

October 18, 2022

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 85 undersigned organizations representing a diverse coalition of advocates, students, institutions of higher education, associations, research organizations, and service providers that work to combat college student hunger, we write to request bold action from the Biden-Harris Administration to eliminate systemic barriers to food security in higher education. When students can meet their basic needs, they are more likely to be able to care for their families, focus on their coursework, finish their degrees and credentials, and actively support and participate in their communities.

We applaud the Biden-Harris Administration and Congress for hosting and funding the first White House Conference on Hunger in more than 50 years and for including college students in the National Strategy on Hunger, Nutrition, and Health (“Strategy”).<sup>1</sup> In particular, we appreciate the Strategy’s acknowledgment that food insecurity is a persistent issue in higher education and that restrictions on college students’ participation in the Supplemental Nutrition Assistance Program (SNAP) are “out of date.” Policymakers created harmful limitations on students’ participation in SNAP more than 50 years ago when the population of students, costs of living, financial returns on higher education, economic and political context, and the burden of student debt were all fundamentally different. We also applaud the Administration’s commitment to interagency outreach to enroll more eligible college students in SNAP.

The Strategy and Conference represent a positive step in identifying policy issues related to student food insecurity. We also believe there are timely, impactful, and evidence-based actions that your agencies can take, working together, to build on the Strategy’s recommendations to address the crisis of college hunger in America.

Today, one in three college students report experiencing food insecurity and hunger, with disproportionately higher levels of food insecurity among students with intersectional identities such as Black, Native, and Indigenous students, first-generation students, Pell Grant recipients, parenting students, and LGBTQ+ students.<sup>2</sup> Additionally, the Government Accountability Office found that 57% of students who are likely food insecure and income-eligible for SNAP do not receive benefits.<sup>3</sup> We must do more to connect students to essential resources to prevent them from experiencing food insecurity.

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<sup>1</sup> The White House. (2022, September 27). [Biden-Harris Administration National Strategy on Hunger, Nutrition, and Health](#).

<sup>2</sup> The Hope Center for College, Community, and Justice. (2021, March) [#RealCollege 2021: Basic needs security during the ongoing pandemic](#).

<sup>3</sup> Government Accountability Office. (2019, January 9). [Food insecurity: Better information could help eligible college students access federal food assistance benefits](#).

Therefore, we call for bold action from the Biden-Harris Administration to improve access to SNAP for college students as a critical element of the Strategy’s plan to end hunger by 2030.

### **Working with Congress**

Specifically, the Administration should build on the Strategy by committing to work with Congress to:

- End the out-of-date SNAP work requirement for college students during the upcoming farm bill reauthorization. No student attending college at least half-time should also have to work 20 hours per week to afford enough to eat. The work requirement is an eligibility barrier that forces students with low incomes to turn their attention away from their coursework and puts their ability to complete a degree or credential at risk. The Administration should propose permanently ending SNAP work requirements for college students in its FY 2024 budget proposal;
- Maintain pandemic-era SNAP flexibilities alongside existing exemptions for students until Congress can reauthorize the farm bill. These include but are not limited to sustaining exemptions to the work requirement for students with a \$0 Expected Family Contribution or who are eligible for federal or state work study, as well as removing the mandatory interview requirement that has caused many eligible students to go hungry while they balance numerous academic, work, and family obligations. The Administration should request Congress extend these flexibilities as part of the FY 2023 appropriations process or another must-pass vehicle;
- Make federal emergency aid grant funding permanent. Of the students who received nearly \$40 billion in federal emergency aid grants during the pandemic, more than three in five say they used these funds to purchase food.<sup>4</sup> Congress should help maintain this critical source of support for students by continuing the flexibilities for and investing in Supplemental Educational Opportunity Grants and exempting all emergency grants from estimated financial aid and other Title IV limitations. The Administration should work to advance these priorities as part of the FY 2023 appropriations process or another must-pass vehicle; and
- Allow additional flexibility for students to use SNAP benefits for prepared foods on campus as part of the Strategy’s goal to provide “free healthy school meals for all.” Additionally, the Administration should propose to expand the National School Lunch Program to higher education, particularly to colleges that serve large numbers of students with low incomes. The Administration should pursue these reforms during the reauthorization of the farm bill and include the proposals in the President’s FY 2024 budget proposal.

