
Policy Close Up #1

Higher Education And Its Eroding Affordability Over The Decade 2010-19

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Summary: New York State is considering proposals to increase the cost of attending public college, while continuing to freeze the major financial assistance program offered by the state. This review examines the ten-year-trend in tuition, financial aid, and other college affordability measures in New York’s higher educational institutions. This review reveals a continuing shift in the cost of attending public college from the state to the college students and their families. In addition, freezing the maximum Tuition Assistance Program (TAP) award limits financial aid to students at independent colleges and universities. **State lawmakers must reject hikes in the costs of attending public colleges and modernize and expand funding to TAP, as well as take other steps to improve college affordability.**

Background: Investing New York’s tax dollars into institutions of higher education strengthens the state’s economy, even amid a climate of budget-tightening. A study on SUNY found that for every \$1 spent on education, the economy reaps over \$8 in benefits.¹ In short, investing in college education positively drives the state’s financial future.

College-educated workers earn more than their high-school educated peers – by an average of \$30,000 per year, as found by the Federal Reserve Bank of New York.² As wages increase, so do tax revenues which support any number of public services. The average bachelor’s degree holder contributes \$278,000 more to local economies than the average high school graduate through direct spending over the course of their lifetime; and an associate degree holder contributes \$81,000 more than a high school graduate.³

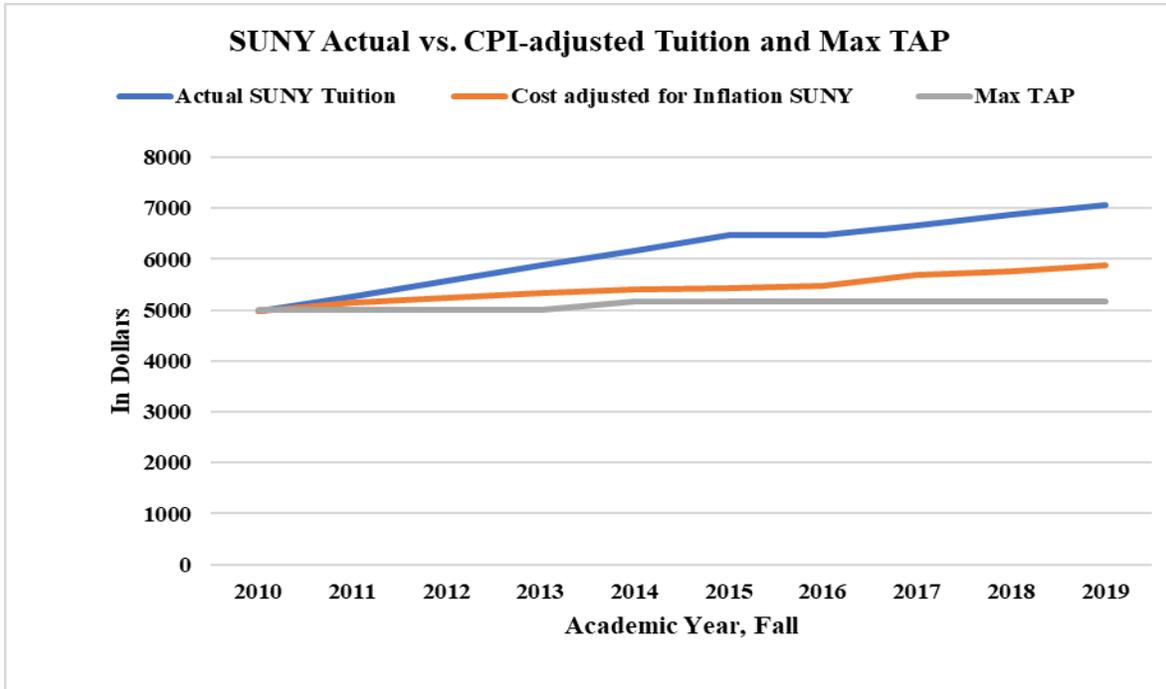
There is an increasing need for a college degree in today’s economy. The availability of blue-collar jobs that do not require a bachelor’s degree has decreased by 30 percent since 1991. Nationally, New York ranks in the top four states with the highest decrease in blue collar jobs.⁴ Higher education access and degree completion must remain a priority in this year’s budget.

