Journal of Food Law & Policy

Volume 14 | Number 1 Article 13

2018

The End of the Ramen Diet:Higher Education Students and SNAP Benefits

Erika M. Dunyak

Journal of
FOOD & LAW
POLICY

Volume Fourteen Number One

Spring 2018

The End of the Ramen Diet: Higher Education Students and SNAP Benefits

Erika M. Dunyak

A Publication of the University of Arkansas School of Law

The End of the Ramen Diet: Higher Education Students and SNAP Benefits

Erika M. Dunyak*

Introduction

Americans joke that college students have so little money that they subsist on ten-cent packs of ramen. Unfortunately, the current reality of nutrition on campus is no joking matter. Statistically, college students face much higher rates of food insecurity than the general population and the situation is particularly dire for students of color.[1] This article will look to a solution for this hungry, and often neglected, population.

In a statement to Congress encouraging "Great Society" legislation, President Lyndon Johnson said, "Higher education is no longer a luxury, but a necessity."[2] The average graduate with a Bachelor's degree will earn double what the average individual without a degree will make in his or her lifetime.[3] By federally supporting students during this period, they will likely have greater financial self-sufficiency later in life.

Hunger advocates have focused especially on children, through the National School Lunch Program (NSLP);[4] the

---

* Erika Dunyak is a graduate of Case Western Reserve University School of Law and the Agricultural and Food Law LL.M. at the University of Arkansas. The author would like to express her gratitude to Jessica Friedman for her tireless support and encouragement.

[1] *See* Sara Goldrick-Rab et al., Wisconsin Hope Lab, Still Hungry and Homeless in College 17 (2018), http://wihopelab.com/publications/Wisconsin-HOPE-Lab-Still-Hungry-and-Homeless.pdf.

[2] Lyndon B. Johnson, *Special Message to Congress: "Toward Full Educational Opportunity," The American Presidency Project* (Jan. 12, 1965), http://www.presidency.ucsb.edu/ws/?pid=27448.

[3] Brad Hershbein & Melissa Kearney, The Hamilton Project, Major Decisions: What Graduates Earn Over their Lifetimes 5 (2014), https://www.financialbuildingblocks.com/assets/What%20Graduates%20Earn%20Over%20Their%20Lifetimes.pdf.

[4] *National School Lunch Program*, Food Research & Action Center (Feb.

working poor, though the Supplemental Nutrition Assistance Program (SNAP);[5] and the elderly, though Meals on Wheels and SNAP.[6] However, all of these programs exclude actively enrolled college students.[7] Those students have outgrown NSLP and are excluded from SNAP.[8] A two-prong solution would require striking the exclusion of college students from SNAP and, further, actively enrolling college students who are financially supported by federal income-based university programs.

In 2010, the Healthy, Hunger-Free Kids Act (HHFKA) reauthorized the NSLP.[9] HHFKA contained several innovations in the NSLP; one that is particularly relevant is expansion of the "identified students" provision.[10] Under this scheme, students whose families already receive SNAP benefits also qualify for free or reduced-price school meals without a separate application.[11] With the next iteration of the Farm Bill, SNAP should be adjusted to similarly accommodate low-income college students without an additional application. Under this new program, students who qualify for Perkins Loans, Pell Grants, Federal Supplemental Educational Opportunity Grants, and similar federal programs would also receive SNAP benefits without an additional application.

The benefits to such a program would be tremendous. College students are often specifically excluded from receiving benefits such as SNAP and Medicaid. This policy change would move students away from food insecurity, reduce the burden of

---

18, 2018, 9:55 AM), http://frac.org/programs/national-school-lunch-program.

[5] *Supplemental Nutrition Assistance Program*, FOOD RESEARCH & ACTION CENTER (Feb. 18, 2018, 9:55 AM), http://frac.org/programs/supplemental-nutrition-assistance-program-snap.

[6] *Id., Meals on Wheels Facts & Resources*, MEALS ON WHEELS AMERICA (Feb. 18, 2018, 9:55 AM), https://www.mealsonwheelsamerica.org/theissue/facts-resources.

[7] *See National School Lunch Program, supra* note 5; *see also Meals on Wheels Facts & Resources, supra* note 7.

[8] *See National School Lunch Program, supra* note 5.

[9] RANDY ALISON AUSSENBERG, CONG. RESEARCH SERV., TRACKING THE NEXT CHILD NUTRITION REAUTHORIZATION: AN OVERVIEW 3 (2017).

[10] 7 C.F.R. § 245.9(f)(1)(ii) (2016).

[11] *Id.*

schools providing high quality dining experiences that are a major contributor to the cost of higher education, reduce student debt, and bring the political capital of university students to SNAP.

This article will first define the problem of hunger on campuses and provide an overview of the potential economic impacts of food insecurity on college campuses. The second section will describe the proposed Farm Bill-based solution to hunger and food insecurity on campuses. Finally, the third section will explore the possible benefits and difficulties of implementing the program.

This article is limited in its scope and only applies to undergraduate students. Further research must be completed to both understand the degree and effects of hunger for graduate students and research assistants and explore federal policy shifts to address those problems.

