

November 4th, 2024

The Honorable Thomas J. Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Jefferson Drive, SW  
Washington, DC 20024

The Honorable Miguel A. Cardona  
Secretary of Education  
U.S. Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

Dear Secretaries Vilsack and Cardona:

On behalf of the **112** undersigned organizations representing a diverse coalition of advocates, students, institutions of higher education, national and state higher education associations, labor unions, researchers, food bank networks, and direct services organizations, **we urge the Biden-Harris Administration to use all of the regulatory and sub-regulatory tools at its disposal to improve the persistence and completion of students in education and training programs by addressing the ongoing crisis of food insecurity and hunger in higher education.** We thank the Administration for its longstanding work to improve the economic mobility and employability of students and families, including supporting their basic needs and expanding high-quality job training opportunities, and for setting the critical goal of ending hunger by the end of this decade.<sup>1</sup> **We ask that you take additional steps to enhance our workforce by simplifying access to the Supplemental Nutrition Assistance Program (SNAP) among eligible students and eliminating administrative burdens that prevent millions of low-income and food-insecure students from completing their programs when they don't have enough to eat.**

To build a dynamic and resilient workforce and create an economy that works for all Americans, we must increase postsecondary access and attainment. Research suggests that 85 percent of all good jobs by 2031 will be available to workers with postsecondary training or a credential,<sup>2</sup> making it urgent that we expand pathways for those who currently struggle to afford the rising costs associated with higher education and training. Students who can meet their basic needs, including consistent nutrition, are better able to focus on their coursework and job training, care for their loved ones, maintain their physical and mental health, complete a degree or credential, and secure a job that leads to long-term economic security. Conversely, research shows that food insecurity during college is a barrier to graduation and higher-degree attainment, particularly for first-generation students.<sup>3</sup>

Today, most students are working while enrolled in college, but far too many are still unable to complete higher education and job training because they do not have the resources to afford basic necessities, including consistent and nutritious food. **Federal data indicate that nearly 1-in-4 undergraduates in higher education experience food insecurity,<sup>4</sup> representing nearly 4 million students.** Rates of food

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<sup>1</sup> The White House. (2022, September). *Biden-Harris Administration National Strategy on Hunger, Nutrition, and Health*.

<sup>2</sup> Georgetown Center on Education and the Workforce. (2024). *The Future of Good Jobs: Projections through 2031*

<sup>3</sup> Wolfson JA, Insolera N, Cohen A, Leung CW. The effect of food insecurity during college on graduation and type of degree attained: evidence from a nationally representative longitudinal survey. *Public Health Nutrition*. 2022;25(2):389-397. doi:10.1017/S1368980021003104

<sup>4</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 for Student Basic Needs at Temple University.

insecurity are disproportionately high at community colleges, Historically Black Colleges and Universities (HBCUs), and other Minority Serving Institutions (MSIs), institutions which often do not have sufficient resources to address campus hunger on their own and where students may not have access to a meal plan.<sup>5</sup>

Unfortunately, students are often unable to access our nation’s most successful and impactful anti-hunger program, SNAP, even though undergraduate students experience food insecurity and hunger at twice the rate of all U.S. households.<sup>6</sup> Food insecurity rates are pronounced among community college students, parenting students, and Black & Latine students. Some low-income students can qualify for SNAP through a series of criteria known as “exemptions,” but the U.S. Government Accountability Office (GAO) recently found that **two-thirds (67%) of students who are likely eligible for SNAP are not receiving benefits.**<sup>7</sup> **Further, nearly 6-in-10 students who are *both* food-insecure *and* likely eligible for SNAP are still not receiving benefits—demonstrating the poor targeting of the program’s restrictions.**

These alarming figures result from the specific and overly burdensome eligibility rules that target students in the SNAP program. They also reflect the need to improve uptake among currently eligible students through more comprehensive guidance, removal of bureaucratic hurdles, and expanded outreach across institutions where students face the greatest challenge affording food and other basic needs, including community colleges, MSIs, and open-enrollment institutions.

