

May 8, 2023

The Honorable Debbie Stabenow
Chair, U.S. Senate Committee on Agriculture
Washington, D.C. 20510

The Honorable John Boozman
Ranking Member, U.S. Senate Committee on
Agriculture
Washington, D.C. 20510

The Honorable Glenn “GT” Thompson
Chair, House Committee on Agriculture
Washington, D.C. 20515

The Honorable David Scott
Ranking Member, House Committee on
Agriculture
Washington, D.C. 20515

Dear Chair Stabenow, Ranking Member Boozman, Chair Thompson, and Ranking Member Scott:

On behalf of the 110 undersigned organizations representing advocates, students, institutions of higher education, associations, researchers, labor unions, civil rights organizations, and service providers, we urge you to address the urgent and growing crisis of hunger and food insecurity among students in higher education as you reauthorize the nutrition title of the Farm Bill. **It is essential for Congress to remove barriers to the Supplemental Nutrition Assistance Program (SNAP) that prevent college students from accessing critical food assistance and reform the program’s complex eligibility rules to support postsecondary attainment and workforce development.**

Today’s economy demands postsecondary credentials or degrees for jobs that pay family-supporting wages. And when students can meet their basic needs, they are better able to focus on their academics, care for their loved ones, maintain their physical and mental health, complete a college degree or credential, and secure a job that leads to long-term economic security for themselves and their families. Yet today, one in three college students (34%) report having low or very low food security, and another 13% report only marginal food security. Black, Latine, Native and Indigenous students, first-generation students, Pell Grant recipients, parenting students, and LGBTQ+ students all have disproportionately higher levels of food insecurity.¹ The food insecurity rate among college students is three times higher than among all U.S. households.²

Students who are food insecure are more likely to have a lower grade point average, take a reduced course load, and consider dropping out of college.³ Research has also documented that college food insecurity is strongly associated with mental and behavioral health challenges, including depression and anxiety.⁴

¹ The Hope Center for College, Community, and Justice. (2021). [The Hope Center Basic Needs Survey: Basic Needs Insecurity During the Ongoing Pandemic](#).

² According to the most recent estimates, 10.2% of U.S. households were food insecure at some point in 2021. Source: U.S. Department of Agriculture. (2022, September). [Household Food Security in the United States in 2021](#).

³ See, e.g., Martinez et. al. (2020). [No food for thought: Food insecurity is related to poor mental health and lower academic performance among students in California’s public university system](#). J. Health Psychol.; Raskind et. al. (2019). [Food insecurity, psychosocial health and academic performance among college and university students in Georgia, USA](#). Public Health Nutrition.

⁴ See, e.g., Oh et. al. (2022). [Food insecurity and mental health among young adult college students in the United States](#). J Affective Disorders; Kim, Y. & Murphy, J. (2023). [Mental Health, Food Insecurity, and Economic Hardship among College Students during the COVID-19 Pandemic](#). Health & Social Work.

Basic needs insecurity severely threatens students' ability to persist in and complete higher education, and contributes to students leaving college without a degree or credential, often with significant student debt and uncertain job prospects.

We applaud the action Congress took under the bipartisan *Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA)* to simplify eligibility for SNAP for students already at risk of food insecurity, including for those who do not have any family financial support for their college education and who are eligible for federal or state work-study. Timely action by the federal government helped students and families afford basic necessities, stay enrolled, and weather the massive economic disruptions of the past few years. Without it, millions more students may have dropped out of higher education altogether, permanently imperiling our nation's economy. These flexibilities should be maintained and expanded.

However, student food insecurity existed long before the pandemic, and emerging evidence confirms that students and families face dire challenges again.⁵ Basic needs insecurity has worsened as federal supports have expired and consumers struggle to afford higher prices for food and other groceries. This is coming at a time when enrollment, particularly at community colleges, remains well below pre-pandemic levels.⁶ As a result, this reauthorization of the Farm Bill occurs at a critical time for students, families, and institutions of higher education.

Students face substantial barriers to SNAP due to a maze of complex, burdensome, and confusing rules and restrictions that specifically target those who enroll in higher education.⁷ The current SNAP student rules require students with low incomes to either work 20 hours per week on top of the time they spend in class, studying, meeting with faculty or academic advisors, and completing assignments—or meet a series of complicated exemptions. These rules make many students experiencing food insecurity choose between their academic coursework and putting food on the table through employment which can diminish their chances of completing a degree or credential. Research has indicated that students who work intensively are more likely to fall behind in class, receive lower grades, and stop out of college; for low-income students, working more than 15 hours per week is associated with a 22 percentage point decrease in bachelor's degree attainment.⁸

The SNAP restrictions are also based on outdated and harmful assumptions about a student population that no longer exists; students today are generally older and much more likely to be living independently, purchasing their own food and groceries, and taking care of dependent children than they were when the Farm Bill introduced barriers to SNAP for college students.⁹ The current SNAP student rules harm student success.