I. Background

Like any social policy, hunger policy exists within a complex landscape of moving parts. This section will break down that landscape. First, this section will define the terms "hunger" and "food insecurity" as they are used in this article. The next subsection will examine some of the latest data on hunger and food insecurity on college campuses. Third, this section will describe the economic burden of the college experience, generally, and the cost of providing food to students, specifically. The third subsection will also address the cost of food from the angles of the students, parents, and the schools. Finally, this section will briefly describe the existing legal frameworks that have the greatest effect on hunger in the United States, namely the Supplement Nutrition Assistance Program and the Healthy, Hunger-Free Kids Act.

A. What are Hunger and Food Insecurity?

In 2006, the Committee on National Statics (CNSTAT), at the behest of the U.S. Department of Agriculture (USDA), authored

a report that defined both "hunger" and "food insecurity."[12] The *Food Insecurity and Hunger in the United States* report defines "food insecurity" as "whenever the availability of nutritionally adequate and safe foods or the ability to acquire acceptable foods in socially acceptable ways is limited or uncertain."[13]

The USDA expands its definition to create a range of food security. The USDA contrasts "high food security," defined as "no reported indications of food-access problems or limitations," with "marginal food security," defined as "one or two reported indications—typically of anxiety over food sufficiency or shortage of food in the house [with] little to no indication of changes in diets or food intake."[14] These two categories comprise the USDA definition for "food security."[15]

Similarly, "low food security" and "very low food security" make up "food insecurity."[16] "Low food security" occurs when a household "reports […] reduced quality, variety, or desirability of diet [with] little to no indication of reduced food intake[;]" low food security is sometimes referred to as food insecurity without hunger.[17] "Very low food security" refers to "reports of multiple indications of disrupted eating patterns and reduced food intake" and is sometimes described as food insecurity with hunger.[18]

The CNSTAT report defines hunger as "a potential consequence of food insecurity that, because of prolonged, involuntary lack of food, results in discomfort, illness, weakness, or pain that goes beyond the usual uneasy sensation."[19] Importantly, the report clarifies that hunger and food insecurity

---

[12] COMM. ON NAT'L STATISTICS, DIV. OF BEHAVIOR AND SOC. SCI. AND EDUC., FOOD INSECURITY & HUNGER IN THE UNITED STATES: AN ASSESSMENT OF THE MEASURE 17 (Gooloo S. Wunderlich & Janet L. Norwood eds., 2006).

[13] *Id.* at 43.

[14] *Definitions of Food Security,* U.S. DEP'T OF AGRIC., ECON. RESEARCH SERV. (Oct. 4, 2017), https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/definitions-of-food-security/.

[15] *Id.*

[16] *Id.*

[17] *Id.*

[18] *Id.*

[19] COMM. ON NAT'L STATISTICS, *supra* note 13, at 48.

are distinct.[20] Specifically, hunger is an indicator and a potential outcome of food insecurity and is a condition that researchers and agencies must study on an individual level and separate from food insecurity.[21]

This article will use both the terms "food insecurity" and "hunger." While "food insecurity" will typically describe the conditions described above as "low food security" and "very low food security," some referenced research may use other definitions of food insecurity and those will be distinguished as appropriate. This article will also use the term "hunger" as described above, as the prolonged, involuntary lack of food. As described by CNSTAT,[22] food insecurity usually, but not always, causes hunger. As such, this article will often use both terms. However, the program proposed in this article can only target food insecurity and the hunger resulting thereof.

B. Food Insecurity and Hunger on Campus

There is a significant lack of data regarding the overall problem of hunger and food insecurity on college campuses. Many schools' researchers have collected data on the hunger and food insecurity for a specific campus.[23] This research is important for effective policy advocacy. One study, and subsequent report, aggregated the data of thirty-four campuses — both community colleges and four-year universities — and found 48% of students at those institutions are food insecure.[24] While that survey states its data may skew toward over-representing food insecure

---

[20] *Id.*

[21] *Id.*

[22] *Id.*

[23] *See e.g.*, Kate K Diamond & Michael J. Stebleton, *"Do you Understand What It Means to be Hungry?" Food Insecurity on Campus and the Role of Higher Education Professionals,* THE MENTOR: AN ACAD. ADVISING J. (Apr. 11, 2007), https://dus.psu.edu/mentor/2017/04/do-you-understand-what-it-means-to-be-hungry-food-insecurity-on-campus-and-the-role-of-higher-education-professionals/.

