000s)	Pct. point change	Absolute change (000s)	Pct. point change	Absolute change (000s)	Pct. point change
All Units	38,635	148	0%	-305	2%	139	0%
<b>Units with Children</b>	<b>14,525</b>	<b>51</b>	<b>0%</b>	<b>-305</b>	<b>4%</b>	<b>69</b>	<b>0%</b>
All Citizens	11,055	--	--	--	--	--	--
LPR/Citizen	1,656	-30	-2%	-361	-35%	(z)	(z)
Undocumented/Citizen	1,131	--	--	--	--	--	--
LPR/Other Noncitizen	186	81	44%	56	16%	69	13%
All Undocumented	359	--	--	--	--	--	--
Refugee	137	(z)	(z)	(z)	(z)	(z)	(z)
<b>Units without Children</b>	<b>24,110</b>	<b>97</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>70</b>	<b>0%</b>
All Citizens	22,001	--	--	--	--	--	--
LPR/Citizen	438	(z)	(z)	(z)	(z)	(z)	(z)
Undocumented/Citizen	106	--	--	--	--	--	--
LPR/Other Noncitizen	665	97	15%	(z)	(z)	70	5%
All Undocumented	759	--	--	--	--	--	--
Refugee	141	(z)	(z)	(z)	(z)	(z)	(z)

-- Zero.

(z) Change of less than 25,000 households

Source: Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

Notes: Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 11.**  
**Simulated Differences in Low Income Units Eligible for and Receiving Food Stamps**  
**between All-LPRs-Eligible and No-Restoration Scenarios,**  
**by Unit Legal Status and Presence of Children**  
**March 2005 CPS (Calendar Year 2004)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Absolute change (000s)	Pct. point change	Absolute change (000s)	Pct. point change	Absolute change (000s)	Pct. point change
All Units	38,635	227	-1%	-550	3%	220	0%
<b>Units with Children</b>	<b>14,525</b>	<b>43</b>	<b>0%</b>	<b>-515</b>	<b>6%</b>	<b>62</b>	<b>-1%</b>
All Citizens	11,055	--	--	--	--	--	--
LPR/Citizen	1,656	-26	-2%	-515	-50%	(z)	(z)
Undocumented/Citizen	1,131	--	--	--	--	--	--
LPR/Other Noncitizen	186	70	38%	(z)	(z)	62	14%
All Undocumented	359	--	--	--	--	--	--
Refugee	137	(z)	(z)	(z)	(z)	(z)	(z)
<b>Units without Children</b>	<b>24,110</b>	<b>183</b>	<b>-1%</b>	<b>-35</b>	<b>0%</b>	<b>158</b>	<b>-1%</b>
All Citizens	22,001	--	--	--	--	--	--
LPR/Citizen	438	(z)	(z)	-35	-23%	(z)	(z)
Undocumented/Citizen	106	--	--	--	--	--	--
LPR/Other Noncitizen	665	183	28%	(z)	(z)	158	14%
All Undocumented	759	--	--	--	--	--	--
Refugee	141	(z)	(z)	(z)	(z)	(z)	(z)

-- Zero.

(z) Change of less than 25,000 households

Source: Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

Notes: Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 12.**  
**Low-Income Units Eligible for and Receiving Food Stamps,**  
**by Unit Legal Status and Presence of Children**  
**Baseline Simulation**  
**Average of March 2004–05 CPS (Calendar Years 2003–04)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Number (000s)	Pct. of units	Number (000s)	Pct. of eligibles	Number (000s)	Pct. of eligibles
All Units	37,932	19,920	53%	1,911	10%	11,376	57%
<b>Units with Children</b>	<b>14,279</b>	<b>8,733</b>	<b>61%</b>	<b>1,421</b>	<b>16%</b>	<b>6,282</b>	<b>72%</b>
All Citizens	10,821	6,584	61%	121	2%	5,338	81%
LPR/Citizen	1,653	993	60%	273	28%	471	47%
Undocumented/Citizen	1,137	972	85%	972	100%	347	36%
LPR/Other Noncitizen	184	96	52%	49	51%	71	74%
All Undocumented	346	0	--	0	(x)	0	(x)
Refugee	138	89	65%	6	7%	55	62%
<b>Units without Children</b>	<b>23,652</b>	<b>11,186</b>	<b>47%</b>	<b>490</b>	<b>4%</b>	<b>5,094</b>	<b>46%</b>
All Citizens	21,532	10,574	49%	328	3%	4,736	45%
LPR/Citizen	453	193	43%	67	35%	102	53%
Undocumented/Citizen	98	36	37%	36	100%	18	50%
LPR/Other Noncitizen	676	303	45%	50	17%	174	57%
All Undocumented	756	0	--	0	(x)	0	(x)
Refugee	138	80	58%	9	11%	64	80%

-- Zero.

(x) Not applicable.

*Source:* Urban Institute tabulations from TRIM3 baseline simulations for calendar years 2003–04, which are based on March 2004 and 2005 CPS data with Urban Institute assignments of legal status.

*Notes:* Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

**Table 13.**  
**Low-Income Units Eligible for and Receiving Food Stamps,**  
**by Unit Legal Status and Presence of Children**  
**Baseline Simulation**  
**Average of March 2000–01 CPS (Calendar Years 1999–2000)**

Status of Unit and Presence of Children	Units (000s)	Units Eligible for FSP		Mixed Eligibility Units		Units Receiving Food Stamps	
		Number (000s)	Pct. of units	Number (000s)	Pct. of eligibles	Number (000s)	Pct. of eligibles
All Units	35,441	18,090	51%	1,668	9%	9,210	51%
<b>Units with Children</b>	<b>13,576</b>	<b>8,414</b>	<b>62%</b>	<b>1,396</b>	<b>17%</b>	<b>5,102</b>	<b>61%</b>
All Citizens	10,802	6,706	62%	134	2%	4,538	68%
LPR/Citizen	1,428	890	62%	532	60%	323	36%
Undocumented/Citizen	794	649	82%	649	100%	156	24%
LPR/Other Noncitizen	161	68	42%	52	76%	33	48%
All Undocumented	230	0	--	0	(x)	0	(x)
Refugee	161	100	62%	30	30%	52	52%
<b>Units without Children</b>	<b>21,865</b>	<b>9,676</b>	<b>44%</b>	<b>272</b>	<b>3%</b>	<b>4,108</b>	<b>42%</b>
All Citizens	20,013	9,249	46%	136	1%	3,856	42%
LPR/Citizen	382	125	33%	57	45%	67	53%
Undocumented/Citizen	87	33	38%	33	100%	13	39%
LPR/Other Noncitizen	629	174	28%	34	19%	105	61%
All Undocumented	576	0	--	0	(x)	0	(x)
Refugee	178	94	53%	12	13%	67	71%

-- Zero.

