April 2, 2024

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 168 undersigned organizations representing advocates, students, institutions of higher education, national and state higher education associations, labor unions, civil rights organizations, researchers, and service providers, we urge you to address the urgent crisis of food insecurity among students in higher education in the Farm Bill. It is essential for Congress to overhaul the complex eligibility rules in the Supplemental Nutrition Assistance Program (SNAP) that undermine federal and state investments in higher education and workforce development and make it harder for people with low incomes to combine work with education to achieve economic security.

Additionally, we urge you to remove administrative burdens and barriers that prevent many eligible students from receiving SNAP benefits, and require greater coordination and outreach across federal agencies, states, and institutions of higher education to facilitate enrollment among eligible students. These reforms must be a top priority for bipartisan conversations and negotiations this year.

A dynamic, productive, and equitable economy requires more postsecondary credentials and degrees, particularly among students and families who are disproportionately left behind in our economy. Increasing postsecondary attainment depends on the ability of people to meet their basic needs, including food, when they are enrolled in school. Students who can meet their basic needs 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. Every level of postsecondary education is correlated with improved social, economic, and health outcomes, including higher earnings, lower unemployment and poverty rates, and improved education outcomes for children.

---


Yet too many people are unable to access and persist through higher education because they don’t have enough money and other resources to afford basic needs, including nutritious and consistent food, despite the fact that most students work while enrolled. Nationally representative federal data released in 2023 reveal that more than 4.3 million students in higher education experience food insecurity, and undergraduate students experience food insecurity and hunger at twice the rate of all U.S. households. Using the U.S Department of Agriculture (USDA) scales, college-administered surveys and other research have also consistently documented much higher levels of food insecurity among first-generation students, Pell Grant recipients, Black, Latine, Native and Indigenous students, and parenting students.

Basic needs insecurity severely threatens students’ ability to complete higher education, harms economic growth, and contributes to people leaving college without a degree or credential, often with significant student debt and poorer job prospects. 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. Food insecurity is also strongly associated with mental and behavioral health challenges, including depression and anxiety, among college students.

We applaud Congress’ bipartisan recognition of student needs during the COVID-19 pandemic when it simplified eligibility for SNAP for students already at risk of food insecurity, including for those who had a $0 “Expected Family Contribution,” or EFC (now the Student Aid Index, or SAI)—meaning they did not have any family financial support for their college education—as well as those who were eligible for federal or state work-study. This timely bipartisan action prevented untold numbers of students from dropping out of higher education altogether and further imperiling our nation’s economy.

Unfortunately, the expiration of these flexibilities in mid-2023, during a time of higher food and grocery prices, has diminished the ability of students to afford their education. Student food insecurity existed long before the pandemic, and students and families now face dire challenges once again. While campuses across the country have attempted to address this issue by creating food pantries and closets, these services are often only able to meet a fraction of the demand and do not provide a permanent solution. These unacceptable realities persist at a time when overall college enrollment remains over 7


4 During 2020, when the National Postsecondary Student Aid Survey was fielded, 23% of undergraduates, and 12% of graduate students were food insecure. Comparatively, 10.5% of U.S. households were food insecure at some point in 2020. Source: U.S. Department of Agriculture. (2023, October). Household Food Security in the United States in 2020.


6 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.


percent below pre-pandemic levels, including nearly 20 percent below pre-pandemic levels at community colleges.9

The SNAP student rules are confusing, counterproductive, and harmful for students in higher education. Current rules require students with low incomes who attend college more than half-time to either consistently 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 convoluted exemptions. 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.10 The rules also make it difficult for SNAP recipients who are not enrolled in higher education from being able to go back to school for a college degree or credential that leads to a better job and more earnings. Doing so would risk them losing food assistance, due to the penalties of the SNAP student rules.

The SNAP restrictions are based on outdated assumptions about a student population that has changed dramatically. Low-income students are disproportionately first gen, BIPOC, older, and taking care of dependent children, and are often enrolled in 2- and 4-year public colleges focused on career and technical education skills. The skyrocketing costs of higher education saddles them with debt, compels them to work long hours, and forces many to forgo post secondary education beyond an associates degree or short term certificate program. The student population and educational attainment are significantly different than they were when the Farm Bill imposed draconian barriers to SNAP for college students nearly 50 years ago.11 Misconceptions about the nature of students’ needs and deservingness have had damaging consequences, pushing many away from higher education and economic stability. People who are unable to complete postsecondary credentials are often relegated to low wage jobs while people with more education often experience higher incomes and use SNAP less.12

As you reauthorize the Farm Bill, we urge you to remove restrictions in SNAP that create barriers for college students with low incomes to access food assistance. This will 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. There are several common-sense bipartisan opportunities to improve the SNAP restrictions on postsecondary education, including:

- **Streamline SNAP eligibility** by allowing enrollment in higher education to satisfy activity and participation requirements, and putting students with low incomes on equal footing with other individuals who are eligible for SNAP. Principally, Congress should incorporate the *Enhancing Access to SNAP (EATS) Act* into the Farm Bill to remove harmful “work-for-food” requirements on students;

---

9 National Student Clearinghouse (2023). *Current Term Enrollment Estimates: Spring 2023*
- **Reinstitute bipartisan 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 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*;

- **Expand and simplify student exemptions** to include populations of students at high risk of food insecurity who meet the income eligibility thresholds, including all students who have dependent children of their own; students who act as family caregivers; Pell Grant recipients; students and families enrolled in other public benefit programs; 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, Congress must address the administrative burdens in the SNAP program and ensure that all students who meet SNAP eligibility criteria are able to access and use their benefits. Currently, many eligible students are unaware that they could get SNAP as a direct result of the complexity of the student rules. Less than one in five students who experience basic needs insecurity report receiving SNAP. By comparison, 82 percent of all eligible people in the U.S. receive SNAP benefits.15

To improve outreach, awareness, and enrollment, 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;

- **Require and provide funding for 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; and

---


14 Supra, see note 5.

• Require state SNAP agencies to collect and disaggregate data on the number of SNAP recipients that are currently enrolled in higher education and annually report that data to USDA, given the current lack of state or national data on student participation in SNAP.