[24] JAMES DUBICK ET AL., NAT'L STUDENT CAMPAIGN AGAINST HUNGER & HOMELESSNESS, HUNGER ON CAMPUS: THE CHALLENGE OF FOOD INSECURITY FOR COLLEGE STUDENTS 7 (2016), http://studentsagainsthunger.org/wp-content/uploads/2016/10/Hunger_On_Campus.pdf.

students,[25] that data is not grossly inconsistent with the findings of other, narrow- scope studies. Recently, the Wisconsin Hope Lab published a broad study on campus hunger.[26] That study found that 36% of four-year university students experience food insecurity.[27] Other studies estimate a range of food insecurity on campus from 14% to 59%, with most studies finding food insecurity in the mid-thirties percent range.[28]

In addition to the limited number and scope of studies, the data on food insecurity and hunger on college campuses is lacking in other ways. The data to date suffers from four major inadequacies and inconsistencies, which make aggregating studies from various institutions difficult. First, current studies inquire about food insecurity over inconsistent durations — from one month to one year.[29] Secondly, the studies that do aggregate

---

[25] *Id* at 15.

[26] *See* GOLDRICK-RAB ET AL., *supra* note 2, at 17.

[27] *Id*. at 10.

[28] *See, e.g.*, Alisha Gaines et al*., Examining the Role of Financial Factors, Resources and Skills in Predicting Food Security Status among College Students*, 38 INT'L J. OF CONSUMER STUDIES 374, 379 (2014) (finding 14% food insecurity at the University of Alabama); Meg Bruening et al., *Factors Related to the High Rates of Food Insecurity among Diverse, Urban College Freshmen*, 116 J. OF THE ACAD. OF NUTRITION & DIETETICS 1450, 1452 (2016) (finding 32% food insecurity over one month and 37% food insecurity over three months at Arizona State University); Loran Mary Morris et al., *The Prevalence of Food Security and Insecurity Among Illinois University Students*, 48 J. OF NUTRITION EDUC. & BEHAVIOR 376, 379 (2016) (finding 35% food insecurity across four public Illinois universities); A. Hillmer et al., *Prevalence of Food Insecurity Among College Students at a Small Midwestern University*, Suppl. 1—Abstracts 117 J. OF THE ACAD. OF NUTRITION & DIETETICS A-92 (2017) (finding 37.5% food insecurity at a small Midwestern University); Linda L. Knol et al., *Food Insecurity, Self-rated Health, and Obesity among College Students*, 48 AM. J. OF HEALTH EDUC. 248, 251 (2017) (finding 37.6% food insecurity at the University of Alabama); R. Holland et al., *Prevalence of Food Insecurity among College Students at a Southeastern University*, Suppl. 1—Abstracts 117 J. OF THE ACAD. OF NUTRITION & DIETETICS A-93 (2017) (finding 48% food insecurity at a Southeastern University); Megan M. Patton-Lopez et al*., Prevalence and Correlates of Food Insecurity Among Students Attending a Midsize Rural University in Oregon*, 46 J. OF NUTRITION EDUC. & BEHAVIOR 209, 210 (Nov. 2014) (finding 59% food insecurity at a midsize, rural university in Oregon — this study includes students enrolled in academic programs other than 4-year undergraduate).

[29] *See, e.g.,* GOLDRICK-RAB ET AL., *supra* note 2, at 10 (one month); Gaines et al., *supra* note 29, at 378 (twelve months); Bruening et al., *supra* note 29, at 1452 (one month and three months); Morris et al., *supra* note 29, at 378 (nine months); A. Hillmer et al., *supra* note 29; Knol et al., *supra* note 29, at 250

information may include four-year universities, two-year programs, and graduate students. This is particularly relevant here, because only students enrolled in four-year undergraduate programs are excluded explicitly from participation in SNAP,[30] see below for more information. The recent Wisconsin Hope study did aggregate several schools and separated data of four-year and two-year institutions.[31] However, even that study only included 35 four-year institutions of the over three thousand four-year institutions in the country.[32] Additionally, much of the data skews toward female students or other demographics.[33] Finally, the inconsistency in recruitment and small sample sizes yield inconsistent results.[34]

The studies mentioned in this article do consistently use a USDA-defined methodology of determining rates of food insecurity. This allows additional researchers and commentators to compare roughly the data from a variety of studies and reports. However, campus food security studies would be stronger if a single entity collected the data and further standardized it. The Department of Education should collect this data for every student in the United States. The Department of Education already collects

(twelve months); R. Holland et al., *supra* note 29 (twelve months); Patton-Lopez et al., *supra* note 29, *at* 210 (did not disclose duration).

[30] 7 U.S.C. § 2015(e) (2015).

[31] GOLDRICK-RAB ET AL., *supra* note 2, at 7.

[32] *Id.*; THOMAS D. SNYDER ET AL., DIGEST OF EDUCATION STATISTICS 2015 62 tbl. 105.50 (51st ed. 2016) (table titled "Number of educational institutions, by level and control of institution: Selected years, 1980-81 through 2013-14"), HTTPS://NCES.ED.GOV/PUBS2016/2016014.PDF.

[33] *See, e.g.,* GOLDRICK-RAB ET AL., *supra* note 2, at 8 (over-represents female students); Gaines et al., *supra* note 29, at 379 (over-represents female students and seniors); Bruening et al., *supra* note 29, at 1452 (likely over-represents female students); Morris et al., *supra* note 29, at 378 (likely over-represents female students, over-represents white students); Knol et al., *supra* note 29, at 251 (likely over-represents female students); Holland et al., *supra* note 29; Patton-Lopez et al., *supra* note 29, at 210 (over-represents female students).