(x) Not applicable.

*Source:* Urban Institute tabulations from TRIM3 baseline simulations for calendar years 1999–2000, which are based on March 2000 and 2001 CPS data with Urban Institute assignments of legal status.

*Notes:* Low-income units are those with incomes below 200 percent of the federal poverty level (FPL).

See text for definitions of unit status types and eligibility definition.

A small number of units (less than 10,000) were unable to be classified into these groups and was excluded from these totals.

**Table 14:**  
**Food Stamp Unit Eligibility Transitions, 2003 (Baseline versus No Restoration)**  
**Universe: Individuals Whose Eligibility Changed due to the Restorations**

**Overall Figures**

Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>834,768</b>	<b>100%</b>
Individuals in units that...		
Became Eligible at All	354,840	42.5%
Became Fully Eligible	470,559	56.4%
Remained Mixed	104,077	12.5%
Individuals Who Lost Eligibility	94,708	-11.3%
<b>Total New Recipients</b>	<b>520,884</b>	<b>62.4%</b>

**Adults (Age 18 and Up)**

Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>814,550</b>	<b>100%</b>
Individuals in units that...		
Became Eligible at All	282,823	34.7%
Became Fully Eligible	450,308	55.3%
Remained Mixed	101,673	12.5%
Individuals Who Lost Eligibility	20,254	-2.5%
<b>Total New Recipients</b>	<b>463,689</b>	<b>56.9%</b>

**Children (Under Age 18)**

Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>20,218</b>	<b>100%</b>
Individuals in units that...		
Became Eligible at All	72,017	356.2%
Became Fully Eligible	20,251	100.2%
Remained Mixed	2,404	11.9%
Individuals Who Lost Eligibility	74,454	-368.3%
<b>Total New Recipients</b>	<b>57,195</b>	<b>282.9%</b>

**Table 15:**  
***Food Stamp Unit Eligibility Transitions, 2003 (Full versus No Restoration)***  
***Universe: Individuals Whose Eligibility Changed due to the Restorations***

***Overall Figures***

Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>1,562,556</b>	<b>100%</b>
<b>Individuals in units that...</b>		
Became Eligible at All	761,478	48.7%
Became Fully Eligible	838,077	53.6%
Remained Mixed	71,448	4.6%
<b>Individuals Who Lost Eligibility</b>	108,447	-6.9%
<b>Total New Recipients</b>	<b>1,084,050</b>	<b>69.4%</b>

***Adults (Age 18 and Up)***

Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>1,368,798</b>	<b>100%</b>
<b>Individuals in units that...</b>		
Became Eligible at All	571,400	41.7%
Became Fully Eligible	750,854	54.9%
Remained Mixed	69,269	5.1%
<b>Individuals Who Lost Eligibility</b>	22,725	-1.7%
<b>Total New Recipients</b>	<b>878,264</b>	<b>64.2%</b>

***Children (Under Age 18)***

Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>193,758</b>	<b>100%</b>
<b>Individuals in units that...</b>		
Became Eligible at All	190,078	98.1%
Became Fully Eligible	87,223	45.0%
Remained Mixed	2,179	1.1%
<b>Individuals Who Lost Eligibility</b>	85,722	-44.2%
<b>Total New Recipients</b>	<b>205,786</b>	<b>106.2%</b>



**Table 16:**  
**Food Stamp Unit Eligibility Transitions, 2004 (Baseline versus No Restoration)**  
**Universe: Individuals Whose Eligibility Changed due to the Restorations**

**Overall Figures**

Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>1,034,079</b>	<b>100%</b>
Individuals in units that...		
Became Eligible at All	528,414	51.1%
Became Fully Eligible	506,180	48.9%
Remained Mixed	124,947	12.1%
Individuals Who Lost Eligibility	125,462	-12.1%
<b>Total New Recipients</b>	<b>779,049</b>	<b>75.3%</b>
<b>Adults (Age 18 and Up)</b>		
Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>832,597</b>	<b>100%</b>
Individuals in units that...		
Became Eligible at All	319,820	38.4%
Became Fully Eligible	457,807	55.0%
Remained Mixed	78,687	9.5%
Individuals Who Lost Eligibility	23,717	-2.8%
<b>Total New Recipients</b>	<b>538,096</b>	<b>64.6%</b>
<b>Children (Under Age 18)</b>		
Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>201,482</b>	<b>100%</b>
Individuals in units that...		
Became Eligible at All	208,594	103.5%
Became Fully Eligible	48,373	24.0%
Remained Mixed	46,260	23.0%
Individuals Who Lost Eligibility	101,745	-50.5%
<b>Total New Recipients</b>	<b>240,953</b>	<b>119.6%</b>

**Table 17:**  
***Food Stamp Unit Eligibility Transitions, 2004 (Full versus No Restoration)***  
***Universe: Individuals Whose Eligibility Changed due to the Restorations***

***Overall Figures***

Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>1,564,309</b>	<b>100%</b>
<b>Individuals in units that...</b>		
Became Eligible at All	847,598	54.2%
Became Fully Eligible	811,427	51.9%
Remained Mixed	49,136	3.1%
<b>Individuals Who Lost Eligibility</b>	143,852	-9.2%
<b>Total New Recipients</b>	<b>1,204,731</b>	<b>77.0%</b>
<b><i>Adults (Age 18 and Up)</i></b>		
Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>1,364,908</b>	<b>100%</b>
<b>Individuals in units that...</b>		
Became Eligible at All	630,025	46.2%
Became Fully Eligible	724,932	53.1%
Remained Mixed	45,320	3.3%
<b>Individuals Who Lost Eligibility</b>	35,369	-2.6%
<b>Total New Recipients</b>	<b>949,368</b>	<b>69.6%</b>
<b><i>Children (Under Age 18)</i></b>		
Eligibility Transition Category	Number of Individuals	Percent of Newly Eligible
<b>Total Net Newly Eligible Individuals</b>	<b>199,401</b>	<b>100%</b>
<b>Individuals in units that...</b>		
Became Eligible at All	217,573	109.1%
Became Fully Eligible	86,495	43.4%
Remained Mixed	3,816	1.9%
<b>Individuals Who Lost Eligibility</b>	108,483	-54.4%
<b>Total New Recipients</b>	<b>255,363</b>	<b>128.1%</b>