BOOST TAP AND ELIMINATE THE “TAP GAP”

New York State’s Tuition Assistance Program (TAP) is a generous program that commits the state to aid the neediest college students – both in public and independent institutions. It is TAP (combined with support from the individual SUNY and CUNY colleges as discussed later) that offers “free tuition” to the vast bulk of college students attending public college and contributes aid to students attending independent colleges and universities.

Prior to 2011, New York would increase the maximum TAP award to match the state’s public college tuition. In this manner, the lowest income students would be protected from the impacts of tuition hikes. In addition, students attending independent colleges and universities would benefit from the rising TAP rates.

In 2011, a new law (SUNY2020) changed that relationship. Instead of tying the maximum TAP award to public college tuition, the state decided that while tuition would be automatically raised, TAP would be handled separately (essentially frozen for the past decade) and the colleges themselves would have to supplement financial assistance to the lowest income students. As seen in the following chart, the gap between the maximum TAP award and public college tuition is growing with each annual tuition hike. That gap must be closed with state revenues, instead of campus resources.⁵



As tuition has been raised, public colleges have had to dig deeper into their own resources – which have also been more or less frozen during this time – to provide necessary financial assistance. This deepening hole – the “TAP Gap” – has shortchanged CUNY and SUNY for years, starving campus budgets and putting student support services and educational quality at risk. Last year, CUNY reported a \$74 million TAP Gap.⁶

As seen in the table below, that gap has become significant and if the governor’s proposal to further increase public college tuition is approved in this year’s budget, the financial picture for individual campuses could be even more precarious.

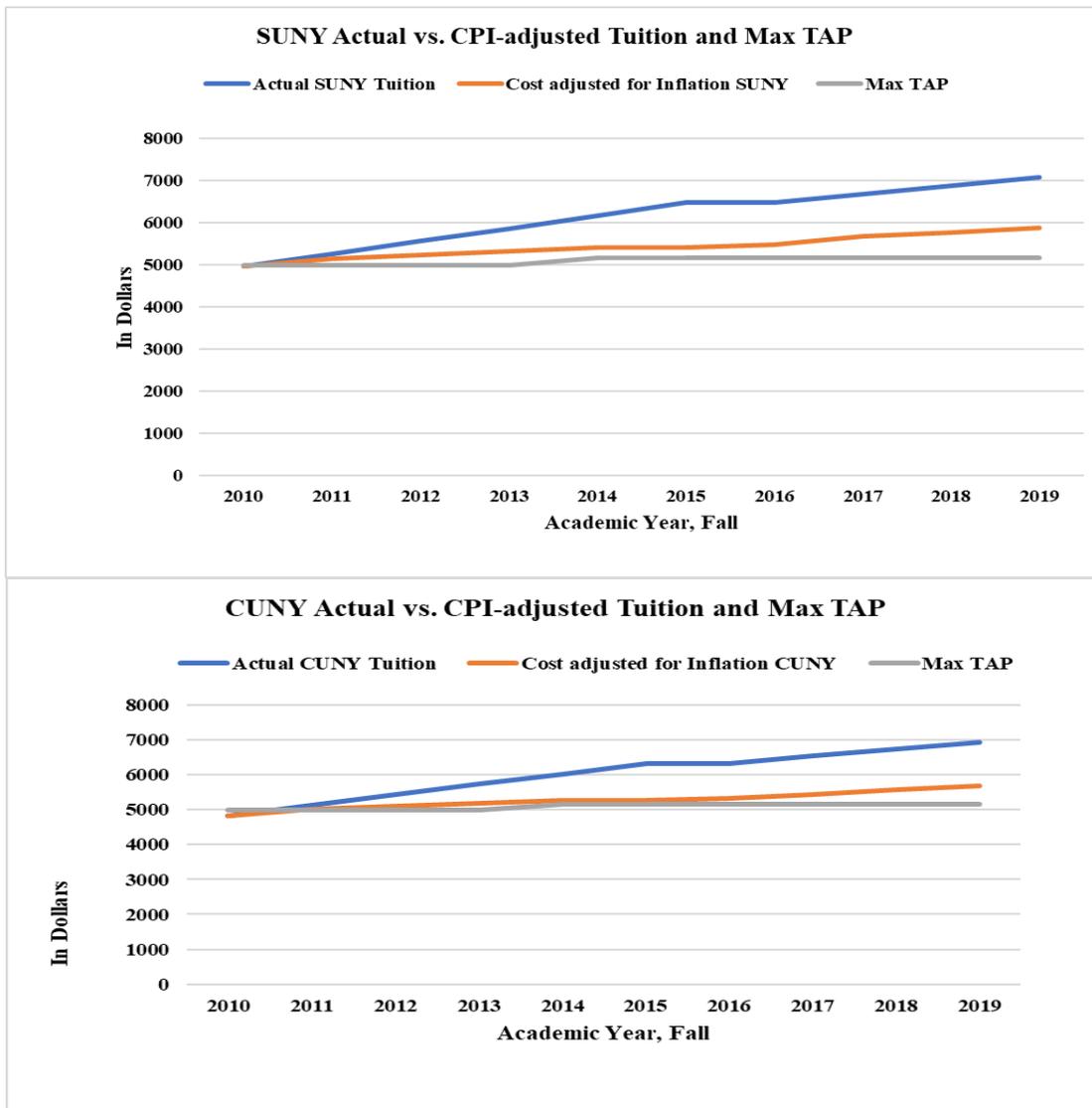
| Fall | Tuition CUNY | Tuition SUNY | Maximum TAP | TAP difference per eligible student (TAP Gap) |
|------|--------------|--------------|-------------|---|
| 2010 | \$4830 | \$4970 | \$5000 | |
| 2011 | \$5130 | \$5270 | \$5000 | \$270 |
| 2012 | \$5430 | \$5570 | \$5000 | \$570 |
| 2013 | \$5730 | \$5870 | \$5000 | \$870 |
| 2014 | \$6030 | \$6170 | \$5000 | \$1170 |
| 2015 | \$6330 | \$6470 | \$5165 | \$1470 ⁷ |
| 2016 | \$6330 | \$6470 | \$5165 | \$1470 |
| 2017 | \$6530 | \$6670 | \$5165 | \$1670 |
| 2018 | \$6730 | \$6870 | \$5165 | \$1870 |
| 2019 | \$6930 | \$7070 | \$5165 | \$2070 |