The SNAP student rules also hold back our workforce. Many recipients of public benefits could most benefit from additional job training, including certificates and associate degrees at community colleges. But counterproductive SNAP policies effectively bar these would-be students from seeking higher education for fear of losing their benefits. While the SNAP Employment and Training (SNAP E&T) in theory aims to address this pitfall, most food insecure students are unable to participate, and most states have not maximized the flexibilities within SNAP E&T that could promote postsecondary training and attendance.<sup>8</sup>

We sincerely appreciate the steps your agencies took over the past few years to recognize the unique circumstances facing students in higher education. For example, we appreciate your recent guidance explaining how state grant agencies and institutions of higher education can leverage FAFSA data to connect students to public benefits like SNAP;<sup>9</sup> identifying students as a priority population for state

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<sup>5</sup> Ibid.; In addition, according to calculations from the National Postsecondary Student Aid Survey, only 3.3% of students enrolled at public 2-year institutions participated in a campus meal plan in 2020.

<sup>6</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>7</sup> U.S. Government Accountability Office. (2024, July 24). [Supplemental Nutrition Assistance Program: Estimated Eligibility and Receipt among Food Insecure College Students](#).

<sup>8</sup> Rios, L., Welton, C., and Huelsman, M. (2024, May). [The State of State Choices: A national landscape analysis of postsecondary eligibility restrictions and opportunities in SNAP, CCDF, and TANF](#). The Hope Center for Student Basic Needs at Temple University.

<sup>9</sup> U.S. Department of Education Office of Federal Student Aid. (2024, July 29). [\(GENERAL-24-93\) Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies](#).

SNAP agency outreach,<sup>10</sup> clarifying USDA’s Food and Nutrition Service (FNS) guidance around higher education enrollment definitions, work requirement rules,<sup>11</sup> and meal plans,<sup>12</sup> connecting students to SNAP prior to the expiration of public health emergency eligibility expansions,<sup>13</sup> and implementing competitive grants like the Basic Needs for Postsecondary Students program that help colleges enroll students in supports that address college hunger and other forms of basic needs insecurity.<sup>14</sup> We also applaud the Administration’s government-wide initiative to reduce administrative burdens and the “time tax” involved in many federal programs and services.<sup>15</sup>

There are also urgent, impactful, and evidence-based actions that your agencies can take to build on these valuable steps and expand awareness, access, and enrollment in SNAP for students and other support services that will address student food insecurity. We ask that your agencies announce the following administrative actions as soon as possible:

### **Improved Guidance on Student SNAP Eligibility and Enrollment**

- Issue guidance from FNS to state agencies, as well as institutions of higher education, clarifying the groups of students with low incomes that are eligible for SNAP under the current exemptions<sup>16</sup> without needing to qualify through the 20 hour-per-week work exemption. Many states and colleges have been confused by regional offices’ interpretation of the student rules’ statutory and regulatory provisions or have simply not made use of federal flexibilities.<sup>17</sup> Guidance should cover undergraduate, graduate, and professional students who meet SNAP income and citizenship requirements and address groups such as:
  - students enrolled in community college and other career-focused programs that result in high employability;
  - students awarded or anticipating a federal or state work-study position, including periods before or between formal placement; and
  - students with disabilities, including learning disabilities who may receive accommodations or take longer to graduate.
- Issue a comprehensive policy memo from FNS encouraging states to fully utilize their authority to implement the student exemptions in a manner that expands access to food support for students in higher education, and to revise their SNAP state plans accordingly, to address topics such as

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<sup>10</sup> U.S. Department of Agriculture Food and Nutrition Service (2023, February 1). [\*Supplemental Nutrition Assistance Program - FY 2024 Priority Areas for State Outreach Plans.\*](#)

<sup>11</sup> U.S. Department of Agriculture Food and Nutrition Service (2023, February 7). [\*Supplemental Nutrition Assistance Program - Institutions of Higher Education and Student Eligibility Rules.\*](#)