**Table 18: Annual Median Benefit Difference Figures, 2003, 2004**  
**Universe: Low-Income Food Stamp Eligible Units**

<b>Unit Type</b>	<b>Actual Restoration Minus No Restoration</b>	<b>Full Restoration Minus No Restoration</b>
<b>2003</b>		
<b><i>Units with Children</i></b>		
All Citizens	\$0	\$0
LPR/Citizen	\$478	\$722
Undocumented/Citizen	-\$4	-\$4
LPR/Other Noncitizen	\$410	\$1,352
Refugee	\$472	\$472
<b><i>Units without Children</i></b>		
All Citizens	\$0	\$0
LPR/Citizen	\$80	\$161
Undocumented/Citizen	\$0	\$0
LPR/Other Noncitizen	\$271	\$271
Refugee	\$32	\$32
<b>2004</b>		
<b><i>Units with Children</i></b>		
All Citizens	\$0	\$0
LPR/Citizen	\$662	\$833
Undocumented/Citizen	\$0	\$0
LPR/Other Noncitizen	\$274	\$1,345
Refugee	\$344	\$344
<b><i>Units without Children</i></b>		
All Citizens	\$0	\$0
LPR/Citizen	\$365	\$516
Undocumented/Citizen	\$0	\$0
LPR/Other Noncitizen	\$154	\$154
Refugee	\$21	\$21

**Table 19: Trends in Mixed Eligibility, Citizenship, and Participation, 1999–2004**  
**Universe: Low-Income Eligible Units with Children**

<b>1999–2000</b>		
<b>Category</b>	<b>Share of Units</b>	<b>Participation Rate</b>
Same Status	83.4%	65.7%
Mixed Eligibility	16.6%	35.3%
All Citizens	79.7%	67.7%
LPR/Citizen	10.6%	36.3%
Undocumented/Citizen	7.7%	24.0%
LPR/Other Noncitizen	0.8%	48.2%
Refugee	1.2%	52.4%
All	100.0%	60.6%
<b>2001–02</b>		
<b>Category</b>	<b>Share of Units</b>	<b>Participation Rate</b>
Same Status	82.1%	68.1%
Mixed Eligibility	17.9%	37.6%
All Citizens	77.5%	70.4%
LPR/Citizen	11.6%	34.8%
Undocumented/Citizen	8.9%	31.7%
LPR/Other Noncitizen	0.6%	59.0%
Refugee	1.4%	57.8%
All	100.0%	62.6%
<b>2003–04</b>		
<b>Category</b>	<b>Share of Units</b>	<b>Participation Rate</b>
Same Status	83.7%	77.9%
Mixed Eligibility	16.3%	41.2%
All Citizens	75.4%	81.1%
LPR/Citizen	11.4%	47.5%
Undocumented/Citizen	11.1%	35.7%
LPR/Other Noncitizen	1.1%	74.2%
Refugee	1.0%	61.6%
All	100.0%	71.9%

**Table 20: Trends in Mixed Eligibility, Citizenship, and Participation, 1999–2000, 2003–04**  
**Universe: Low-Income Eligible Units with Children**

<b>Standardization</b>		
Standardized Participation Rates	1999-2000	2003-2004
Unit Type, Mixed Eligibility Standardized	59.7%	72.6%
Mixed Eligibility, Use Rates Standardized	66.9%	65.0%
Unit Type, Use Rates Standardized	66.0%	66.1%
Total Participation Rate	60.7%	71.9%
<b>Decomposition</b>		
Effects	Difference	Percent Distribution of Effects
Use Rate Effect	12.9%	114.5%
Unit Type Effect	-1.8%	-16.3%
Mixed Eligibility Effect	0.1%	1.8%
Total Trend	11.3%	100.0%

Table 21: Logistic Regression Results for Low-Income, Food Stamp–Eligible Units, March 2004 and 2005 CPS (Calendar Years 2003 and 2004)

Characteristic	Model 1		Model 2		Model 3		Model 4	
	Parameter Estimate	Odds Ratio	Parameter Estimate	Odds Ratio	Parameter Estimate	Odds Ratio	Parameter Estimate	Odds Ratio
LPR/other Noncit Unit with Mixed Eligibility	0.3083	1.361	0.4748 *	1.608	0.8463 **	2.331	1.0236 **	2.783
LPR/Cit Unit with Mixed Eligibility	-0.6951 ***	0.499	-1.3642 ***	0.256	-1.1148 ***	0.328	-1.0194 ***	0.361
Refugee Unit with Mixed Eligibility	-0.2235	0.800	-1.3344 *	0.263	11.8094	>999.9	11.8535	>999.9
Undoc/Cit Unit with Mixed Eligibility	-0.9273 ***	0.396	-1.4297 ***	0.239	-1.9023 ***	0.149	-1.8256 ***	0.161
All citizen unit with Mixed Eligibility	-0.3314 ***	0.718	-1.1381 ***	0.320	0.0582	1.060	0.0526	1.054
LPR/other Noncit Unit with all membs eligible	0.0416	1.042	0.3822 **	1.466	0.8970 ***	2.452	1.0074 ***	2.738
LPR/Cit Unit with all membs eligible	-0.3212 ***	0.725	-0.8912 ***	0.410	-0.5604 ***	0.571	-0.4462 ***	0.640
Refugee Unit with all membs eligible	0.5767 **	1.780	0.2882	1.334	0.4980 *	1.645	0.5657 **	1.761
Unit received TANF during the year			1.5611 ***	4.764	1.8487 ***	6.352	1.8650 ***	6.456
Unit received SSI during the year			1.9969 ***	7.366	2.1052 ***	8.209	2.1237 ***	8.362
FS benefits unit is eligible for, divided by 100			0.0193 ***	1.019	0.0203 ***	1.021	0.0208 ***	1.021
Unit annual earnings, divided by 1,000			-0.0080 **	0.992	-0.0087 **	0.991	-0.0087 **	0.991
Child Present - 2 Parents			-0.1585 **	0.853	-0.1302 *	0.878	-0.1686 **	0.845
Child Present - Single Parent			1.0700 ***	2.915	1.1287 ***	3.092	1.1060 ***	3.022
Child Present - No Parents			1.0172 ***	2.766	1.1021 ***	3.011	1.0799 ***	2.945
Elderly person in unit			-1.5915 ***	0.204	-1.6240 ***	0.197	-1.6152 ***	0.199
Disabled person in unit			0.1105 **	1.117	0.0853 *	1.089	0.0748 *	1.078
CA					-1.3276 ***	0.265	-1.1174 ***	0.327
TX					-0.2443 ***	0.783	-0.3292 ***	0.720
CA LPR/other Noncit Unit with Mixed Eligibility					-0.0063	0.994	-0.1745	0.840
CA LPR/Cit Unit with Mixed Eligibility					-0.1084	0.897	-0.2044	0.815
CA Refugee Unit with Mixed Eligibility					-13.6797	<0.001	-13.7161	<0.001
CA Undoc/Cit Unit with Mixed Eligibility					2.3597 ***	10.588	2.3051 ***	10.025
CA All citizen unit with Mixed Eligibility					-2.1150 ***	0.121	-2.1247 ***	0.119
CA LPR/other Noncit Unit with all membs eligible					-0.7647 **	0.465	-0.8735 **	0.417
CA LPR/Cit Unit with all membs eligible					-0.1437	0.866	-0.2480	0.780
CA Refugee Unit with all membs eligible					-1.2303 *	0.292	-1.2916 *	0.275
TX LPR/other Noncit Unit with Mixed Eligibility					0.2071	1.230	0.0320	1.033
TX LPR/Cit Unit with Mixed Eligibility					0.8559 **	2.354	0.7734 *	2.167
TX Refugee Unit with Mixed Eligibility					-0.2656	0.767	-0.2868	0.751
TX Undoc/Cit Unit with Mixed Eligibility					0.2074	1.230	0.1453	1.156
TX All citizen unit with Mixed Eligibility					-0.2957	0.744	-0.2920	0.747
TX LPR/other Noncit Unit with all membs eligible					0.1041	1.110	-0.0161	0.984
TX LPR/Cit Unit with all membs eligible					0.0749	1.078	-0.0287	0.972
TX Refugee Unit with all membs eligible					0.6665	1.947	0.6237	1.866
Percentage of state population that is foreign-born							-0.0134 ***	0.987
percent change in foreign born population, 1990-2000							-0.0011 **	0.999
State median income, divided by 1,000							-0.0176 ***	0.983
state unemployment rate during datayear (percent)							0.0321	1.033
N	27,742		27,742		27,742		27,742	
c	0.578		0.817		0.827		0.828	
-2 Log L	37,521		28,267		27,292		27,186	