The best solution is to renew the state’s pledge to match the maximum TAP award to public college tuition rates. In the meantime, additional state support to public colleges is needed to ensure that financial aid awarded to the poorest college students comes from the state, not the individual college.

FREEZE PUBLIC COLLEGE TUITION

If there is one area in the budget that can make a substantial difference, it is public college tuition. The Governor has proposed to expand the state’s so-called “rational tuition” policy – which automatically increases tuition at the State University and City University systems – for another five years after the current law’s expiration next academic year. Despite the clear benefits of public higher education for the health and prosperity of the state, the state routinely underfunds CUNY and SUNY and costs get pushed onto students and their families. Beginning in 2011, nearly constant tuition hikes have raised rates by more than 42%.⁸

As seen in the charts below, when factoring inflation, the automatic tuition hikes at both SUNY and CUNY have far exceeded the growth in the economy. Of course, inflation is different within institutions of higher education, but the Governor’s target of keeping state agencies’ growth to no more than 2% (essentially CPI-inflation) – particularly coupled with the “TAP Gap” described earlier – forces public colleges to rely on tuition dollars for operating costs. These significant increases in tuition have resulted in students shouldering more and more of the costs of running NY’s public college institutions.



A recent NYPIRG analysis that reviewed tuition hikes since 2011 found that New York State has charged public college students nearly \$4 billion more as a result of scheduled tuition hikes at SUNY and CUNY. Even when considering additional assistance provided by TAP and the new Excelsior Scholarship program (more on this program later), students have paid *at least* \$2.5 billion in additional tuition. The additional tuition dollars have

added up over an approximate 9-year period resulting from passage of the “SUNY2020” law first enacted in 2011 and actions by local governments impacting community college costs. The tuition increases during this academic year will drive that number even higher.

ESTIMATED ADDITIONAL TUITION GENERATED BY SUNY2020 AND LOCAL GOV'T DECISIONS⁹

| Academic year | 4-Year Public Colleges | 2-Year CUNY Colleges | 2-Year SUNY Colleges |
|---------------|------------------------|----------------------|----------------------|
| 2011-12 | \$76,682,400 | \$17,324,100 | \$26,127,544 |
| 2012-13 | \$153,476,400 | \$34,057,200 | \$41,644,228 |
| 2013-14 | \$230,885,100 | \$52,143,300 | \$55,191,048 |
| 2014-15 | \$312,176,400 | \$71,318,400 | \$68,053,338 |
| 2015-16 | \$391,251,000 | \$89,476,500 | \$84,536,641 |
| 2016-17 | \$393,852,000 | \$92,753,900 | \$98,898,711 |
| 2017-18 | \$456,965,100 | \$93,262,660 | \$110,549,958 |
| 2018-19 | \$515,642,900 | \$91,330,320 | \$130,340,857 |
| TOTAL | \$2,530,931,300 | \$541,666,380 | \$615,342,325 |

During the years reviewed by this analysis, the state’s All Funds budget increased by over 26%¹⁰ – more than enough to have allowed for increased state support for public colleges and universities, and to halt the growing tuition burden placed on public college students and their families.