[34] *See, e.g.*, Gaines et al., *supra* note 29, at 379 (finding 14% food insecurity at the University of Alabama); Knol et al., *supra* note 29, at 251 (finding 37.6% food insecurity at the University of Alabama). These studies were only three years apart and at the same institution. Yet, they show vastly different statistics about the number of food insecure students at the University of Alabama. It is not likely that campus food security would change that dramatically over that time.

over thirty datasets; including student migration, demographics, and parental financial status.[35]

Finally, and importantly, participation in a university-sponsored meal plan does little to curb food insecurity.[36] Meal plans, participation in which is often required for first- and second-year students at four-year universities, typically include an option to receive only seven to ten meals per week. These smaller meal plans cost less over the semester, though more per meal, and are, therefore, a frequent choice of low-income students who are more likely to be food insecure. These students may be getting by on little more than one good meal per day. Additionally, the dining hall system relies on students receiving meals at designated food service locations, rather than cooking for themselves in kitchens. In addition to the costs associated with dining hall meals, students are losing valuable skills necessary for life after college.

Researchers have long focused on the impact of food insecurity as it relates to academic and social performance in children.[37] Some recent studies have similarly examined the association of food insecurity and academic performance on college campuses.[38] These studies have found a strong correlation between food security and grade point average.[39]

---

[35] *DataLab*, INST. OF EDUC. SCIENCES: NAT'L CTR. FOR EDUC. STAT., https://nces.ed.gov/datalab/ (last visited May 17, 2018).

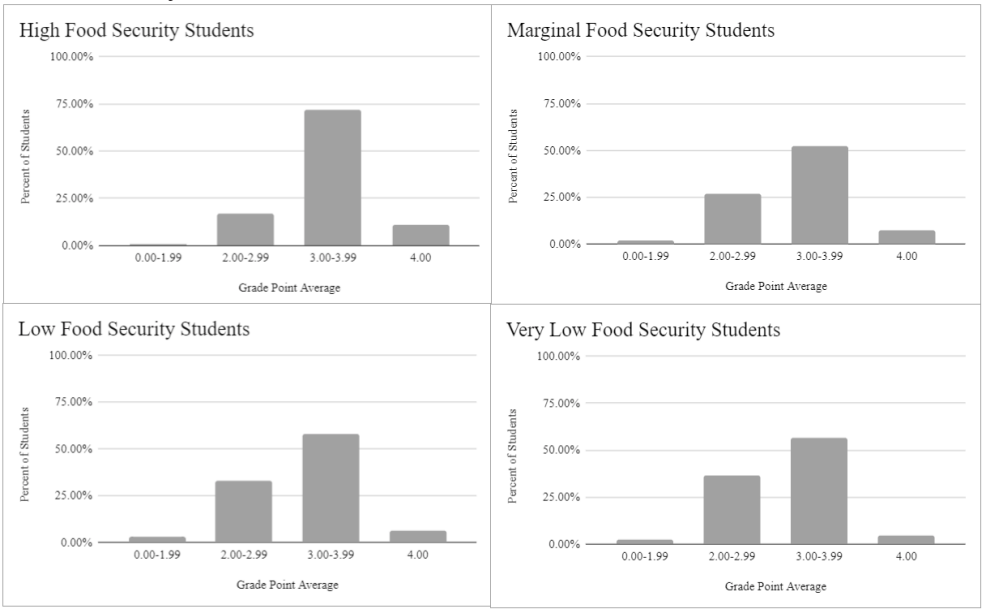
[36] DUBICK ET AL., *supra* note 25, at 8.

[37] *See e.g.*, Diana F. Jyoti et al., *Food Insecurity Affects School Children's Academic Performance, Weight Gain, and Social Skills*, 135 J. OF NUTRITION 2831 (2005) (finding that food insecurity in kindergarten predicts imparted academic performance).

[38] Morris et al., *supra note 29, at* 378; Patton-Lopez et al., *supra* note 29, at 210.

[39] Morris et al., *supra* note 29, at 378; Patton-Lopez et al., *supra* note 29, at 212.

Figure 1. Grade Point Average Distribution by Food Security.[40]



In addition to the clear academic disadvantage for individual students who are affected by food insecurity and hunger, the difference in academic performance could have broader societal implications. Students who experience food insecurity are more likely to be low-income.[41] A positive correlation between students with reduced food security and lower grade point averages likely means low-income correlates with lower grade point average. Grade point averages can be loosely associated with salary, where higher grades result in higher salaries and lower grades in lower salaries.[42] Additionally, these students may have lower educational attainment, as grade point averages are critical in admission to professional degree programs. Due to difficulties in securing higher paying entry-level positions or obtaining graduate degrees,

[40] Morris et al., *supra* note 29 (table created from data found in article).

[41] *See generally* DUBICK ET AL., *supra* note 25.