<sup>12</sup> U.S. Department of Agriculture Food and Nutrition Service (2022, June 2). [\*Supplemental Nutrition Assistance Program \(SNAP\) - Clarification on Treatment of Meal Plans at Institutions of Higher Education.\*](#)

<sup>13</sup> U.S. Department of Education. (2023, March 30). [\*End of the Public Health Emergency and Impact on Student Eligibility for Supplemental Nutrition Assistance Program \(SNAP\).\*](#)

<sup>14</sup> See U.S. Department of Education, [\*Basic Needs for Postsecondary Students Program.\*](#)

<sup>15</sup> Executive Office of the President, Office of Management and Budget, Office of Information and Regulatory Affairs. (2024.) [\*Burden Reduction Initiative.\*](#)

<sup>16</sup> Section 6(e) of the Food and Nutrition Act of 2008 (7 U.S.C. §2015(e)) and 7 CFR § 273.5 <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273>.

<sup>17</sup> *Supra*, See Note 8

the averaging of hours worked, excluding academic breaks and holidays, using TANF for benefits or services for students, and designating programs as equivalent to SNAP Employment & Training programs.<sup>18</sup>

- Remove USDA administrative burdens not required by federal statute that prevent otherwise-eligible students from enrolling in SNAP, including by ending the mandatory interview requirement that often results in procedural denials or disenrollment that disproportionately impact college students and working families,<sup>19</sup> along with corresponding changes to quality control measures and fraud investigation procedures to ensure that students and state administrators are not held liable for incorrect eligibility determinations and inadvertent overpayment errors. In addition, FNS should issue guidance to state agencies reminding them of current flexibilities for conducting interviews in formats and timeframes that accommodate students' academic and work commitments.
- Issue guidance from FNS reminding states that non-federal financial aid (from state, local, private, and institutional sources) should be excluded from counting as income for SNAP eligibility. Excluding all financial aid from income simplifies the SNAP application process by reducing confusion around which sources of financial aid are countable or non-countable, eliminating the administrative burden on students and colleges to provide documentation of how their financial aid is allocated. In some states, this policy will also align SNAP with the treatment of income under Medicaid and TANF.
- Hold state SNAP agencies accountable for accurately assessing student eligibility and communicating current guidance,<sup>20</sup> to ensure that potentially eligible students are not subject to procedural denials for SNAP due to misunderstandings by regional, state, and county offices.

### **Improved Data and Outreach**

- Enact a long-term Memoranda of Understanding (MOU) between USDA and ED to establish regular and direct outreach to students with low incomes about potential SNAP eligibility, including when they apply for financial aid and at least once more annually. This MOU should also facilitate coordination at the state level between state SNAP agencies and state grant agencies, who may already be conducting outreach on public benefits for students, and with institutions such as community colleges that enroll a disproportionate number of students who are experiencing food insecurity.
- Issue regular guidance and resources from ED and FNS to colleges, state grant agencies, and SNAP agencies, to promote outreach to potentially eligible students about SNAP using FAFSA and state financial aid data. These actions should include conducting regular webinars and conference presentations and posting regular guidance and best practices for colleges on ways to

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<sup>18</sup> Ibid.

<sup>19</sup> Student Defense. (2023, December 11). [Petition by the National Student Legal Defense Network to Eliminate the Interview Requirement for the Supplemental Nutrition Assistance Program.](#)

<sup>20</sup> The Institute for College Access and Success. (2024, August). [New GAO Report Underscores Need for Federal Reform in SNAP](#)

use FAFSA data to enroll students in public benefits.<sup>21</sup> Currently, most states and institutions of higher education are not yet using data already at their fingertips to connect students with benefits, and they could benefit from regular technical assistance on how to do so.<sup>22</sup>

- Encourage state SNAP agencies and state governing, policy, and coordinating boards of postsecondary education to collect and report institution-by-institution and demographic data on students who are potentially eligible for SNAP, who applies, and who is approved for the program. Today, only minimal SNAP enrollment data is available for college students, including in California<sup>23</sup> and Virginia,<sup>24</sup> and data is collected but not publicly available in Kentucky. Better SNAP data (including data disaggregated by race and ethnicity, sex and gender, level of enrollment, institution sector, and the student exemptions used) will inform outreach efforts among institutions, state agencies, and direct service organizations. USDA should also explore the possibility of establishing a student identifier for state reporting requirements to enable analysis of which are having the greatest difficulties enrolling in SNAP.