Streamlining access to food assistance for students is a sound and worthy investment that promotes food security, supports educational attainment, better aligns SNAP with federal financial aid and other public benefit programs, and reduces bureaucratic administrative barriers.

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

Sincerely,

National Organizations
The Hope Center at Temple University
Alliance for a Just Society
American Association of State Colleges and Universities (AASCU)
American Federation of Teachers (AFT)
Association of Community College Trustees (ACCT)
Believe in Students
Benefits Data Trust
Bread for the World
Campus Compact
Center for First-generation Student Success at NASPA
Center for Higher Education Policy and Practice at SNHU
Center for Law and Social Policy (CLASP)
Center for Science in the Public Interest
Equal Rights Advocates
Food Research and Action Center (FRAC)
Generation Hope
Higher Learning Advocates
Hildreth Institute
Institute for Higher Education Policy (IHEP)
Jobs for the Future
MAZON: A Jewish Response to Hunger
National Association of Independent Colleges and Universities (NAICU)
National College Attainment Network (NCAN)
National Education Association
National Rural Education Association
New America Higher Education Program
Rise
Service Employees International Union (SEIU)
State Higher Education Executive Officers Association (SHEEO)
Student Basic Needs Coalition
Student Defense
Student Veterans of America
Swipe Out Hunger
Regional, State, Local Organizations & Institutions of Higher Education

Alameda County Community Food Bank
AFT Local 212
Anoka Technical College
Arcadia University
Basic Needs Oregon
Bruin Parenting Scholars
Cabrillo College Horticulture and Agriculture Technology Center
California Association of Food Banks
California Competes: Higher Education for a Strong Economy
California Student Aid Commission
Called to Respond LLC
CAP OC - OC Food Bank
Carroll Community College
Cedar Crest College
Center for Economic Justice & Action (CEJA)
Center for Healthy Communities
Central Arizona College
Central Lakes College Food Pantry
Children's Institute
City Colleges of Chicago
Coastal Foodshed
College Unbound
Community Action Committee
Communities for Our Colleges
Council Of Presidents: WA’s Public Four Year College and Universities
Dallas College
D.C. Hunger Solutions
Doing Good Works
EatWell
EduOptimists LLC
Erie Center for Arts & Technology
Farmlink Project
FAST Fund at Milwaukee Area Technical College
Feeding New York State
Feeding Texas
FIND Food Bank
Florida Impact
Florida Policy Institute
Food Bank of Contra Costa and Solano
Food Bank of Western Massachusetts
Food for People
Food Share Ventura County
Food Systems Collaborative
Foster Greatness
GLIDESf
GRACE/End Child Poverty California
Grayson College
The Greater Boston Food Bank
Greater Chicago Food Depository
Greater Kansas City Food Policy Coalition
Greater Philadelphia Coalition Against Hunger
Greater Twin Cities United Way
HACC: Central Pennsylvania’s Community College
Hamline Food Resource Center
Hunger Free Colorado
Hunger Free Oklahoma
Hunger Free Vermont
Hunger Solutions New York
Hunger Task Force
John Burton Advocates for Youth
Johnson College
Just Harvest
Kutztown University of Pennsylvania
Laredo College
Laurel Highlands Workforce & Opportunity Center
LeadMN
Linn-Benton Community College
Los Angeles Regional Food Bank
Luzerne County Community College KEYS Program
Maryland Hunger Solutions
Maryland Public Health Association (MdPHA)
Massachusetts Law Reform Institute
Michigan Community College Association
Minneapolis Community and Technical College
Minnesota Private College Council
Minnesota State College Southeast
Minnesota State Community & Technical College
Minnesota State University Association of Administrative and Service Faculty
Montgomery County Community College
New Mexico Basic Needs Consortium
North Hennepin Community College
Northwest Harvest
Nourish California
One Family
Oregon Higher Education Coordinating Commission
Oregon Student Association
Partners for a Hunger-Free Oregon
Pittsburgh Council on Higher Education (PCHE)
Pittsburgh Scholar House
Pittsburgh Technical College
Postsecondary Basic Needs Coalition
Project SPARC
Saint Paul College
San Bernardino Community College District
San Francisco-Marin Food Bank
Second Harvest Food Bank of Orange County (CA)
Second Harvest Heartland
Second Harvest of Silicon Valley
Spartan Food Security Council
Southwest Minnesota State University
St. Anthony's Food Pantry
The State University of New York (SUNY) System
Tennessee Justice Center
Tusculum University Center for Civic Advancement
Umpqua Community College
UCSC Student Parent Organization
United Way of King County
University District Food Bank
University of California System
University of California Agriculture and Natural Resources
University of California, San Diego
University of California, Santa Cruz
University of Massachusetts, Lowell
University of Oregon
University of Washington
URI Feinstein Center for a Hunger Free America
Vermont State Colleges System
Vida Green Acre Family Farm
Washington Anti-Hunger & Nutrition Coalition
Washington State Board for Community and Technical Colleges
Washington State University
Washington Student Achievement Council (WSAC)
Washington Student Association
Western Oregon University
Western Washington University
Westmoreland County Community College
Worcester County Food Bank
William E. Morris Institute for Justice