[42] *See* Philip L. Roth & Richard L. Clarke, *Meta-Analyzing the Relation between Grades and Salary*, 53 J. OF VOCATIONAL BEHAVIOR 386, 396 (1998).

low-income and food insecure students may also have reduced earning potential. This could widen the income gap and further reinforce a cycle of poverty among low-income individuals, even those with college degrees.

Despite the inadequacies in data regarding food insecurity and hunger on campuses, the existing data is conclusive on the severity of the problem. The exact statistics of food insecurity and hunger may vary, but any public health issue that affects between 14% and 59% of students demands attention. This is particularly concerning due to this public health issue's effect on academic performance and earning potential.

C. Economic Burden of Providing Food on Campus

Media outlets and politicians have recently taken up the charge of the student debt crisis.[43] According to the Department of Education, in the fourth quarter of 2017, there were 42.6 million recipients with $1.37 trillion in outstanding federal student loan debt.[44] This averages to more than $32,000 of student loan debt per recipient, just in federal loans.[45] In 2007, the average outstanding debt was a mere $18,233 per recipient. The increase to an average debt over $32,000 for every individual with federal student loan debt represents an increase of 76% in just ten years.[46]

The dramatic and sudden increase in federal student loan debt mirrors similarly dramatic and sudden increases in tuition. Based upon the average advertised cost of four-year universities,

---

[43] *See e.g.*, Elizabeth Bernstein, *The Price of Admission*, WALL ST J. (Apr. 2, 2004), http://online.wsj.com/public/resources/documents/SB108085665347972031.htm; Lee Siegel, *Why I Defaulted on My Student Loans*, N.Y. TIMES (June 6, 2015), https://www.nytimes.com/2015/06/07/opinion/sunday/why-i-defaulted-on-my-student-loans.html; *It's Time to Make College Tuition Free and Debt Free*, BERNIE SANDERS, https://berniesanders.com/issues/its-time-to-make-college-tuition-free-and-debt-free/ (last visited May 16, 2018); Jack Herrera, *How Republicans and Democrats Plan to Attack Student Debt*, USA TODAY (Aug. 3, 2016), http://college.usatoday.com/2016/08/03/how-republicans-and-democrats-plan-to-attack-student-debt/.

[44] *See Federal Student Aid Portfolio Summary*, U.S. DEP'T OF EDUC., FEDERAL STUDENT AID, https://studentaid.ed.gov/sa/about/data-center/student/portfolio (last visited May 16, 2018).

[45] *Id.*

[46] *Id.*

in the last ten years, tuition and fees have increased about 37% and 26% at public and private universities, respectively, even after being controlled for inflation.[47] School tuition increased most strikingly for the 2009-10 academic year, at the peak of the economic recession, when low- and mid-income students could least afford the increase. In that year alone, private universities increased tuition and fees by 5.9% and advertised tuition at public universities increased a staggering 9.5%.[48]

Beyond tuition, many students pay room and board to attend a four-year university. The cost of room and board comprises a significant amount of the total cost of attendance at a university. In terms of percentage, room and board are 52% and 26% at public and private universities, respectively, of the total bill for a year of university attendance.[49] Following the trend of tuition, room and board has also dramatically outpaced the rate of inflation. Between the 2007-08 and 2017-18 academic years, room and board costs increased 25% and 21% at public and private universities, respectfully.[50] In the academic year 2014-2015, the average four-year student paid $4,412 and $5,021 at public and private universities, respectively, for board (meals); making it about half of the cost of room and board.[51] Over a nine-month academic year, board costs about $115 and $131 per week at public and private universities, respectfully.[52]

Each month, the USDA issues a report that details the cost of food when cooking at home, called the Official USDA Food Plans. The reports include four budget levels: the "Liberal

---

[47] *Tuition and Fees and Room and Board over Time*, COLLEGE BOARD, TRENDS IN HIGHER EDUCATION (2017), https://trends.collegeboard.org/college-pricing/figures-tables/tuition-fees-room-and-board-over-time.

[48] *Id.*

[49] *See id.*

[50] *See id.*

[51] THOMAS D. SNYDER ET AL., INST. OF EDUC. SCIENCES, NAT'L CTR. FOR EDUC. STAT., DIGEST OF EDUCATION STATISTICS 2016 605 tbl. 330.20 (52d ed. 2016) (table titled "Average Undergraduate Tuition and Fees and Room and Board Rates Changed for Full-Time Students in Degree-Granting Postsecondary Institutions, by Control and Level of Institution or Jurisdiction: 2013-14 and 2014-15").

[52] *Id.*

Plan," the "Moderate-Cost Plan," the "Low-Cost Plan," and the "Thrifty Plan."[53] The cost of a campus meal plan is dramatically higher than the USDA Food Plans — even "Liberal Plan," has an estimated weekly cost of $85 for a male between the ages of nineteen and fifty.[54] While the meal plans that offer fewer meals per week cost less per week, the cost per meal increases.[55] As a result, in addition to the high cost per meal to every student, students with the fewest financial resources pay the most for their campus dining. The current system poses a dramatic cost to students and exaggerates the student debt burden, but has not been effective in alleviating student food insecurity.