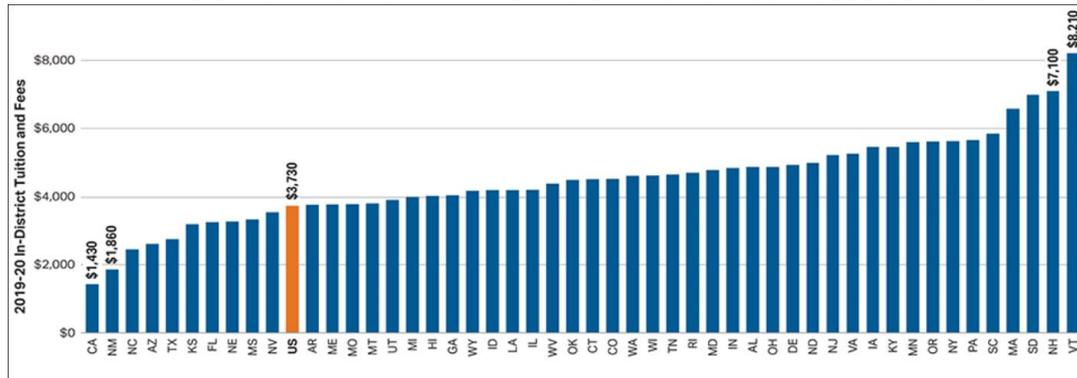
While New York’s substantial financial aid and opportunity programs have shielded some students from these hikes, there are many who fall through the eligibility cracks or who cannot apply for reasons outside of their control. With every tuition hike, New York continues to rely on students and families, many who struggle to keep up with rising costs, rather than addressing years of state underfunding. **The state should reject calls for additional automatic public college tuition hikes and instead freeze tuition at current levels.**

INCREASE SUPPORT FOR COMMUNITY COLLEGES AND FREEZE TUITION AND STAVE OFF ENROLLMENT DECLINES

The Executive Budget includes a decrease in funding for community colleges at SUNY and CUNY, reflecting a decrease in full time enrollment. However, the decline in community colleges is really two different stories. CUNY community colleges have maintained rough equivalence in their enrollments over recent years, but SUNY community colleges have suffered from across-the-board declines in enrollment. At last count, there were 30,000 fewer full-time SUNY community colleges students in AY 2018-19 than there were in AY 2011-12.¹¹ And every SUNY community college lost population, some with apparently catastrophic enrollment declines.¹²

While there are many reasons why, one of them may well be that CUNY – through support from New York City – has kept tuition frozen at its community colleges. SUNY community colleges, on the other hand, have increased tuition significantly to offset population loses and to maintain services. Unfortunately, those tuition increases may trigger even greater enrollment declines. As seen below, NY’s community college tuition costs are among the highest in the nation¹³ – creating a barrier to individuals who need new skills for a rapidly changing marketplace.

NATIONWIDE COMPARISON OF AVERAGE COMMUNITY COLLEGE TUITION



Further, the Executive Budget maintains base aid for community colleges at \$2,947 per FTE, the same as SFY 2019-20. However, the 98 percent funding floor that was included in the SFY 2019-20 Enacted Budget is not continued, resulting in overall community college base aid reductions in both SUNY and CUNY. The resulting overall SUNY community college base aid of \$431.2 million is a reduction of \$22.7 million from last year, and the overall CUNY community college base aid of \$225.2 million amounts to a decrease of \$3.6 million from SFY 2019-20.

The state should support an increase in state aid to offset the costs of attending community colleges and tie such support to tuition freezes at community colleges. In the case of CUNY, the City support of holding the line on student tuition costs should be rewarded, not penalized. In SUNY, it’s hard to imagine how the campuses can survive additional cuts without more tuition hikes – which will exacerbate enrollment declines.

