



# higher learning

## ADVOCATES

Program Design Branch  
Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Dr.  
Alexandria, VA 22302.

To Whom It May Concern:

On behalf of Higher Learning Advocates, a bipartisan nonprofit organization that advances policy changes to support a system of higher learning that is student-centered, equitable, outcomes-based, and focused on educational quality, I am writing to comment on Notice of Proposed Rulemaking (NPRM), the “Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)”, Docket ID Number FNS-2018-0037.

A key principle of the Supplemental Nutrition Assistance Program (SNAP) is ensuring that every family in every community has access to healthy and affordable food, and SNAP plays a critical role in addressing hunger and food insecurity in communities across the country. Each month, approximately 38 million participants—two-thirds of whom are children, older adults, and people with disabilities—rely on SNAP’s temporary but crucial help to put food on the table.

Food insecurity is a growing and serious problem for today’s postsecondary students. Estimates show about one-third of college students experience some form of food insecurity. Further, while 18 percent of college students qualify for SNAP benefits, only three percent of students actually receive such benefits. With the pressing cost of tuition, work, and family responsibilities that today’s increasingly diverse college students experience, the inability to maintain access to nutritious meals are avoidable obstacles that should not get in the way of students’ postsecondary success. Instead of making it harder for students to access SNAP, we should encourage and support ways in which colleges can help more low-income students to understand if they are eligible for food assistance.

The proposed regulation seeks to narrow what Temporary Assistance for Needy Families (TANF) benefits would qualify as extending categorical eligibility for SNAP. Specifically, the NPRM would end the establishment of categorical eligibility for SNAP through cash benefits that are not ongoing and the provision of certain non-cash benefits. The NPRM takes this stance despite rightly pointing out that states have utilized statutory flexibility provided to them under

TANF to provide both cash and non-cash benefits to TANF recipients to respond to the individual needs of families. In addition, the regulatory impact analysis section of the NPRM also raises the likelihood of the rule change having a negative impact on “food security” and that it would “reduce the savings rates among those individuals”.

Higher Learning Advocates opposes this proposed rule as it would terminate SNAP eligibility for more than 3 million individuals, many of whom are likely to be seeking a postsecondary education to ensure their ability to work and earn. The Higher Education Act relies on SNAP eligibility, as one of several means tested programs, to establish what is called “automatic zero expected family contribution” (Auto Zero). Individuals who receive SNAP benefits can qualify for an Auto Zero determination and receive the maximum Pell Grant amount to assist with postsecondary tuition and related expenses. This important trigger for Pell Grant eligibility ensures individuals aren’t deterred in their postsecondary education by the byzantine financial aid forms used to qualify for federal student aid.

In closing, we urge the Food and Nutrition Service (FNS) to reconsider moving forward with the proposed rule. Thank you for the opportunity to comment on this NPRM.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie Peller', with a long horizontal flourish extending to the right.

Julie Peller

Executive Director