\*  $p \leq 0.05$ ; \*\*  $p \leq 0.01$ ; \*\*\*  $p \leq 0.001$

**Table 22: Logistic Regression Results for Low-Income, Food Stamp–Eligible Units  
March 2000, 2001, 2004, 2005 CPS (Calendar Years 1999–2000, 2003–04)**

	Model 1		Model 2	
Characteristic	Parameter Estimate	Odds Ratio	Parameter Estimate	Odds Ratio
LPR/other Noncit Unit with Mixed Eligibility	-0.1367	0.872	-0.4957 *	0.609
LPR/Cit Unit with Mixed Eligibility	-0.5641 ***	0.569	-1.0079 ***	0.365
Refugee Unit with Mixed Eligibility	0.3145	1.370	-1.0478 **	0.351
Undoc/Cit Unit with Mixed Eligibility	-1.218 ***	0.296	-1.4120 ***	0.244
All citizen unit with Mixed Eligibility	0.0707	1.073	-1.3265 ***	0.265
LPR/other Noncit Unit with all membs Eligible	0.3602 *	1.434	0.7899 ***	2.203
LPR/Cit Unit with all membs Eligible	-0.5915 ***	0.554	-0.6154 ***	0.540
Refugee Unit with all membs Eligible	0.3808 *	1.463	0.3960 *	1.486
in time period 2 (2001-2002)	0.257 ***	1.293	0.3913 ***	1.479
LPR/other Noncit Unit with Mixed Eligibility in t2	0.445	1.561	1.0965 **	2.994
LPR/Cit Unit with Mixed Eligibility in t2	-0.1309	0.877	-0.2458	0.782
Refugee Unit with Mixed Eligibility in t2	-0.538	0.584	-0.3129	0.731
Undoc/Cit Unit with Mixed Eligibility in t2	0.2907 **	1.337	0.1806	1.198
All citizen unit with Mixed Eligibility in t2	-0.4021 **	0.669	0.1537	1.166
LPR/other Noncit Unit with all membs elg in t2	-0.3186	0.727	-0.4587 *	0.632
LPR/Cit Unit with all membs elg in t2	0.2703 *	1.310	-0.1453	0.865
Refugee Unit with all membs elg in t2	0.1964	1.217	-0.0504	0.951
Unit received TANF during the year			2.0313 ***	7.624
Unit received SSI during the year			1.9633 ***	7.123
FS benefits unit is eligible for, divided by 100			0.0252 ***	1.026
Unit annual earnings, divided by 1,000			-0.0115 ***	0.989
Child Present - 2 Parents			-0.5388 ***	0.583
Child Present - Single Parent			0.7172 ***	2.049
Child Present - No Parents			0.6325 ***	1.882
Elderly person in unit			-1.4229 ***	0.241
Disabled person in unit			0.1191 ***	1.127
N	45,609		45,609	
c	0.612		0.821	
-2 Log L	62,058		46,799	
* $p \leq 0.05$ ; ** $p \leq 0.01$ ; *** $p \leq 0.001$				





## **Appendix: Detailed Methodology**

### ***Data Sources***

Our approach involves the use of Current Population Survey (CPS) data for 1999–2004, with several important innovations that help us better isolate the impact of Food Stamp Program (FSP) participation trends and the impact of Farm Bill eligibility restorations on households with legal immigrants. Specifically, we (a) distinguish among immigrants by legal status, (b) determine eligibility for food stamps, and (c) correct for under-reporting and misreporting of FSP participation by survey respondents. Our analysis uses the Transfer Income Model (TRIM3), which has been developed at the Urban Institute under primary funding from the Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation (HHS/ASPE). TRIM3 is used to determine benefits eligibility and receipt in ways that correct for the under- and misreporting of benefit use by respondents to the CPS. Our analyses use TRIM3’s assignment of legal status to distinguish LPRs from other immigrants (e.g., naturalized citizens, undocumented immigrants) in the CPS. These datasets permit us to differentiate among various types of mixed status and other legal immigrant families, and to analyze data for states and groups of states.

*Current Population Survey (CPS).* The analysis uses six Annual Social and Economic Supplements to the CPS—March 2000 through March 2005. These CPS supplements cover income and food stamp participation data for calendar years 1999 through 2004. The CPS is a nationally representative household survey that includes information about nativity, citizenship, income, household composition, and self-reported benefits receipt—information we use to

determine food stamp eligibility and receipt based on the TRIM3 model. We group the data into three samples:

- 1999–2000 (baseline that predates the 2001–02 economic slowdown);
- 2001–02 (a period of caseload growth during the economic slowdown, eligibility expansions, and application streamlining); and
- 2003–04 (during and immediately following the Farm Bill’s legal immigrant restorations).