⁵ See, e.g., Fishman, R. and Cheche, O. (2023, February). [Why Didn't the Community College Students Come Back?](#) New America Foundation; Wheaton, L. and Kwon, D. (2022, August). [Effect of the Reevaluated Thrifty Food Plan and Emergency Allotments on Supplemental Nutrition Assistance Program Benefits and Poverty](#). Urban Institute.

⁶ Vise, D. and Lonas, L. (2023, April). [Community college enrollment plunges nearly 40 percent in a decade](#). The Hill.

⁷ Center for Law and Social Policy. (2021). [Frequently Asked Questions About SNAP and Students](#).

⁸ ACT Center for Equity for Learning. (2017, August). [Who Does Work Work For? Understanding Equity in Working Learner College and Career Success](#).

⁹ See, e.g. Higher Learning Advocates. (2022). [101: Today's Students](#); Lumina Foundation. (2022). [Today's Student](#).

Additionally, many students are unaware that they are eligible for SNAP due to the complexity of eligibility requirements that states, institutions of higher education, and federal agencies struggle to communicate effectively to students.¹⁰ As a result of these burdensome and complex rules, an alarming portion of eligible students never receive benefits; the Government Accountability Office found that 57% of students who are likely food insecure and income-eligible for SNAP do not receive benefits and concluded that complicated program eligibility was largely to blame.¹¹ Other research estimates that just 18% of college students are eligible for SNAP, and only 3% receive benefits.¹² Less than one in five students who experience basic needs insecurity report receiving SNAP.¹³ By comparison, 82% of all eligible people in the U.S. receive SNAP benefits.¹⁴ Overall, the SNAP student rules prevent the program from helping students obtain a degree or credential and long-term economic security.

The CRRSAA flexibilities will expire for new applications beginning one month after the public health emergency declaration sunsets, now expected to occur on May 11. At that time, many students with low incomes will begin losing access to SNAP. Letting these flexibilities expire will dramatically increase the likelihood that students go hungry or become food insecure, particularly when families are struggling with higher food costs due to inflation. Congress must reduce inefficient administrative burdens in the SNAP program for students, better align the program to the nation's education, economic, and workforce needs, and address the persistent and widespread problem of food insecurity on campuses nationwide.

As you reauthorize the Farm Bill this year, **we urge you to remove restrictions in SNAP that create barriers for college students with low incomes to access food assistance and to expand the student exemptions to those at risk of food insecurity.** There are several common-sense models for simplifying and expanding SNAP student rules, including:

- **Streamline SNAP eligibility** by allowing enrollment in higher education to satisfy activity and participation requirements. For example, the *EATS Act* would amend the Food and Nutrition Act to include higher education attendance as a qualification for SNAP students who meet the program's income requirements;
- **Maintain CRRSAA provisions** providing access to SNAP for students who do not have the financial means to contribute out-of-pocket to higher education (including students with a \$0 Expected Family Contribution or a Student Aid Index of less than or equal to 0) and those who are eligible for federal or state work-study, to qualify for food assistance without being subject to additional activity and participation requirements, as proposed in part by the *Student Food Security Act*;

¹⁰ The Hope Center for College, Community, and Justice. (2022, July). [Best Kept Secrets: The Federal Government Expanded Snap Eligibility For College Students, But Many Never Heard About It.](#)

¹¹ U.S. Government Accountability Office. (2019). [Food insecurity: Better information could help eligible college students access federal food assistance benefits.](#)

¹² Young Invincibles (2018). [Rethinking SNAP Benefits for College Students.](#)

¹³ *Supra*, see note 1.

¹⁴ U.S. Department of Agriculture. (2023, February). [Reaching Those in Need: Estimates of USDA's SNAP Program Participation Rates in 2019.](#)

- **Expand student exemptions** to include populations of students at high risk of food insecurity who meet the income eligibility thresholds, including students who have dependent children of their own under the age of 18; students who act as family caregivers; students and families enrolled in other means-tested benefits; Pell Grant recipients; and students considered to be financially independent for purposes of federal student aid (as proposed in part by the *Student Food Security Act* and the *College Student Hunger Act*), including veterans and servicemembers, former foster youth, and students experiencing, or at risk of, homelessness;

In addition to reforming the SNAP student exemptions, we urge you to ensure that all students who meet SNAP eligibility criteria are able to access and use their benefits. To facilitate this, Congress should:

- **Remove administrative burdens** such as the mandatory interview requirement that impedes access to SNAP and cause many otherwise eligible households, including college students, to become food insecure, leverage student data from the Free Application for Federal Student Aid (FAFSA) to identify potentially-eligible students, streamline or pre-qualify SNAP enrollment, and modernize the benefit application and delivery processes;
- **Clarify and facilitate the ability of institutions of higher education to accept SNAP on campus**, including on-campus stores that sell grocery items, and by allowing more students to use SNAP for prepared meals on campus, particularly at institutions serving a high population of students with low incomes; and
- **Require proactive outreach, coordination, and data-sharing** among and between the U.S. Departments of Agriculture and Education, Internal Revenue Service, state SNAP agencies, and institutions of higher education to facilitate enrollment of potentially eligible students into SNAP.