The economic burden of providing food to college students affects not only students, but may also affect their parents. Parents are more likely to provide financial support to their adult children when their children are in need.[56] This often includes financial and food insecurity. There is also evidence that parental support of their adult children has increased over the past generation.[57]

---

[53] See *USDA Food Plans: Cost of Food*, U.S. DEP'T OF AGRIC., CTR. FOR NUTRITION POL'Y & PROMOTION, https://www.cnpp.usda.gov/USDAFoodPlansCostofFood (last visited May 16, 2018).

[54] U.S. DEP'T OF AGRIC., OFFICIAL USDA FOOD PLANS: COST OF FOOD AT HOME AT FOUR LEVELS, U.S. AVERAGE, DECEMBER 2017 (2018), https://www.cnpp.usda.gov/sites/default/files/CostofFoodDec2017.pdf.

[55] *See, e.g.*, *Meal Plans: 2017-2018 Meal Plans*, WILLIAMS COLLEGE, https://dining.williams.edu/meal-plans/ (last visited May 16, 2018) (Smallest meal plan costing about $11.07 per meal over a 9-month academic year; largest meal plan costing about $8.69 per meal over a 9-month academic year); *Columbus Campus Dining Plans*, OHIO STATE UNIV., https://dining.osu.edu/dining-plans/columbus-campus-dining-plans/ (last visited May 17, 2018) (Smallest meal plan costing about $8.38 per meal over a 9-month academic year; largest meal plan costing about $7.75 per meal over a 9-month academic year); *Undergraduate Dining*, RICE UNIV., http://dining.rice.edu/undergraduate-dining/ (last visited May 17, 2018) (Smallest meal plan costing about $8 per meal; largest meal plan costing about $7.59 per meal); *Traditional Meal Plans*, ARIZONA STATE UNIV., https://sundevildining.asu.edu/meal-plans/traditional-meal-plans (last visited May 17, 2018) (Smallest meal plan costing about $8.24 per meal over a 9-month academic year; largest meal plan costing about $7.75 per meal over a 9-month academic year).

[56] *See* Karen Fingerman et al., *Giving to the Good and the Needy: Parental Support of Grown Children,* 71 J. OF MARRIAGE & FAMILY 1220, 1220 (2009).

[57] PATRICK WIGHTMAN ET AL., UNIV. OF MICHIGAN: INST. FOR SOCIAL RESEARCH, POPULATION STUDIES CENTER, HISTORICAL TRENDS IN FINANCIAL SUPPORT OF YOUNG ADULTS 20 (2013), https://www.psc.isr.umich.edu/pubs/pdf/rr13-801.pdf.

While proving such a hypothesis is beyond the scope of this article, it is possible that this increased parental financial support might correlate to increased university expenses and decreased financial and food security. This means that even families whose students do not take out student loans may face significant financial burden due to the increasing cost of attending university.

Additionally, increased university-associated costs, such as food and other expenses, means that parents who support, at a higher rate than previous generations, their college-aged children are diverting money from other expenses and savings, such as retirement, to support their adult children financially.[58] This could cause an important economic ripple effect. If parents are not saving for retirement until later in their careers, they must retire later.[59] This pattern might prevent movement and transition at the highest-level positions in companies. Thus, if executives are not retiring, mid- and entry-level associates cannot advance and there is little space for new hires.[60] This hypothetical chain of events would further compound both the student debt crisis and parental financial dependence by making entry-level employment unattainable resulting in reduced income and greater likelihood of defaulting on student loans.

Universities face similar burdens from the growing expense of campus dining, a system that leaves some students without consistent food access. In the competition to attract academically successful seventeen-year-olds, major universities are in an arms race for the best food and most interesting dining experiences.[61] The National Center for Education Statistics at the Department of Education keeps data on university expenses, but the Center combines campus-dining expenditures with other

[58] Dan Kadlec, *How to Avoid Paying for Your Kids Forever*, TIME (Sept. 10, 2014), http://time.com/money/page/parents-adult-children-financial-support/.

[59] *Id.*

[60] Stephen Miller, *When Workers Won't Retire, Workforce Challenges Arise*, SOC'Y FOR HUMAN. RES. MGMT (Dec. 18, 2014), https://www.shrm.org/resourcesandtools/hr-topics/benefits/pages//workers-not-retiring.aspx.

[61] Cara Newlon, *The College Amenities Arms Race*, FORBES (Jul. 31, 2014), https://www.forbes.com/sites/caranewlon/2014/07/31/the-college-amenities-arms-race/#380ced9c4883.

expenses, such as residence halls, into "auxiliary expenses."[62] However, these expenses, which fund programs that should be self-sustaining, cost public and private four-year universities $3,090 and $4,819, respectively, per full-time student in the 2013-2014 academic year.[63] With every university expenditure, there is an associated opportunity cost; the same is true for campus dining expenditures. When schools spend more money on dining, they have less money to spend on instruction, research, or financial support.