### **Improved Guidance and Resources to Reduce Campus Food Insecurity**

- Issue joint guidance, recommendations, and support from ED and FNS for colleges to expand the availability of free or affordable food options on-campus beyond food pantries, including how to create on-campus stores that can accept SNAP benefits for groceries<sup>25</sup> and on-campus dining facilities that can provide hot meals to students experiencing homelessness and students with disabilities under the Restaurant Meal Program, and expand partnerships that allow college hunger initiatives to benefit from tax incentives and federal liability protections.<sup>26</sup>
- Fully implement the *FAFSA Simplification Act* by issuing interim guidance, and announcing forthcoming rulemaking, from ED on “cost of attendance” rules to ensure students receive a fair and honest accounting of their actual need for nutritious food and allow students to receive enough financial aid to cover the cost of three healthy meals a day.<sup>27</sup>

We also urge the Biden-Harris Administration to work with Congress to overhaul the complex SNAP student rules in the Farm Bill; these rules undermine the ability of students to gain additional skills and enter the workforce and make it harder for people with low incomes to get the training they need to improve their wages and financial security. Simplifying the SNAP eligibility rules, reducing administrative burdens and unnecessary bureaucracy, and facilitating awareness and enrollment, will help

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<sup>21</sup> U.S. Department of Education. (2024, July 29). [\*\(GENERAL-24-93\) Guidance on Means-Tested Benefits Outreach for Institutions and State Grant Agencies\*](#) U.S. Department of Education. (2022, January 20). [\*Dear Colleague GEN-22-02: Use of FAFSA Data to Administer Federal Programs\*](#).

<sup>22</sup> Higher Learning Advocates, National Association of Student Financial Aid Administrators. (2024, January 25). [\*The Numbers Speak for Themselves: Using FAFSA Data to Secure Today's Students' Basic Needs\*](#).

<sup>23</sup> California Policy Lab. (2022, February 23). [\*California Community College and University of California student participation in CalFresh food benefits\*](#).

<sup>24</sup> State Council of Higher Education for Virginia. [\*Undergraduate fall enrollment, SNAP participation and potential eligibility\*](#).

<sup>25</sup> Gilkesson, P. (2021). [\*Frequently Asked Questions About SNAP and Students\*](#). Center for Law and Social Policy; New, J. (2016, January 29). [\*Joining U.S. hunger program is not a snap\*](#). Inside Higher Ed.

<sup>26</sup> Congressional Research Service (2021, June 9). [\*Food Insecurity Among College Students: Background and Policy Options\*](#).

<sup>27</sup> The Hope Center for Student Basic Needs at Temple University. (2023, April 25). [\*Re: Docket ID ED-2023-OPE-0039, Intent to Establish Negotiated Rulemaking Committee. Coalition Letter to the U.S. Department of Education on Cost of Attendance\*](#).

this Administration achieve its stated goals of increasing postsecondary attainment, reducing hunger,<sup>28</sup> advancing racial equity,<sup>29</sup> and improving the delivery of government services.<sup>30</sup>

Again, we thank the Biden-Harris Administration for its commitment to ending hunger in America and for the actions it has already taken to support students in higher education in meeting their basic needs. Streamlining access to SNAP and reducing barriers for students is a sound investment that will improve the American workforce and build economic resiliency for millions of families. Thank you for considering these requests, and we look forward to partnering with you on these critical efforts.

