



OFFICE OF THE PRESIDENT
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July 15, 2022

Re: Working Group on College Student Hunger Policy Priorities for the White House Conference on Food, Nutrition, Hunger, and Health

The Honorable Joseph R. Biden Jr.
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear President Biden:

College student hunger is a growing crisis. Nationally, [one in three](#) of today's college students report experiencing food insecurity, and yet too often, state and federal policymakers have made it difficult or impossible for students to access resources and support to help them meet their basic needs, including food. In September 2021, our working group of leading voices on college student hunger [shared research and testimony at the first ever congressional hearing on the topic](#). We believe the 2022 White House Conference on Food, Nutrition, Hunger, and Health is a crucial opportunity to continue a conversation that prioritizes the needs of college students who are underrepresented in national public health efforts, and leads to the development of a bold plan that endeavors to end hunger, not just make it more tolerable for those who experience it. Furthermore, it is an opportunity for the Administration to prioritize human dignity. The signatories on this letter are using the following principles in guiding our recommendations. We believe that the Administration should seek to reduce hunger by supporting policies which:

- Are informed by people with low incomes who are given the opportunity to participate in the policy making process;
- Prioritize social determinants of health to reduce poverty and inequality;
- Center communities with inequitable rates of challenges by making intersectional (race, class, gender, ability, etc.) equity a priority in the shaping of and confirming the recommendations that will determine funding, policies, and solutions; and
- Take a whole-of-government approach, inclusive of all federal agencies that oversee programs related to basic needs.

The plan to end hunger in the United States must include a strong focus on addressing the hunger crisis, homelessness, and other basic needs among college students. The Biden-Harris Administration must recognize the diversity of today's college students and the key roles they

play in physically and economically supporting their dependents, loved ones, and communities in their day-to-day lives.

We congratulate Chairman McGovern and the Administration for securing \$2.5 million to fund the Conference. Our community is eager to support the planning, hosting, and realization of the policies presented during our hearing.

With these principles guiding our policies, we have developed a list of recommendations that the Biden-Harris Administration and federal stakeholders can enact to make the most meaningful contributions toward ending hunger. These recommendations focus on higher education, given that educational attainment in postsecondary education is a significant social determinant of health. Our key recommendations are the following:

1. Federal Nutrition Programs

1a. Through Executive Action

- Name and support codifying “college students (undergraduate and graduate students)” as a priority population for public programs along with children, single parents, disabled people, veterans, and seniors. College students are overwhelmingly excluded from public programs and experience “othering” because they are not explicitly named as an eligible or priority population currently.
- Maximize college students’ Supplemental Nutrition Assistance Program (SNAP) access under existing law to mitigate any loss of SNAP after the current public health emergency ends, and while Congress works to eliminate the punitive work for food requirements.
 - [The U.S. Department of Agriculture \(USDA\) should issue guidance](#) to states that clarifies that low-income students can receive current SNAP exemptions if approved for work study as part of their financial aid package, including if they are enrolled in any state or local educational programs that improve their employability. The Administration should clarify that the “mental or physical unfitness” exemption includes being homeless, receiving disability or special needs accommodations through their colleges, and/or placed in college through their state’s Vocational Rehabilitation and Employment program or meeting or other conditions. USDA has both the authority and obligation to remove barriers to access and equity under the existing rules.
- Authorize USDA to exclude as countable income for SNAP and other means-tested programs any state or institutional financial aid as well as the part-time income or stipends of full-time students, as is the case for earnings of high school students under age 18 participating in SNAP.
- Broaden USDA “[SNAP Outreach](#)” to conduct targeted outreach, including through social media, that will increase college student participation in SNAP.
- Establish a higher education subcontract in each state to conduct “[SNAP Outreach](#)” and enrollment support for college campuses across the country. USDA would provide

guidance for identifying and assigning a higher education subcontractor to support outreach with primary state leads.

- Support nutrition by increasing access, availability, and consumption of nutritious foods to emerging adults, including college students, among whom fruit and vegetable intake is low.
- Establish an intra-agency agreement to automatically enroll higher education students who were eligible for the National School Lunch Program in SNAP.
- Create inter-agency commitments to align research funding opportunities (e.g., collaborative RFPs between NIFA and NIH) to improve nutrition (e.g., healthy eating, access to first-generation nontraditional food and farming producers), well-being, and academic outcomes for students in higher education.
- Prepare an annual publication/briefing from the U.S. Department of Education and USDA that provides updated examples of schools proactively using Free Application for Federal Student Aid (FAFSA) data to guide and conduct SNAP outreach, free & reduced-price school lunch, Special Supplemental Nutrition Program for Women, Infants and Children (WIC), and other benefits.
- Allow categorical eligibility for enrollment in Head Start centers for children of students who are Pell-eligible. This is already allowed for those receiving SNAP or Temporary Assistance for Needy Families (TANF).
- Allow WIC enrollment to students (pregnant, postpartum or with a child 1-4 years old) who are Pell-eligible.
- Direct the U.S. Department of Education to conduct rulemaking on college Cost of Attendance for students by 2023-2024. (i) Rulemaking should set minimum standards for quality nutrition and methodologies that provide for the equivalent of three nutritious meals per day for students. (ii) Regional cost differences must be considered when establishing the cost of meals that get factored into financial aid packaging. (iii) There must be proactive alignment across financial aid packaging and eligibility for social services in order to provide the best resources for students to have healthy, successful, and thriving experiences into, through, and beyond college.