Quality education from a four-year university is an expensive investment. The costs associated with higher education affect students, parents, and the universities, themselves. However, on many campuses, the high cost of postsecondary education does not include reliable access to food. Students must feed themselves on meager, but expensive, meal plans. Parents step in to offer financial support when meal plans fail. Yet, universities spend large amounts on a dining system that will always be outshined by the lavishness of another institution and leaves many students hungry.

D. Supplemental Nutrition Assistance Program Approach to Hunger

The federal government has many programs that work to alleviate hunger and food insecurity across the country, with some programs specifically adapted to regional and community needs. The two with perhaps the largest reach are SNAP, authorized through the Farm Bill,[64] and the National School Lunch Program, last authorized through the Healthy, Hunger-Free Kids Act.[65] This section and the next will briefly explain these two important

---

[62] SNYDER ET AL., *supra* note 33, at 748 tbl. 334.30 (2015) (table titled "Total expenditures of private nonprofit degree-granting postsecondary institutions, by purpose and level of institution: 1999-2000 through 2013-14").

[63] Id. at 745 tbl. 334.10.

[64] 7 U.S.C.A. §§ 2011-2036c; Agricultural Act of 2014, Pub. L. No. 113-79, 128 Stat. 649.

[65] 42 U.S.C.A. §§ 1751-1769j; Healthy, Hunger-Free Kids Act of 2010, Pub. L. No. 111-296, 124 Stat. 3183.

programs.

The Farm Bill is a large omnibus piece of legislation that includes agricultural trade, agricultural commodity support, agricultural conservation, nutrition, and other areas. The Supplemental Nutrition Assistance Program is one of the largest programs in the Farm Bill and makes up the majority of the Nutrition Title (Title IV).[66] Nutrition spending comprises $756 billion over ten years or 79% of the total Farm Bill spending.[67] Congress can amend SNAP with each new iteration of the Farm Bill though the Nutrition Title of the Bill.

SNAP is a monthly benefit program. Each month authorized state agencies provide eligible recipients with an allotment of benefits loaded onto an EBT (Electronic Benefit Transfer) card.[68] In order to be eligible for the program, a recipient's net income must be at or below 130% of the poverty line,[69] which, in 2018, is $12,140 for an individual.[70] The allotment of the benefits is determined by calculating the cost of the USDA's Thrifty Food Plan,[71] less 30% of an individual's income minus deductions.[72] For example, for a 20 year-old, the Thrifty Food Plan is $184, if that individual's income is $200 per month after taking into account any deductions, the recipient would receive $124 per month in SNAP benefits or $184 minus $60, which is 30% of $200. The maximum monthly benefit for an individual in 2018 is $192 and the estimated average benefit for an individual in fiscal

---

[66] *Id.*

[67] Brad Plumer, *The $956 Billion Farm Bill, in One Graph*, WASH. POST (Jan. 28, 2014), https://www.washingtonpost.com/news/wonk/wp/2014/01/28/the-950-billion-farm-bill-in-one-chart/?utm_term=.0a1dcbc9e994.

[68] 7 U.S.C. § 2016 (2012); *see also id.* § 2017.

[69] *Id.* § 2014(c); *A Quick Guide to SNAP Eligibility and Benefits*, CTR. ON BUDGET & POLICY PRIORITIES (Feb. 7, 2018), https://www.cbpp.org/research/a-quick-guide-to-snap-eligibility-and-benefits.

[70] Annual Update of the HHS Poverty Guidelines Notice, 83 Fed. Reg. 2642, 2642-44 (Jan. 18, 2018). 130% of the poverty line would be $15,782 for an individual.

[71] U.S. DEP'T OF AGRIC., *supra* note 55 (for a male individual between 19 and 50 years old, the thrifty plan costs $184.60 per month).

[72] 7 U.S.C. § 2017(a) (2012).

year 2018 is $145.[73] Once the state agency loads these benefits onto the recipient's EBT card, the recipient may then use that card, similar to a debit card, to make approved purchases at any approved food retail store, which includes most food in grocery stores or convenience stores.[74]

SNAP has two limitations that are particularly relevant to college students First, SNAP's authorizing language explicitly excludes students "enrolled at least half-time in an institution of higher education."[75] Some students are exempt from the blanket exclusion of college or university students from SNAP if the student works more than twenty hours per week, is not between the ages of eighteen and fifty, or meets other exemption criteria.[76] Second, SNAP is only available to able-bodied adults without dependents for three months in a three-year period.[77] Both of these present challenges to using SNAP to prevent food insecurity and hunger on college campuses.

There are certain exceptions to this general disqualification. Importantly, students who work more than 20 hours per week or participate in work-study may participate in SNAP.[78] Additionally, students who are parents or enrolled in some career or technical education programs may also qualify for SNAP.[79] However, only 27% of full-time students are employed and work more than 20 hours a week,[80] and therefore, most college students are prevented

---

[73] Letter from Lizbeth Silbermann, Director, Food and Nutrition Service, to All Regional Directions of Supplemental Nutrition Assistance Program (July 28, 2017), https://fns-prod.azureedge.net/sites/default/files/snap/SNAP_Fiscal_Year_2018_Cost_of_Living_Adjustments.pdf; *see Supplemental Nutrition Assistance Program (SNAP) – National Data: National View Summary*, U.S. DEP'T OF AGRIC., FOOD & NUTRITION SERV., HTTPS://WWW.FNS.USDA.GOV/PD/SUPPLEMENTAL-NUTRITION-ASSISTANCE-PROGRAM-SNAP (last updated May 4, 2018).