Streamlining access to food assistance for students is a sound investment for taxpayers. Students in higher education already submit income and citizenship documentation as part of the FAFSA and are subject to risk-based verification of that information. Students applying for SNAP then submit household income, employment, and citizenship documentation that is cross-checked against numerous federal databases.

Providing more flexibility for students experiencing, or at risk of, food insecurity to access SNAP will promote student food security, support educational attainment, better align SNAP with federal financial aid and other public benefit programs, and reduce bureaucratic administrative barriers.

We are grateful for the opportunity to submit these recommendations. The Farm Bill represents a significant opportunity to address hunger and food insecurity for students and their families. We look forward to working with you over the coming months on these critical efforts.

Sincerely,

National Organizations

The Hope Center at Temple University
1000 Women Strong
America Forward
American Association of University Professors
American Federation of Teachers
Benefits Data Trust
Center for First-generation Student Success
Center for Higher Education Policy and Practice
Center for Law and Social Policy
The Education Trust
First Focus on Children
Food Research & Action Center (FRAC)
Generation Hope
Higher Learning Advocates
Hildreth Institute
InsideTrack
Institute for Higher Education Policy (IHEP)
Jobs for the Future
March On / Future Coalition
National Association of Independent Colleges and Universities
National College Attainment Network
National Education Association
National Student Legal Defense Network
Nazun
Rise
State Higher Education Executive Officers Association (SHEEO)
Student Public Interest Research Groups (PIRGs)
Swipe Out Hunger
The Today's Students Coalition
uAspire
UnidosUS
Young Invincibles

Regional, State, Local Organizations & Institutions of Higher Education

Amherst Survival Center
Anti-Hunger & Nutrition Coalition (WA)
Associated Students of Tacoma Community College
Associated Students of the University of California, Irvine
Associated Students of the University of Washington
Benjamin Franklin Cummings Institute of Technology
Binghamton University, State University of New York
California Association of Food Banks
Cal State Student Association
Campaign for College Opportunity
Center for Healthy Communities
Central Massachusetts Center on Food Equity
Children's Alliance (WA)

Community Action Agency of Butte County, Inc.
Community Action Partnership of Orange County
Dallas College
Faith Action Network
Feeding New York State
Food Bank of Contra Costa and Solano
Food Bank of the Southern Tier
Food Bank of Western Massachusetts
Food for People
GRACE/End Child Poverty California
The Greater Boston Food Bank
Greater Philadelphia Coalition Against Hunger
The Gubbio Project
Hunger Free Colorado
Hunger Free Vermont
Hunger Solutions Minnesota
Hunger Solutions New York
The Idaho Hunger Relief Task Force
LeadMN: College Students Connecting for Change
Long Beach City College, Basic Needs
Los Angeles Regional Food Bank
Massachusetts Law Reform Institute
Massachusetts Teachers Association
Merrimack Valley Food Bank, Inc.
Michigan Community College Association
Northwest Harvest
Nourish California
Ohio Student Association
One Family
Oregon Student Association
Project Bread
Rutgers University Student Assembly
Saint Paul College
San Diego Hunger Coalition
San Francisco-Marin Food Bank
Second Harvest Food Bank of Orange County (CA)
SLO Food Bank
South Carolina Appleseed Legal Justice Center
The State University of New York (SUNY)
Stella's Girls
Stony Brook University
Tacoma Urban League
United Way of King County
University District Food Bank (WA)
University at Albany, State University of New York
University at Buffalo
University of California Agriculture and Natural Resources
University of California, Berkeley
University of California, San Diego
University of California, Santa Cruz

University of California Student Association
University of California System
University of Michigan - Ann Arbor
University of Michigan - Dearborn
University of Michigan - Flint
University of Minnesota Undergraduate Student Government
University of Oregon
Urban League of Metropolitan Seattle
URI Feinstein Center for a Hunger Free America
Washington Student Achievement Council
Washington Student Association
Western Washington University
William E. Morris Institute for Justice
Worcester County Food Bank
Worcester Food Policy Council