March 9, 2023

The Honorable Dianne Feinstein
U.S. Senate
Hart Senate Office Building, Room 331
120 Constitution Avenue, NE
Washington, D.C. 20002

Subject: AICCU Comments on 2023 Farm Bill Reauthorization – SNAP Benefits for Postsecondary Students

Dear Senator Feinstein:

The Association of Independent California Colleges and Universities (AICCU) respectfully requests that, via the Farm Bill, the Senate eliminates the barriers to access to the Supplemental Nutrition Assistance Program (SNAP) for low-income college and university students. Doing so will increase access to basic needs assistance for struggling students and, consequently, help them persist and graduate. Coupled with doubling the Pell Grant, these two programs together can minimize the challenges facing today’s students: food insecurity and other basic needs, college affordability and student debt, and equitable access to higher education opportunities.

AICCU is the organizational voice for over 80 nonprofit colleges and universities in California. Together, the sector educates nearly 189,000 undergraduate students, over 43,000 of whom are Pell Grant recipients. In California, research has shown that one in three students are food insecure.\(^1\) Additionally, recent research shows that increased access to SNAP/CalFresh, through waivers and expanded eligibility during the pandemic declaration, helped student recipients attending the University of California maintain their GPA, compared to those that did not receive the benefits.\(^2\)

As Congress begins the process of reauthorizing the Farm Bill, and with the pandemic declaration being lifted in the coming months, AICCU recommends the following:

- Eliminate the student eligibility rules so income-eligible students can apply like any other applicant. Doing so would remove a series of extra steps that only students need to complete and would increase access to nutrition benefits for high-need postsecondary students.

- Verify SNAP recertification for student through the annual FAFSA submission and eliminate the six-month eligibility status check. Students’ financial circumstances do not change considerably while attending a higher education institution. Waiving the six-month eligibility recertification requirement and, instead, using information collected in the FAFSA would eliminate unnecessary reporting burdens on students.

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2 \(^2\) https://www.mdpi.com/2072-6643/15/4/898
• Provide presumptive eligibility for students who are $0 Expected Family Contribution (EFC). This includes recipients of the maximum Pell Grant under the new Student Aid Index. A student’s FAFSA application provides critical information that would not need to be provided again through the SNAP (or state food benefits) application.

Under the current emergency federal COVID-19 provisions, the United States Department of Agriculture (USDA) allowed FAFSA filers who meet the $0 EFC threshold to apply for benefits without meeting other student eligibility requirements. This eliminated significant burdens on students and created greater access. We encourage lawmakers to make this change permanent.

• Eliminate the interview requirement. Eliminating this requirement will expedite the application process and establish a more efficient one for determining student eligibility. Doing so will also reduce a significant and unnecessary burden for students, who would have conflicts with classes and possibly work schedules.

During the federal emergency COVID-19 declaration, USDA waived the interview requirement. We encourage lawmakers to make this waiver permanent.

As the COVID-19 pandemic emergency declaration comes to an end in the coming months, thousands of students that were able to access SNAP benefits during this period will face a “hunger cliff” as the barriers return when the pathways to eligibility no longer exist. As Congress considers its reauthorization of the Farm Bill, we should use this as an opportunity to address the historic barriers that have excluded postsecondary students from the program, despite the changing nature of the student population.

Sincerely,

Kristen F. Soares
President