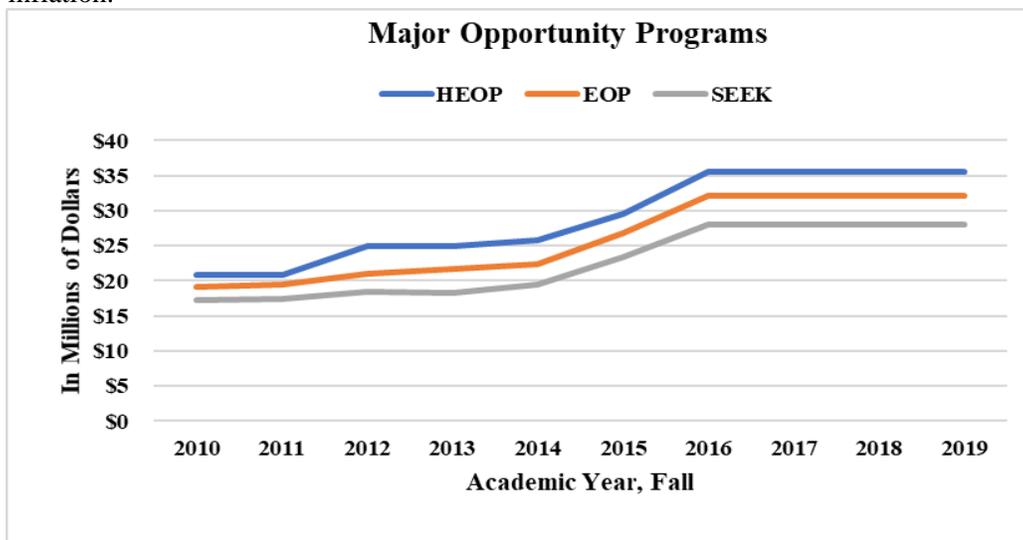
ENHANCE OPPORTUNITY PROGRAMS

Opportunity programs, which are designed for educationally and economically disadvantaged students, have a steady track record of success in increasing graduation rates among the most at-risk students. In general, students in opportunity programs are individuals who have come from low-income communities and often rank low on traditional measures of collegiate admissions standards, such as SAT scores, high school GPA, and class standing.

New York State has several opportunity programs in place to help students overcome the financial and academic obstacles of completing a college education: Search for Education, Elevation and Knowledge (SEEK), Linking Employment, Academics, and Disability Services (CUNY LEADS), Educational Opportunity Program (EOP), Higher Education Opportunity Program (HEOP), College Discovery (CD), and others. These programs take a comprehensive approach to college access and affordability by building in academic counseling, mentoring, and often providing waivers for related costs such as transit, textbooks, and childcare.

SUNY’s EOP provides access, academic support, and supplemental financial assistance to students from disadvantaged backgrounds, many of them the first in their families to attend college. According to SUNY, graduation and retention rates of Educational Opportunity Program (EOP) students compare favorably to that of the general student population at comparable schools. First year retention, where a student re-enrolls for a second year, for SUNY senior college EOP students is 91% percent,¹⁴ whereas first year retention rates for the general student body at SUNY senior colleges is approximately 84%.¹⁵ The six-year graduation rate for EOP students is 73%,¹⁶ whereas the SUNY-wide senior college rate is 68% – similar results exist for opportunity programs found in the independent sector.¹⁷

As seen in the chart below, state support for the major opportunity programs has been stagnant over the past five years, despite inflation.



After four years of flat funding, opportunity programs should see enhanced funding this year.

Further, CUNY’s ASAP assists students in earning associate degrees within three years by providing a range of financial, academic, and personal supports including comprehensive and personalized advisement, career counseling, tutoring, waivers for tuition and mandatory fees, MTA MetroCards, and additional financial assistance to defray the cost of textbooks. ASAP also offers special class scheduling options to ensure that ASAP students get the classes they need, are in classes with other ASAP students, and attend classes in convenient blocks of time to accommodate their work schedules. As students approach graduation, they receive special supports to help them transfer to 4-year colleges or transition into the workforce, depending on their goals. Graduation rates for ASAP students are more than double that of their peers who are not enrolled in these programs.¹⁸ ASAP was cut by \$2.5 million in the Executive Budget. **There must be restoration of funding to CUNY’s ASAP.**

In addition to the above ten-year-trends and recommendations, there are a number of important actions the state can take to stop the erosion of affordability and support student success.

