

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.<sup>1</sup> 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.<sup>2</sup>

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<sup>1</sup> The Institute for College Access and Success. (2023). [Modernizing the Supplemental Nutrition Assistance Program \(SNAP\) to Improve Self-Sufficiency](#); Georgetown Center on Education and the Workforce. (2023). *After Everything: Projections of Jobs, Education, and Training Requirements through 2031*.

<sup>2</sup> See, e.g., Trostel, P. (2017). [It's Not Just the Money: The Benefits of College Education to Individuals and to Society](#). Lumina Foundation.

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,<sup>3</sup> and **undergraduate students experience food insecurity and hunger at twice the rate of all U.S. households.**<sup>4</sup> 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.<sup>5</sup>

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.<sup>6</sup> Food insecurity is also strongly associated with mental and behavioral health challenges, including depression and anxiety, among college students.<sup>7</sup>

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.<sup>8</sup> 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

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<sup>3</sup> McKibben, B., Wu, J., and Abelson, S. (2023, August). [New Federal Data Confirm that College Students Face Significant—and Unacceptable—Basic Needs Insecurity](#). The Hope Center at Temple University.

<sup>4</sup> 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](#).

<sup>5</sup> The Hope Center at Temple University. (2021, March). [The Hope Center Survey 2021: Basic Needs Insecurity During the Ongoing Pandemic](#); Trellis Company. (2023, May). [Student Financial Wellness Survey, Fall 2022](#); Community College Survey of Student Engagement. (2022, October). [Mission critical: The role of community colleges in meeting students' basic needs](#).

<sup>6</sup> 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.

<sup>7</sup> 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.

<sup>8</sup> See, e.g., Khalil, A. and Morga, A. (2023, July). [College Students Struggling with Hunger Face Potential Loss of Food Stamp Benefits](#). Associated Press; 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.

percent below pre-pandemic levels, including nearly 20 percent below pre-pandemic levels at community colleges.<sup>9</sup>

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.<sup>10</sup> 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.<sup>11</sup> 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.<sup>12</sup>

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;

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<sup>9</sup> National Student Clearinghouse (2023). [Current Term Enrollment Estimates: Spring 2023](#).

<sup>10</sup> ACT Center for Equity for Learning. (2017, August). [Who Does Work Work For? Understanding Equity in Working Learner College and Career Success](#).

<sup>11</sup> See, e.g. Higher Learning Advocates. (2023). [101: Today’s Students](#); Lumina Foundation. (2022). [Today’s Student](#).

<sup>12</sup> See, e.g. Dickinson, Maggie. (2021, October). [SNAP, campus food insecurity, and the politics of deservingness](#). *Agriculture and Human Values*, 2022;39(2):605-616.

- **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.<sup>13</sup> Less than one in five students who experience basic needs insecurity report receiving SNAP.<sup>14</sup> By comparison, 82 percent of all eligible people in the U.S. receive SNAP benefits.<sup>15</sup>

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

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<sup>13</sup> U.S. Government Accountability Office. (2019). [Food insecurity: Better information could help eligible college students access federal food assistance benefits.](#)

<sup>14</sup> *Supra*, see note 5.

<sup>15</sup> U.S. Department of Agriculture. (2023, February). [Reaching Those in Need: Estimates of USDA's SNAP Program Participation Rates in 2019.](#)

- **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

The Education Trust  
The Institute for College Access & Success (TICAS)  
Third Way  
Today's Students Coalition  
UnidosUS  
uAspire  
Young Invincibles

**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