In some of our analyses, particularly our regression models, we combine two years of data for each period to ensure our samples are large enough to examine different types of immigrant units and to disaggregate results for some key states and groups of states. In others—particularly the alternative simulations of immigrant eligibility and participation with and without the Farm Bill restorations—we use single years of data. Eligibility rules are coded in TRIM3 extracts for entire years. As a result, the April 2003 restorations—to noncitizen adults with at least five years of legal U.S. residency—are applied to the eligibility rules in the 2003 data (because April occurred less than halfway through the year). The October 2003 restorations—to legal immigrant children regardless of length of residency—are applied to the 2004 TRIM3 data (as the restoration only affected eligibility for the last three months of the year). Consequently, some of our results—particularly the number of LPR children eligible for and receiving food stamps—vary considerably between 2003 and 2004.

*The Transfer Income Model.* The TRIM3 model provides a basis for identifying households that are eligible for and receive food stamps. TRIM3 is the latest version of a microsimulation model developed and maintained at the Urban Institute for the past 30 years, with primary funding from HHS/ASPE. TRIM3 is a comprehensive model of major tax, health,

and transfer programs affecting the U.S. population, including the FSP. The basic data for TRIM3 is the March supplement to the CPS. Individual responses to the CPS tend to understate participation in major social welfare programs, including the FSP. Notwithstanding the underreporting of participation, many individuals and households in the CPS that report receiving Food Stamps do not appear to be eligible to participate. TRIM3 corrects for both these errors. TRIM3 captures most real-world eligibility details by following the same steps that a caseworker would take, including applying assets tests, computing gross income, subtracting allowable deductions to arrive at net income, and applying income tests. A key feature of TRIM3 is the ability to simulate program participation under alternative eligibility rules and compare these results with the existing baseline set of current rules (Giannarelli et al. 2001).

*Food stamp eligibility and participation.* TRIM3 corrects for underreporting and misreporting of food stamp receipt in the CPS by matching the TRIM3 caseload estimate to the actual caseload—as reported by state-level administrative data—in overall size and key characteristics. All units classified as eligible that report receiving food stamps in the CPS are included in the TRIM3 caseload, while those units that report receiving benefits but are determined ineligible by TRIM3 are excluded from the caseload. Then, a portion of units that have been determined eligible but did not report food stamp receipt are added to the TRIM3 food stamp caseload to match as closely as possible the administrative targets for the size and characteristics of the caseload. This last step is crucial to correct for the significant underreporting of transfer program benefits that has been documented in the CPS (Wheaton and Giannarelli 2000).

*Eligibility and participation for legal immigrants.* TRIM3 explicitly considers noncitizen eligibility rules for FSP and other programs by differentiating among U.S. citizens, refugees,

LPRs, and nonqualified immigrants (including undocumented immigrants and legal temporary residents). Undocumented and temporary immigrants were never eligible for food stamps, and the restrictions on noncitizen eligibility have no effect on eligibility among citizens, whether naturalized or born in the United States. For LPRs and other qualified immigrants, TRIM3 determines eligibility based on the following factors, as specified in the Food Stamp Act:

- status as a refugee or asylee;
- age;
- length of U.S. residency;
- 40 quarters of work, including quarters worked by spouses and parents;
- active duty military and veterans, as well as their dependents and spouses;
- disability status, receipt of Supplemental Security Income (SSI), general assistance, and other disability benefits; and
- entry into the United States before and after the passage of the Personal Responsibility and Work Opportunity Reconciliation Act in August 1996.

TRIM3 also prorates the income of ineligible unit members (usually noncitizen adults in our analysis) by a ratio of the number of eligible unit members to all unit members, as is the practice in most states when determining noncitizen eligibility. Eligibility for state-funded food assistance programs and sponsor deeming are not modeled. The reasons for not modeling sponsor deeming are discussed in detail later in this appendix and in the conclusion to the report.

### ***Definitions and Classification of Data***

*Legal Status of Individuals.* One essential component of TRIM3 is the assignment of legal status to immigrants in the CPS data. Legal status must be known so TRIM3 can accurately determine program eligibility for food stamps and other benefits and so restrictions on noncitizen eligibility can be modeled and alternatives simulated. The Urban Institute has developed a series of methods and procedures to use CPS data on nativity and citizenship to assign more detailed

migrant statuses to immigrants (Passel and Clark 1998; Passel et al. 2004), with funding from HHS/ASPE and other sources.

The CPS asks whether respondents and other unit members are

1. U.S.-born citizens;
2. U.S. citizens born in the territories;
3. U.S. citizens born abroad to U.S. citizen parents;
4. foreign-born naturalized U.S. citizens; or
5. noncitizens.

For TRIM3 and our analyses, the first four categories are considered U.S. citizens, while those in the “noncitizen” category are further disaggregated by legal status into

- (a) refugees and asylees;
- (b) legal temporary residents;
- (c) legal permanent residents (LPRs); and
- (d) undocumented immigrants (illegal aliens).<sup>12</sup>

Refugees and legal temporary residents are small groups that are not the focus of our analysis. Undocumented immigrants are a larger group but also not the focus of the study. Our main focus is on LPRs, who were the beneficiaries of the 2002 and 2003 Farm Bill eligibility restorations. In the remainder of this section, we briefly outline the procedures used to assign legal status to foreign-born individuals in the CPS and TRIM3.

*Naturalized citizens.* The CPS data on naturalized citizens, as collected, are overreported; that is, there are more naturalized citizens in the CPS data than the number of naturalizations granted by the Immigration and Naturalization Service (INS) and its successor agencies within

---

<sup>12</sup> We use the term “undocumented immigrants” to encompass all those foreign-born noncitizens not in the other categories. This group is variously known as “illegal aliens,” “unauthorized migrants,” “undocumented workers,”

the Department of Homeland Security (DHS). (See Passel and Clark 1998.) The degree of overreporting is especially serious for those not in the United States long enough to qualify for naturalization.<sup>13</sup> For longer-term residents, overreporting is serious only among immigrants from Mexico and Central America. For the former group, we edit the reported naturalized citizens to be noncitizens. For the latter, some immigrants who report being naturalized are likely undocumented, and corrections for misreporting of citizenship for this group are made later when undocumented status is assigned. (See below.)

*Refugees and asylees.* Refugees are granted legal status in the United States owing to a “well-founded fear” of persecution in their home countries and are granted this status before entry to the United States. Asylees, who meet the same criteria, claim asylum after arriving in the United States—usually either illegally or with a temporary visa—and must prove their case in court. The food stamp eligibility rules for refugees and asylees differ from those for other legal immigrants. Specifically, refugees and asylees are eligible for the FSP during their first seven years in the United States, regardless of age, disability, veteran status, or work history. Thus, it is important to distinguish refugees and asylees from legal permanent residents in the CPS data.