### **Administrative Action**

Additionally, your agencies should build on the Strategy by taking the following administrative actions as soon as possible:

- Prepare a “whole-of-government” approach for the wind-down of the public health emergency period that has provided essential SNAP flexibilities for students if Congress fails to extend the current flexibilities until the farm bill is reauthorized. We have reviewed recent guidance from

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<sup>4</sup> NASFAA, NASPA, and HCM Strategists. (2022, September 30). [Evaluating student and institutional experiences with HEERF](#).

USDA's Food and Nutrition Service (FNS) encouraging states not to disenroll students from SNAP after the end of the public health emergency without affirmatively screening them for eligibility under the traditional student exemptions.<sup>5</sup> To ensure this guidance is followed, FNS should require states to submit plans to their regional offices for how they will screen students' for their potential eligibility under the student exemptions and ensure students are not incorrectly classified under rules for "able-bodied adults without dependents." Federal agencies should also conduct a broad outreach campaign about the transition period and provide customized materials for federal, state, and county social services, institutions of higher education, and students.

- Issue guidance from FNS clarifying that many students with low incomes, including (a) students approved for federal or state work study, regardless of whether a position has been secured or funded, (b) students enrolled in community college and other career-focused programs that result in high employability, and (c) students with disabilities (including learning disabilities who may receive accommodations or take longer to graduate), are not required to satisfy any work requirements to access SNAP benefits if they otherwise meet income requirements. This guidance should cover undergraduate, graduate, and professional students. Many states and colleges have not made widespread use of these exemptions.
- Issue guidance reminding states of the option to exclude non-federal financial aid (from state, local, private, and institutional sources) 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.
- Issue guidance, recommendations, and support 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>6</sup> and on-campus dining facilities that can provide hot meals to students experiencing homelessness and students with disabilities under the Restaurant Meal Program.
- Implement the *FAFSA Simplification Act* by issuing interim guidance, and announcing forthcoming rulemaking, on "cost of attendance" rules to ensure students receive a fair and honest accounting of their actual need for nutritious food, prevent colleges from undercounting the level of need students face, and allow students to receive enough financial aid to cover the cost of three healthy meals a day.
- Codify the Memorandum Understanding (MOU) mentioned in the Strategy into regulation and ensure it contains provisions that require regular notifications to students of their eligibility for SNAP when they apply for financial aid. Further, the Administration should pursue and codify MOUs with other federal agencies to notify students regularly about other public and tax benefits like WIC, TANF, Medicaid and ACA coverage, the Earned Income Tax Credit, and Child Tax Credit that collectively help to improve food insecurity and expand students' financial support.

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<sup>5</sup> USDA Food and Nutrition Service. (2022, October 12). [End of temporary student exemptions in the Consolidated Appropriations Act, 2021](#).

<sup>6</sup> New, J. (2016, January 29). [Joining U.S. hunger program is not a snap](#). Inside Higher Ed.

These MOUs should facilitate data transparency to allow states and colleges to track applicants and enrollees to inform their outreach and case management efforts.

- Work with colleges and state SNAP agencies to promote the use of FAFSA data-sharing to identify eligible students and help them enroll, including conducting regular webinars and conference presentations and posting best practices and guidance for colleges on ways to use FAFSA data to enroll students in public benefits.<sup>7</sup>
- Improve and expand agency communications, websites, webinars, and other resources to emphasize pathways for college students to gain access to SNAP. Agency resources and information on college students must include clear guidance for colleges and students on how to apply for benefits, how to contact state SNAP agencies in the event there are eligibility or enrollment questions, and best practices for enrolling students and addressing college hunger.
- Work with state SNAP agencies on a coordinated outreach campaign to students and families, especially in states where there has been little outreach or information on SNAP exemptions and flexibilities.<sup>8</sup> Outreach should be customized and informed by other examples of public benefits enrollment to target students who are likely eligible for SNAP; and
- Require state SNAP agencies to post disaggregated data on the enrollment of college students in SNAP. Today, only minimal enrollment data is available for college students, including students in California<sup>9</sup> and Virginia.<sup>10</sup> Better SNAP data (including data disaggregated by race and ethnicity, sex and gender, level of enrollment, institution, and exemption category) will inform benchmarks for outreach and lift effective practices.