1. Reform the Excelsior Scholarship
2. Expand aid programs at independent colleges and universities
3. Restore and expand child care at CUNY and SUNY
4. Support initiatives such as campus food pantries, online educational resources, and mental health services

REFORM THE EXCELSIOR SCHOLARSHIP PROGRAM

The Excelsior Scholarship acknowledges the state’s tuition burden placed on middle-income students. But the scholarship does not cover everyone and is designed to minimize costs. The Governor proposes to further expand the Excelsior Scholarship to students with higher incomes. NYPIRG supports making college free, so expansion is worthy of support. However, the program needs changes in order to help the largest number of students.

The Excelsior Scholarship mandates 30 credits per year to maintain eligibility (or else the scholarship turns into a loan) and the award is not available for summer and winter sessions. While scholarship recipients can maintain eligibility by taking 12-credits per semester in the fall and spring, they must pay out of pocket for the additional 6 credits in the winter or summer sessions. Meaning, the state’s “free tuition” scholarship is not always tuition-free, even for those who qualify, maintain eligibility, and receive the award. The scholarship is also a “last dollar” program, meaning it will only apply once all other forms of government aid have been applied. New York’s financial aid programs already offer tuition coverage for the poorest public college students. Tuition is not the only financial responsibility associated with obtaining a college degree and Excelsior does not address other expensive costs, such as student housing, textbooks, transit, or food.

Roughly *half* of all Excelsior Scholarship applicants do *not* receive an award.¹⁹ Despite public statements, a very small number of SUNY and CUNY students receive these awards. Undoubtedly, Excelsior helps students who receive and keep the award. But, as seen below, its impact is limited. More needs to be done to broaden its benefits.

EXCELSIOR SCHOLARSHIP PROGRAM RESULTS, AY 2017-18 AND 2018-19²⁰

| Institution | AY 2017-18 | AY 2018-19 |
|-------------------------------------|-----------------------|-----------------------|
| Total SUNY Recipients (%) | 17,108 (84%) | 21,027 (84%) |
| Total SUNY Money Awarded (%) | \$58,671,943.15 (85%) | \$84,024,747.47 (85%) |
| SUNY 4 Year Number of Recipients | 12,781 | 17,150 |
| SUNY 4 Year Amount of Money Awarded | \$47,887,648.86 | \$72,672,680.81 |
| SUNY 2 Year Number of Recipients | 4,327 | 3,877 |
| SUNY 2 Year Amount of Money Awarded | \$10,784,294.29 | \$11,352,066.66 |
| Total CUNY Recipients (%) | 3,350 (16%) | 4,073 (16%) |
| Total CUNY Money Awarded (%) | \$10,422,772.84 (15%) | \$14,911,391.48 (15%) |
| CUNY 4 Year Number of Recipients | 2,994 | 3,738 |
| CUNY 4 Year Amount of Money Awarded | \$9,616,379.95 | \$13,657,608.33 |
| CUNY 2 Year Number of Recipients | 356 | 335 |
| CUNY 2 Year Amount of Money Awarded | \$806,392.89 | \$1,253,783.15 |

The criteria of the Excelsior Scholarship should be reformed by easing its restrictive credit requirements, allow for the scholarship to be awarded during winter and summer sessions, end the practice of turning the award into a loan for students who lose eligibility, and remove the “last dollar” status of the award.

EXPAND AID PROGRAMS TO INDEPENDENT COLLEGES AND UNIVERSITIES

The Enhanced Tuition Awards (ETA) program provides tuition awards to students who are NYS residents attending a participating private college located in NYS. Recipients will receive \$6,000 through a combination of their TAP award, ETA award and a match from their private college. In AY 2018-19, New York awarded more than \$4.3 million to 2,744 students through this program.²¹

The Governor proposes \$7.6 million for the ETAP program for students attending independent colleges and universities, which is a \$389,000 increase from AY 2019-20. The income threshold for ETAP would increase in line with Excelsior to \$135,000 in AY 2020-21 and \$150,000 in AY 2021-22. **There should be state enhancement of Excelsior and ETAP, but an expanded TAP is a better vehicle.**

Secondly, the Bundy Aid program helps independent colleges and universities meet the needs of their students. After years of stagnant – and often declining – support, **it should be expanded consistent with the recommendations of the Commission on Independent Colleges and Universities (increase by 3 percent).**

RESTORE AND EXPAND CHILD CARE AT CUNY AND SUNY

The cost of childcare can be a significant barrier toward accessing a degree. According to the Institute for Women’s Policy Research, just 8 percent of single mothers who enroll in college graduate with an associate or bachelor’s degree within six years, compared with 49 percent of women students who are not mothers.²² Single mothers with only a high school diploma are over three times as likely to live in poverty as single mothers with a bachelor’s degree.²³ While the average cost of private childcare or daycare in NYC can be prohibitively expensive (roughly \$25,000 a year²⁴), enrolling a child in daycare at CUNY can cost as little as \$5 a day. It’s unsurprising that access to affordable childcare increases degree completion rates. A study by Monroe Community College found that student parents that used the childcare center there were 30 percent more likely to stay in school.