We identify refugees and asylees in the CPS using country of birth and year of entry data, because refugee flows tend to be concentrated from just a few countries. Further, the major refugee-sending countries tend to send relatively few other immigrants while sending refugees. Thus, immigrants arriving during periods of entry when a majority of legal admissions<sup>14</sup> from a country are refugees or asylees (versus other LPR new admissions) are designated as refugees.

---

and so on. Some individuals in this group are known to the government, and some may even have temporary work authorization. One trait they all share is ineligibility for the FSP.

<sup>13</sup> Five years in LPR status is required before most immigrants can become citizens. Spouses of U.S. citizens must wait only three years; children of U.S. citizens can naturalize with no waiting period.

<sup>14</sup> We use “new arrivals” compared with refugee arrivals and ignore LPRs who were already in the country and had “adjusted” their status.

The exact cutoff point for the qualifying percentage majority in each country is chosen so the total number of refugees identified is equal to a demographic estimate of the refugee population.

*Temporary legal migrants.* A third group we identify among foreign-born U.S. residents are those admitted legally on a temporary basis, but for extended periods (usually more than one year); the major groups are foreign students and temporary workers. Temporary residents do not have the same rights as legal permanent residents: they are not eligible for the FSP, and they must become LPRs before they can apply for citizenship. We identify likely temporary legal residents among the recently arrived foreign born by matching the characteristics of CPS respondents with the visa requirements to identify a total of about 12 different visa categories including foreign students, high-tech guest workers, intracompany transfers, and au pairs. We use information on occupation, industry, educational attainment, and school enrollment as well as information about family relationships and relatives in the United States. Overall, legal temporary migrants make up only about 4–5 percent of the foreign born, and they are excluded from our analyses.

*Legal permanent residents (LPRs).* Once we have identified refugees, asylees, and legal temporary migrants, we then distinguish LPRs from undocumented immigrants among the remaining noncitizens. Most LPRs are admitted to live permanently in the United State because they are related to U.S. citizens or LPRs already in the country. Most of the rest are admitted for employment purposes because they possess skills needed by employers in the United States. In our assignment process, LPRs are the noncitizens left unassigned after undocumented immigrants are identified using the methods described below.

*Undocumented immigrants.* Undocumented immigrants lack valid temporary visas and other immigration documents, and analysts often classify them into two broad groups. First, just

over half of undocumented immigrants cross the border without documents and are officially designated as “entries without inspection.” The rest of the undocumented population enter the United States with valid documents for a temporary status but stay beyond their period of admission or otherwise violate their terms of admission; they are usually designated “visa overstayers.” To identify individuals in the CPS who are likely to be undocumented immigrants, we first construct an estimate of the number of legal immigrants and legal temporary migrants in the CPS by calculating the total number of these legal immigrants based on DHS admissions data. We then develop a “residual” estimate of the undocumented population by subtracting the number of LPRs and other legal immigrants from the total number of noncitizens in the CPS data. We calculate residual estimates of the undocumented population for groups by country of birth, age, sex, period of immigration, and for six states and the balance of the country.

At the microsimulation level, we distinguish LPRs from undocumented immigrants in the CPS data based on an array of characteristics, including those used for the residual estimates just described as well as information on educational attainment, occupation, industry, and family relationship. Regression analysis of data from a sample of previously undocumented immigrants in the 1992 Legalized Population Survey and our own estimates are used to develop probabilities of being either LPR or undocumented. Where necessary, we split cases in the CPS based on these probabilities; for example, if an individual’s probability of being undocumented is 0.7, we replicate the case into three LPR cases and seven undocumented cases, each case having one-tenth of the original weight. We perform a final set of adjustments and edits to ensure that legal statuses within families are consistent and that the total numbers of LPRs and undocumented immigrants equal the control totals set by our demographic estimates of the these populations in the CPS.



*Eligibility units.* Our basic unit of analysis is the TRIM3 eligibility unit, which is used to calculate food stamp eligibility, participation, and annual benefit levels. In most cases, the TRIM3 eligibility unit is the same as the CPS household. But TRIM3 subdivides some CPS households into smaller units, particularly when there are groups of household members eligible for and/or receiving TANF. (TANF eligibility units are closer to families instead of households.) Throughout this report, references to “units” and “family units” refer to food stamp eligibility units defined by TRIM3.

*Low-income units.* We limit our sample for analysis to “low-income” units, which we define as eligibility units with incomes below 200 percent of the federal poverty level (FPL). We choose 200 percent of FPL to capture more income variation and include some units that are eligible for food stamps despite the fact that their income exceeds 130 percent of FPL, the income cutoff for most units in the FSP. We are missing a small fraction of food stamp-eligible and receiving units with incomes over 200 percent of FPL; in 1999–2000, 91 percent of eligible units had incomes below 200 percent of FPL.

*Presence of children.* We disaggregate units into those with and without children. Part of our emphasis in later analyses will be on units with children because of the October 2003 restoration of food stamps to all legal immigrant children. Further, we are interested in tracking the eligibility and participation of units with both citizen and noncitizen members, as well as those with LPR and other noncitizen members. Frequently, immigrant units are composed of noncitizen adults and citizen children—children who are young enough that they were born in the United States after their parents immigrated. In fact, 80 percent of children of immigrants are U.S. citizens (Capps 2001).

*Legal status of unit members and classification of units.* We use TRIM3's assignments of legal status to calculate the number of citizen, LPR, undocumented, and refugee members in each unit. Units in which all members are noncitizens are particularly important—especially units with undocumented immigrants—because these units may be entirely ineligible for food stamps owing to noncitizen restrictions. Identification of “mixed eligibility” units—where some members are eligible U.S. citizens and others are ineligible noncitizens—is also critical because such units generally qualify for lower benefit allocations than units where all members are eligible. In addition to reducing benefits, the reduced benefit allocation may depress their participation. We use citizenship and legal status to classify eligibility units as follows:

1. ***All Citizen:*** The largest group of units includes only citizens. Units composed entirely of citizens have been insulated from changes to noncitizen eligibility rules in the FSP, although they may be affected by a range of other policy changes such as rules for able-bodied adults without dependents, resource limits, certification periods, transitional benefits, and TANF and other sanctions. We use citizen-only units as a control group to contrast patterns of food stamp eligibility and use with those for units with noncitizen members.
2. ***LPR/Citizen:*** These units contain at least one legal permanent resident and one U.S. citizen; they may or may not contain other immigrants. In most but not all cases, the LPRs are adults and at least one child is a citizen. These mixed units represent the second-largest group of low-income units with children, but a much smaller share of units without children. This group is perhaps the most affected by the legal immigrant eligibility rules, but it often is affected in terms of the *number of unit members who are eligible* instead of the entire unit's eligibility. Many of these are “mixed eligibility” units, because the LPR members are ineligible but the citizen members are eligible.
3. ***LPR/Other Noncitizen:*** These units have at least one legal permanent resident but no citizen members; most other members of these units are either other LPRs or undocumented immigrants, although some may be refugees or temporary residents. This group is a small share of units with children, but a larger share of units without children. Some of these units are likely to be ineligible owing to legal immigrant restrictions, while others are mixed eligible, and still others entirely eligible. This group has also been affected by the 2002 and 2003 Farm Bill restorations but to a lesser degree than the previous one.
4. ***Undocumented/Citizen:*** These units contain at least one undocumented immigrant and one U.S. citizen; they may or may not contain other immigrants. Again, it is usually the adults who are undocumented and at least one child who is a citizen. This group is also relatively large for units with children, and relatively small for those without children.