We are grateful, committed, and energized to reduce and eliminate student food insecurity. Higher education has an essential role to play in ending hunger in America. The better we care for our students, the better they will be able to serve, learn, and work in their communities. Thank you for considering these requests, and we look forward to partnering with you on these critical efforts.

Sincerely,

The Hope Center for College, Community, and Justice  
2-1-1 Humboldt Information and Resource Center  
Alameda County Community Food Bank  
Alchemist CDC  
Area 1 Agency on Aging  
Association of Community College Trustees (ACCT)  
Binghamton University

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<sup>7</sup> U.S. Department of Education. (2022, January 20). [\*Dear Colleague GEN-22-02: Use of FAFSA Data to Administer Federal Programs.\*](#)

<sup>8</sup> Hillard, T. & Hobbs, D. (2021). [\*Best kept secrets: The federal government expanded SNAP eligibility for college students, but many never heard about it.\*](#) The Hope Center for College, Community, and Justice.

<sup>9</sup> California Policy Lab. (2022, February 23). [\*California Community College and University of California student participation in CalFresh food benefits.\*](#)

<sup>10</sup> State Council of Higher Education for Virginia. [\*Undergraduate fall enrollment, SNAP participation and potential eligibility.\*](#)

California Association of Food Banks  
California Community Colleges  
California State Student Association  
Campus Compact  
CAP OC/OC Food Bank  
Carnegie Mellon University  
Center For Healthy Communities  
Center for Law and Social Policy  
Community Action Agency of Butte County, Inc.  
Community Food Bank of San Benito County  
Community Legal Services of Philadelphia  
Feeding New York State  
Feeding San Diego  
Feeding Texas  
FIND Food Bank  
Florida Impact  
Florida Policy Institute  
Food Bank Coalition of San Luis Obispo County  
Food Bank of Contra Costa and Solano  
Food Bank of the Southern Tier  
Food for People  
Food Research & Action Center (FRAC)  
Food Share Ventura County  
GRACE/End Child Poverty California  
Greater Philadelphia Coalition. Against Hunger  
Hunger Free America  
Hunger Free Colorado  
Hunger Free New Jersey  
Hunger Free Vermont  
Hunger Solutions Minnesota  
Hunger Solutions New York  
Illinois Hunger Coalition  
Just Harvest  
Los Angeles Regional Food Bank  
Massachusetts Law Reform Institute  
North Coast Growers' Association  
Northeast Organic Farming Association of Vermont  
Nourish California  
Nourish Colorado  
Nutrition Policy Institute, University of California Agriculture and Natural Resources  
Ohio Association of Foodbanks  
One Family  
Open Door Community Health Centers  
Redwood Empire Food Bank

S.A.C.R.Ed Eco-Center  
Sacramento Food Bank & Family Services  
San Diego Hunger Coalition  
San Francisco-Marin Food Bank  
SC Appleseed Legal Justice Center  
Second Harvest Food Bank of Orange County (CA)  
Second Harvest Food Bank Santa Cruz County  
Second Harvest of Silicon Valley  
Second Harvest of the Greater Valley  
SUNY  
Swipe Out Hunger  
The California State Student Association  
The California State University  
The Center for Community Solutions  
The Education Trust  
The Food Bank of Western Massachusetts  
The Greater Boston Food Bank  
The Grub Hub - Fort Lewis College  
The Open Door  
The Vermont Foodbank  
uAspire  
United Way of King County  
University at Albany, State University of New York  
University of California Agriculture and Natural Resources  
University of California Riverside  
University of California Student Association  
University of California System  
University of California, Graduate and Professional Council  
University of California, Riverside  
URI Feinstein Center for a Hunger Free America  
Utahns Against Hunger  
Washington Anti-Hunger & Nutrition Coalition  
William E. Morris Institute for Justice  
Worcester County Food Bank

CC: Ms. Stacy Dean, Deputy Under Secretary, Food and Nutrition Service  
The Honorable James Kvaal, Under Secretary of Education  
Ambassador Susan Rice, Director, White House Domestic Policy Council