1b. Through Legislative Action

- Permanently end the (i) *work for food rule* and (ii) *college student work requirement* to expand SNAP access to low-income college students. Prevent a food cliff for students who currently receive SNAP benefits through the temporary expansions made in the Coronavirus Response and Relief Supplemental Appropriations Act of 2021. The pandemic waiver [proved effective as thousands of students](#) enrolled in SNAP.
- Pass and enact the EATS Act of 2021 (H.R. 1919 / S. 2515) to include the pursuit of postsecondary credentials to meet compliance, work participation, and/or core activity requirements for public benefit programs.
- Pass and enact the Student Food Security Act of 2021 (H.R. 5591 / S. 1569).

- Pass and enact the Food for Thought Act of 2022 (H.R. 6934) that would create a pilot within the National School Lunch Program to allow community colleges to serve free meals to students.
- Support legislation that would allow student loan payments to be counted as a household income deduction, as is the case for expenses related to shelter, dependent care, and other basic needs.
- Pass and enact the BASIC Act of 2021 (S. 2004/H.R.3857).

2. Federal Financial Aid and Housing Programs as Related to Nutrition in Higher Education

2a. Through Executive Action

- Direct the U.S. Department of Education to ensure full execution of the FAFSA Simplification Act and ensure colleges' estimates of the total cost of attendance are reasonable, employing a minimum standard of quality in their methodology, while considering regional differences in the cost of living across the country.
- Direct the U.S. Department of Education to conduct continuous outreach to identify and inform students who fill out a FAFSA form of their eligibility for federal assistance programs such as SNAP, Head Start, HUD rental assistance, WIC, TANF, and with the USDA/FNS on how to pursue enrollment in these programs.
- Reform inequitable Satisfactory Academic Progress (SAP) policies to reflect student food insecurity and the fact that many students drop out of taking fewer classes due to experiencing hunger or other basic needs insecurity.
 - Establish more flexibility for students to appeal loss of financial aid due to SAP based on extenuating circumstances like food insecurity (in addition to homelessness) and ensure that students who leave college can have their financial aid eligibility restored no later than two years after leaving.
- Ensure that the U.S. Department of Transportation is engaged in the conversation surrounding student nutrition and well-being as it is allocated billions of infrastructure dollars. They must ensure that students, colleges, and universities are at the table when counties are deciding on community infrastructure investments (for example, improving food access and pathways to affordable food outlets in the built environment).
- Direct the U.S. Department of Housing and Urban Development to issue guidance to housing authorities to allow for categorical eligibility for Section 8 Choice Housing Vouchers if students are Pell-eligible and require housing authorities to have a certain number of vouchers set aside for college students, with prioritization around students with dependents. This is something that Moving to Work Housing Authorities already have the authority to do.

2b. Through Legislative Action

- Pass and enact legislation to double the maximum Pell Grant, so that grants once again reflect increasing college prices and the true cost of living. Students can use these grants to address multiple forms of basic needs insecurity, including food insecurity and hunger.
- Pass and enact legislation, such as the Emergency Grant Aid for College Students Act, to create a permanent emergency aid program modeled after the Higher Education Emergency Relief Fund, which would allow students experiencing hunger and other basic needs insecurity to apply for grants to meet their needs and stay enrolled.

In summary, by increasing access to healthy and sufficient food among college students through public programs, such as SNAP, we expect better outcomes in terms of mental and physical health as well as academic. We also anticipate that when students are nourished, they are better able to learn; therefore, we anticipate impacts on college retention and completion. Additionally, students who are sufficiently nourished may obtain adequate nighttime sleep in addition to having more energy to be physically active, thereby reducing risk for cardiometabolic disease. Furthermore, educational attainment is one of the largest predictors of Alzheimer disease and related dementia, and therefore, by ensuring that college students have the nutrition to succeed is instrumental. Emerging adults, especially college students, have long been underrepresented in health research and federal programs; however, it is time for national investment and prioritization of this population in order to see an improvement in the Nation's health. Our higher education community is energized to support the transformative progress that will be accomplished as a result of the implementation of strategies established at the 2022 White House Conference on Food, Nutrition, Hunger, and Health.

Thank you for your commitment to higher education and consideration of these priorities.

If you have any questions regarding these comments, please contact Chris Harrington, associate vice president for federal governmental relations, at Chris.Harrington@ucdc.edu or 202-997-3150.

Sincerely,



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cc: Shawn Brick, Executive Director of Student Financial Support, University of California System
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