5. ***All Undocumented:*** These units are composed solely of undocumented immigrants, so no members are eligible for food stamps. They are excluded from our analysis.
6. ***Refugee:*** These units are composed either solely of refugees or of refugees and citizens. Because refugees are eligible for food stamps for their first seven years in the United States (regardless of their age, disability, veteran status, or work history), it is important to distinguish refugee units from those with LPR members, even though there are relatively few refugee units. Further, we feel it is important to distinguish them from citizen units because of different patterns of food stamp and welfare use between citizens and refugees (Fix and Passel 2002).

### ***Eligibility Simulations***

*Baseline Simulation.* TRIM3 uses FSP eligibility rules—including those for immigrants—in place at the time the data were collected to calculate eligibility, participation, and the amount of benefits received. This “baseline” simulation is aligned to reflect administrative totals for food stamp participation on a *monthly* basis. In other words, eligibility and participation are calculated for each month and aligned to administrative totals for that month.

In our analyses, we use *annual* eligibility and participation data rather than the monthly data from TRIM3; that is, we identify units that were eligible for and/or received food stamps *during any month in the year*. Our annual totals are therefore considerably higher than administrative totals for any given month, or for any average month during the year, because so many units use food stamps for only part of the year. We have opted to model annual eligibility and participation in order to capture the broadest sample possible and to minimize any errors in monthly estimates.

Our baseline simulation for 2003 includes eligibility adjustments in TRIM3 for the first two Farm Bill restorations: disabled legal immigrants (October 2002) and legal immigrants with at least five years of U.S. residency (April 2003). The 2003 baseline *does not include* eligibility

adjustments for the third restoration, to all LPR children regardless of length of residency, which took place in October 2003. The third restoration is included in our 2004 baseline, along with the other two restorations. We show baseline simulations for 2003 and 2004 separately in order to gauge the impact of the third restoration. We see the impact most clearly on the number of LPR children who became eligible and participated in the FSP.<sup>15</sup>

Additionally, TRIM3 allows us to model eligibility for each *individual* in the unit. Therefore, we can identify units where all members are eligible, as well as those in which only some are eligible. These mixed-eligibility units are a large and important share of legal immigrants' units, especially those with citizen members.

*Alternative simulations.* We also conducted two alternative simulations using TRIM3: one that estimates eligibility and participation rates of low-income units had the Farm Bill legal immigrant restorations not occurred, and a second that estimates eligibility and participation without any of the legal immigrant eligibility restrictions in PRWORA in place—in other words, as if a full eligibility restoration had occurred. We tabulated and analyzed differences between the actual receipt and eligibility figures and the simulated receipt and eligibility figures; we also tabulated differences in mixed-eligibility rates and median benefits for eligible units among the different scenarios. We report findings from our alternative simulations for 2003 and 2004 separately when appropriate, since the first two restorations appear in our CPS TRIM3 data in

---

<sup>15</sup> The TRIM3 baseline simulation does not model categorical eligibility through noncash TANF receipt because data on noncash benefits are not collected by the CPS. TRIM3 does not model differences across states in vehicle rules because there are no CPS data on vehicle values. Additionally, TRIM3 does not model the availability of state-funded food stamp replacement programs for LPRs who would be eligible if not for the citizenship restrictions, or in rules for treatment of the income of ineligible unit members. TRIM3 has the capacity to set different rules by state for alternative simulations, but state replacement programs are not modeled and the baseline simulation assumes that income and deductions of ineligible noncitizens are prorated by the ratio of eligible to total unit members. The research and programming needed to simulate state replacement programs or state-specific rules about the income and deductions of ineligible aliens are beyond the scope of this study.

calendar year 2003, while the third restoration—to all LPR children—does not appear until the 2004 data.

*Treatment of LPRs subject to sponsor deeming.* Our baseline and alternative simulations for 2003 and 2004 assume that there was *no sponsor deeming* outside the food stamp unit for LPRs in these years. The new, more rigorous deeming requirements only apply to immigrants who were sponsored by individuals and arrived after December 1997, when sponsors had to sign the new legally binding affidavit of support. A significant minority of LPRs are sponsored by employers, churches and other institutions—and so are not subject to deeming rules at all. In 2003 and 2004, few immigrants with five years residence had arrived after December 1997. In April 2003, only LPRs arriving between January and April 1998 would have been eligible under the restoration and subject to sponsor deeming. By December 2004, newly eligible LPRs subject to deeming would have included just those arriving between January 1998 and December 1999.

Even after the legally binding sponsorship rules took effect, only a small minority of LPRs eligible for food stamps had sponsors living outside their units. FSP rules have always required the income of the sponsor to be counted whenever the sponsor is a member of the food stamp unit. Recent data from the New Immigrant Survey, analyzed by Mathematica Policy Research (MPR) for the U.S. Food and Nutrition Service, suggest that only between a quarter and a third of newly admitted LPRs who are not refugees or asylees have sponsors outside their units.<sup>16</sup> More specifically, only 26.4 percent of nonrefugee, nonasylee LPRs had sponsors outside their units; when only low-income units (using a threshold of 200 percent of the federal poverty level) are considered, this rate rises slightly to 30.6 percent. Based on these data, MPR

---

<sup>16</sup> Alison Barrett, “The New Immigrant Survey and Estimates of the Percentage of Lawfully Admitted Permanent Residents Eligible for the Food Stamp Program—Final Memo,” unpublished memorandum to Jenny Genser, U.S. Food and Nutrition Service, July 26, 2006.

researchers recommended randomly assigning 26.4 percent of all LPR units in the March CPS as subject to deeming when conducting food stamp eligibility models, although this would only apply to units with LPRs who arrived after December 1997. Performing this assignment was beyond the scope of this study.