Sincerely,

**National Organizations**

The Hope Center for Student Basic Needs  
Association of Community College Trustees  
Jobs for the Future  
The Institute for College Access and Success  
American Association of Community Colleges  
American Council on Education (ACE)  
Alliance for a Just Society  
American Association of State Colleges and Universities (AASCU)  
APIA Scholars  
Believe in Students  
Campus Compact  
Center for Higher Education Policy and Practice at SNHU  
Center for Science in the Public Interest  
EdTrust  
Food Recovery Network  
Food Research and Action Center  
Generation Hope  
Hildreth Institute  
Institute for Higher Education Policy (IHEP)  
MAZON: A Jewish Response to Hunger  
NASPA - Student Affairs Administrators in Higher Education  
National Association of Independent Colleges and Universities  
National Association of State Student Grant and Aid Programs (NASSGAP)  
National College Attainment Network (NCAN)  
National Education Association  
New America Higher Education Policy Program  
SchoolHouse Connection

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<sup>28</sup> *Supra*, See Note 1.

<sup>29</sup> The White House. (2021, January 20). [\*Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.\*](#)

<sup>30</sup> The White House. (2021, December 13). [\*Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government.\*](#)

State Higher Education Executive Officers Association  
Student Basic Needs Coalition  
Student Defense  
Swipe Out Hunger  
Today's Students Coalition  
uAspire  
Young Invincibles

**Regional, State & Local Organizations, and Institutions of Higher Education**

Alchemist Community Development Corporation  
ATCAA Food Bank Tuolumne  
Bunker Hill Community College  
California Association of Food Banks  
California Competes: Higher Education for a Strong Economy  
California Student Aid Commission  
Cedar Crest College  
Center for Healthy Communities  
Changing Perspectives  
City Colleges of Chicago  
Coalition of California Welfare Rights Organizations  
Communities for Our Colleges  
Community Action Partnership of San Bernardino County  
Community Food Bank of San Benito County  
Doing Good Works  
EduOptimists LLC  
Feeding New York State  
Feeding Pennsylvania  
Feeding Texas  
FIND Food Bank  
Food Bank of Contra Costa and Solano  
Food Bank of Western Massachusetts  
Food for People  
Food Share of Ventura County  
Foster Greatness  
GRACE/End Child Poverty California  
Greater Chicago Food Depository  
Hunger Free Colorado  
Hunger Free Vermont  
Hunger-Free Pennsylvania  
Illinois Hunger Coalition  
John Burton Advocates for Youth  
Just Harvest (Pennsylvania)  
Latino Community Fund of Washington State

LeadMN - College Students Connecting for Change  
MA Hunger Free Campus Coalition  
Massachusetts Law Reform Institute  
Michigan Community College Association  
New Mexico Basic Needs Consortium  
North Hennepin Community College  
North Star Prosperity  
Northwest Harvest  
Nossi College of Art & Design  
Nourish California  
Nourish Colorado  
Ohio Association of Foodbanks  
One Family  
Orange County Food Bank  
Partners for a Hunger-Free Oregon  
Partners for Campus-Community Engagement  
Portland Community College  
River City Food Bank  
San Bernardino Community College District  
Second Harvest Food Bank of Orange County (CA)  
Second Harvest Heartland (MN)  
Second Harvest of Silicon Valley  
SF-Marin Food Bank  
The Farmlink Project  
The Greater Boston Food Bank  
The Los Angeles Regional Food Bank  
The Open Door  
United Way of King County  
University District Food Bank  
University of California Agriculture and Natural Resources  
University of California System  
University of California, Irvine  
University of California, Los Angeles  
University of California, San Diego  
University of California, Santa Barbara  
University of California, Santa Cruz  
University of Oregon  
University of Washington  
University of Washington Food Pantry  
Vermont Foodbank  
Washington Anti-Hunger & Nutrition Coalition  
Washington Student Achievement Council  
Western Center on Law and Poverty  
William E. Morris Institute for Justice