CUNY and SUNY childcare centers are a powerful tool for socio-economic mobility. While, as of 2015, fewer than half of two year and four-year colleges nationwide had childcare centers, nearly every CUNY campus has one. The Executive Budget cuts childcare at SUNY by over \$1 million dollars and by \$902,000 at CUNY. **There must be a restoration of the over \$1 million cut to SUNY childcare and \$902,000 cut to CUNY childcare centers, and the state must go further to expand child care funding.**

SUPPORT ADDITIONAL STUDENT SERVICES FOR LOW INCOME STUDENTS

NYPIRG commends the work of CUNY and SUNY staff, often in collaboration with our campus NYPIRG chapters, student governments and the community at large, to stock and maintain food pantries in compliance with the mandate from Governor Cuomo that every CUNY and SUNY campus create food pantries. That mandate came in part as a response to a recent report by groups, including NYPIRG entitled Hunger on Campus. The report looked at food insecurity on campus, and how that may undermine the educational success of untold thousands of students.²⁵ Consistent with prior studies, 48 percent of survey respondents reported food insecurity in the previous 30 days. **The state should support operating expenses food pantries across campuses at SUNY and CUNY.**

Textbook costs are outrageous. Average costs are routinely \$1,000 a year. For the third year in a row, the state provided \$8 million to SUNY and CUNY (\$4 million to each system) for programs to make affordable textbook options available to students, such as open source textbooks. These are high-quality college texts with an "open" copyright license allowing the material to be freely accessed, shared and adapted. Open textbooks are typically distributed online at no cost and can be purchased in a variety of other print and digital formats at a low cost, including hard bound copies. On average, using open textbooks in place of traditional textbooks saves 80%.

Open source textbooks have many similarities with traditional textbooks. The educational content is written and reviewed by experts, and it aims to cover a similar scope and sequence of topics. Many even come with support

materials like online homework, test banks, and supplemental videos. **The state should continue its funding of OER at \$4 million at SUNY and \$4 million at CUNY.**

Mental health services are important, and the \$500,000 in funding cut in the Executive Budget should be restored. Mental health service costs should not be borne by students via increased fees.

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Endnotes

¹ State University of New York, 2019-20 Executive Budget Testimony, Chancellor Kristina Johnson, January 28, 2019, <https://www.suny.edu/govrelations/state/testimony/2019-20-budget/>.

² Abel, Jaison R. and Richard Deitz, *Liberty Street Economics*, “Despite Rising Costs, College Is Still a Good Investment,” June 5, 2019, <https://libertystreeteconomics.newyorkfed.org/2019/06/despite-rising-costs-college-is-still-a-good-investment.html>.

³ Rothwell, Jonathan. “What colleges do for local economies: A direct measure based on consumption.” *Brookings*, July 28, 2016, www.brookings.edu/research/what-colleges-do-for-local-economies-a-direct-measure-based-on-consumption/.

⁴ Buffie, Nick, and Tillie McInnis. “Highest to Lowest Share of Blue Collar Jobs By State,” April 10, 2017, <https://bluecollarjobs.us/2017/04/10/highest-to-lowest-share-of-blue-collar-jobs-by-state/>.

⁵ Information obtained for New York State Higher Education Services Corporation Annual Reports.

⁶ City University of New York, 2019-2020 Operating Budget Request and Four-Year Financial Plan; January 14, 2019, http://www2.cuny.edu/wp-content/uploads/sites/4/page-assets/about/administration/offices/budget-and-finance/FY2020-Budget-Request_for-OBF-Site-1.pdf.

⁷ While the TAP award was increased, the rate at which colleges were reimbursed remained at \$5,000. The difference between tuition at SUNY and CUNY and a \$5,000 TAP award is the TAP Gap that must be covered by the local campus for eligible college students.