Food stamp eligibility rules also allow LPRs subject to deeming to claim an “indigent exemption,” based on economic hardship, as long as they agree to allow their names to be reported to the U.S. Attorney General. Further, as of 2003–04 when the Farm Bill restorations were first implemented, few states had begun implementing deeming procedures because deeming was largely unnecessary before the restoration (Capps et al. 2004). As a result of all these factors, we assume that *no sponsor deeming* took place immediately following the restorations. This assumption may mean that we slightly overestimate the restorations’ impacts by treating some people as newly eligible whom the states would have disqualified because of deeming. It is also likely that the share of LPR units subject to sponsor deeming has risen since 2004, potentially muting the impact of the restorations over time.

### ***Decomposition of Trends in Participation Rates***

We apply demographic decomposition techniques to changes between 1999–2000 and 2003–04 in the participation rate among low-income units with children that are eligible for the FSP. Specifically, we allocate the change in FSP participation rates between 1999–2000 and 2003–04 into the proportions due to each of the following:

- change in the share of all citizen, LPR/citizen, undocumented/citizen, LPR/other noncitizen and refugee units;
- change in the share of mixed-eligible units; and
- change in the underlying participation rate for these units.

We use the decomposition method developed by Das Gupta (1993). An important advantage of Das Gupta's approach, compared with other decomposition methods, is that it decomposes changes into additive main effects (here, changes in unit types, mixed eligibility, and participation rates) without the need for interaction terms, which can be difficult to interpret. Fix and Passel (2002) applied Das Gupta's decomposition method to changes from 1994 to 1999 in participation in FSP and other means-tested benefits among units of different citizenship and immigration status.

### ***Regression Analysis of Food Stamp Participation***

Using logistic regression techniques, we model food stamp participation among low-income units that are eligible for the FSP. In this report we display findings from a regression model of participation in the third period of the study (2003–04). We also report estimates from a regression model of participation in two periods (1999–2000 and 2003–04). The two-period model includes a term for the period and terms for the interaction of the period with the other independent variables in the model.

Our logistic regression models treat the probability that an eligible food stamp unit receives food stamps as a function of citizenship and legal status of the unit, the amount of benefits for which the unit is eligible, other characteristics of the unit, and the characteristics of the state where the unit resides. The full model for analyzing changes between 1999–2000 and 2003–04 is described below:

$$P_{ijt} = \alpha_0 t_{ij} + \alpha_1 I_{ijt} + \alpha_2 S_j + \beta_0 E_{ijt} + \beta_1 X_{jt} + \gamma_0 (I_{ijt} * S_j) + \gamma_1 (I_{ijt} * t_{ij}) + \gamma_2 (S_j * t_{ij}) + \theta (I_{ijt} * S_j * t_{ij}) + \varepsilon_{ijt}$$

where

$P_{ijt}$  = probability that unit  $i$  in state  $j$  receives food stamps;

$I_{ijt}$  = five citizenship and legal status categories for units: all citizens, mixed LPR/citizen, mixed undocumented/citizen, all noncitizens (at least one LPR and other members LPRs or undocumented), and refugees (at least one refugee). All-citizen units were coded as the reference group and each of the other four categories as a separate dummy variable.

$S_j$  = two major immigrant states (California and Texas), coded as dummies, with all other states as the reference group;

$E_{ijt}$  = unit characteristics at time  $t$ : continuous variables for unit earnings and the total food stamp benefit for which TRIM3 estimates the unit is eligible; dummy variables for the presence of children, presence of adults over age 64, presence of disabled unit members, TANF receipt, and SSI receipt.

$X_{jt}$  = state-level characteristics at time  $t$ : unemployment rate, median unit income, 2000 foreign-born share of total population, and 1999–2000 growth rate in foreign-born population;

$t_{ij}$  = a dummy variable denoting the two periods (i.e., set to 0 for 1999–2000 and 1 for 2003–04). The model for our single-point-in-time regression (2003–04) excludes this variable and all the interactions that involve it.

The coefficients in the regression equation represent the effects on the probability of an eligible unit's food stamp participation controlling for all other factors. The alpha and beta coefficients represent base coefficients or the “first” level of differences:

$\alpha_0$  = the overall change in the participation rate between time 1 and time 2 (this term is not calculated for our single-point-in-time regressions for 2003–04);

$\alpha_1, \alpha_2$  = effects on participation of, respectively, citizenship and legal status categorization of the unit, and state policies; and

$\beta_0, \beta_1$  = effects on participation of, respectively: demographics, earnings, benefits allocations, and other program receipt for units, and state economic conditions and foreign-born population shares.

The gamma terms represent the “second” level of differences or changes across time in these factors, controlling for other factors:

$\gamma_0, \gamma_1, \gamma_2$  = effects on participation of changes in, respectively, the distribution of eligible units across states, the distribution of units over time (not included in 2003–04 single-point-in-time regressions), and the distribution of units across states over time (also not included in single-point-in-time regressions).



The theta term ( $\theta$ ) isolates the impact of various state characteristics on the change in participation of eligible immigrant units over time, controlling for all other factors, whereas the other coefficients measure the impacts at a point in time. This last term, the “triple difference” coefficient (Borjas 2001), can be thought of as a series of interactions among characteristics, the citizenship and legal status of the unit, two major immigration states (again, California and Texas), and the years of the survey (in this report, 1999–2000 versus 2003–04). This term is not calculated for our single-point-in-time regressions for 2003–04.

We attempted several different approaches to analyzing state-level differences, but these approaches were limited by the small sample sizes for most states in the CPS. We considered grouping states by the presence of a state-funded replacement program for food stamps for LPRs whose eligibility was restricted by PRWORA.<sup>17</sup> We also considered analyzing the four largest states separately (California, Texas, New York, and Florida). There is considerable overlap between the replacement-program states and California; in fact, the vast majority of state program cases reside in California. Because results for the replacement-program states so closely mirrored those for California, we excluded the replacement-program state variables in the final models. Instead, we chose only to use the four major states; of these, only California and Texas showed significant results. As a result, in our final models we only included dummy variables for California and Texas, along with interactions with the citizenship and legal status categorizations. It is unlikely that other individual states or groups of states would show significant results because of small sample sizes for noncitizen units.

---

<sup>17</sup> The TRIM3 baseline simulation does not model eligibility or benefits from the state replacement programs. It is possible that some people receiving benefits from these programs report participation in the regular federal FSP on the CPS. TRIM3 would treat such cases as ineligible reporters, and set to 0 both the benefits for which they are simulated to be eligible and the benefits they are simulated to receive. Modeling state replacement programs is outside the scope of this study.