⁸ SUNY tuition for Academic Year (AY) 2010-2011 was \$4,970, and CUNY was \$4,830. The so-called “rational tuition” policy allowed for \$300 annual increases for 5 years, or a total of \$1,500 by July 2016. NY’s Final State Budget for AY 2017-2018, 2018-2019, and 2019-2020 allowed for three \$200 dollar increases, bringing tuition to \$7,070 at SUNY and \$6,930 at CUNY, hence tuition has increased 42%. <http://www.suny.edu/smartrack/tuition-and-fees/> and <http://www2.cuny.edu/financial-aid/tuition-and-college-costs/tuition-fees>. Calculations performed by NYPIRG.

⁹ NYPIRG. We relied on various data sources to come up with our estimated costs. These sources are from both the state and federal governments. In addition, in the instances in which the data was incomplete for an academic year, we relied on the previous year’s numbers (e.g. enrollments) in order to complete our calculations. We did not include tuition revenues generated during summer, winter, or other non-traditional sessions. We did not include tuition revenues generated by students attending part-time during any part of the academic year. We did not include revenues from tuition increases for the current academic year, that data was not readily available. It is safe to assume that our estimate will increase once the current academic year’s information become available, and if tuition revenues generated by part-time students and students attending public college during summer, winter, and non-traditional sessions were easily accessible and included.

¹⁰ Citizens Budget Commission, “NYS Trends During the Cuomo Administration,” Fiscal years 2011-2019, October 18, 2018, <https://cbcny.org/research/nys-trends-during-cuomo-administration>.

¹¹ New York State Data Portal, “NY Open Data,” <https://data.ny.gov/Education/Headcount-Enrollment-by-Student-Level-and-Student-/4fyc-bf8i/data>.

¹² While Nassau Community College had the biggest enrollment decline, nearly 5,000 full time students, Clinton County Community College had the largest percentage decline in enrollment, losing 55 percent of its full-time students. For the purposes of this analysis we did not include the Fashion Institute of Technology, which is unique among 2-year schools and which did have a slight increase during this period.

¹³ The College Board, <https://research.collegeboard.org/trends/college-pricing/figures-tables/published-district-tuition-and-fees-public-two-year-institutions-state>.

¹⁴ State University of New York’s Office of Opportunity Programs, <http://system.suny.edu/oop/>.

¹⁵ Retention Rates for First Time, Full Time Students in a Program: SUNY Data Analysis and Trends SUNY System Administration Office of the Provost May 2014 Draft <https://www.suny.edu/media/suny/content-assets/documents/powerofsuny/performance-management-system/DRAFT-Retention-Rates-Background-Report.pdf>

¹⁶ *Supra* 27.

¹⁷ SUNY Fast Facts, https://www.suny.edu/media/suny/content-assets/documents/FastFacts_2018-Flyer.pdf

¹⁸ City University of New York, “Significant Increases in Associate Degree Graduation Rates: CUNY Accelerated Study in Associate Programs (ASAP) (March 1, 2018),” see: http://www1.cuny.edu/sites/asap/wp-content/uploads/sites/8/2018/03/ASAP_Program_Overview_March_2018.pdf.

¹⁹ Breidenbach, M., “Excelsior college scholarship denied to half of SUNY, CUNY applicants in first year,” *Syracuse.com*, <https://www.syracuse.com/news/2019/08/excelsior-college-scholarship-denied-to-half-of-suny-cuny-applicants-in-first-year.html>.

²⁰ New York State Data Portal, “NY Open Data,” <https://data.ny.gov/en/browse?q=excelsior+scholarship>.

²¹ New York State Higher Education Services Corporation, AY 2018-19.

²² Institute for Women’s Policy Research, “Investing in Single Mothers’ Higher Education: Costs and Benefits to Individuals, Families, and Society.” <https://iwpr.org/publications/investing-single-mothers-higher-ed/>.

²³ Institute for Women’s Policy Research, “Investing in Single Mothers’ Higher Education: Costs and Benefits to Individuals, Families, and Society.” <https://iwpr.org/publications/investing-single-mothers-higher-ed/>.

²⁴ Bernard, Tara Siegel. “Choosing Child Care When You Go Back to Work.” *The New York Times*, The New York Times, 22 Nov. 2013, www.nytimes.com/2013/11/23/your-money/choosing-child-care-when-you-go-back-to-work.html.

²⁵ NYPIRG, Hunger on Campus, The Challenge of Food Insecurity for College Students, October 2016, http://www.nypirgstudents.org/reports/Hunger_on_Campus_NYPIRG.pdf, accessed November 30, 2016.