[74] 7 U.S.C. § 2016(b) (2012).

[75] *Id.* § 2015(e).

[76] *Id.*

[77] *Id.* § 2015(o)(2).

[78] *Id.* § 2015(e)(4).

[79] 7 U.S.C. § 2015(e)(3),(5) (2012).

[80] *College Student Employment*, THE CONDITION OF EDUCATION, https://nces.ed.gov/programs/coe/indicator_ssa.asp (last updated May 2017).

from accessing SNAP benefits. Moreover, only 56% of food insecure students are employed and only 38% of those employed work over 20 hours per week.[81] This means that 79% of food insecure students are either not employed or work fewer than 20 hours per week. This exception to the general disqualification of traditional college students does not reach most of the food insecure and hungry students on campuses.

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 imposed limitations on SNAP. The act limits any able-bodied recipient with no dependents to only three months of benefits within any three-year period.[82] There are certain exceptions to this restriction, including if a recipient works more than an average of twenty hours per week.[83] The three-month limitation of SNAP benefits for non-working able-bodied adults without dependents is called the "work requirement."[84] Under the authorizing statute, state agencies are given the authority to waive the work requirement in areas in which the unemployment rate is over 10% or there is an insufficient number of jobs to provide employment to all individuals.[85]

SNAP is a powerful food insecurity and hunger alleviation tool managed by the federal government. Through the monthly EBT structure, SNAP preserves individuals' dignity and teaches valuable skills in finance management. However, under SNAP's current design, it is unable to reach the food insecure and hungry students at four-year traditional universities. The few exceptions for students who work at least twenty hours per week are inadequate to sustain food security.

---

[81] DUBICK ET AL., *supra* note 25, at 6.

[82] Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. 104-193, § 824, 110 Stat. 2105, 2323-24.

[83] 7 U.S.C. § 2015(o)(2)(A) (2014).

[84] *Id.*

[85] *See id.* § 2015(o)(4) (2014).

E. Healthy, Hunger-Free Kids Act Approach to Hunger

Championed by First Lady Michelle Obama, the Healthy, Hunger-Free Kids Act (HHFKA) included several innovations on the National School Lunch Program (NSLP).[86] The NSLP provides free and reduced-price meals to children while they are at primary and secondary school. Chief among the HHFKA innovations is expansion of automatic enrollment in the NSLP if a child's family participates in SNAP, Medicaid, Head Start, or other federal programs.[87] These students, who receive free lunch without an additional application, are "identified students."[88] In order to identify these students, HHFKA relies on interagency communication and coordination.[89] Further building on the strength of the "identified students" system, schools could elect to participate in the "community eligibility provision" (CEP). CEP created a model in which schools with at least 40% identified students could provide free lunch to all students in the school.[90]

HHFKA is an example of successful interagency coordination. By eliminating administrative burdens for parents, more students are able to participate in the NSLP. As will be explained, SNAP could build on the success of this program by similarly creating an automatic enrollment program based on participation in other federal programs.

F. Federal Need-Based Postsecondary Education Support Programs

Under Lyndon Johnson's Great Society agenda, the federal government implemented and continues to maintain several programs designed to help students pay for college.[91] At the signing of the Higher Education Act of 1965, President Lyndon Johnson said that Congress had opened a new door for

---

[86] *See* National School Lunch Program, 42 U.S.C. §§ 1751-1769j (2012).
[87] 7 C.F.R. § 245.9(f)(1)(ii) (2016).
[88] *See id.*
[89] *See id.*
[90] *See id.*
[91] Higher Education Act of 1965, Pub. L. 89-329, 79 Stat. 1219.

young people and "it is the most important door that will ever open — the door to education. And this legislation is the key which unlocks it."[92]

Many of these federal postsecondary education support programs are available to all students regardless of financial need, while others are reserved for students with demonstrated financial need. Federal financial assistance is divided into three categories — grants, loans, and work-study.[93] The federal government determines need through a formula by calculating the cost of attendance minus expected family contribution minus financial assistance from other sources.[94] Typically, the government obtains this information when students file their online "Free Application for Federal Student Aid" or "FAFSA."[95] There are five federal, need-based programs. Two of these programs are grant-based and do not require repayment — Pell Grants[96] and Federal Supplemental Education Opportunity Grants.[97] Two other federal aid programs are low interest or no interest loans — Perkins Loans[98] and Federal Direct Stafford Loans ("Subsidized Loans").[99] The fifth program helps students pay for college when they work in addition to taking classes — Work-Study.[100] Eligibility for these programs is not tied to the federal poverty line, in the way that SNAP or the NSLP are, but is instead more dynamic, reflecting both the cost of the education and financial resources of the student.[101]

---

[92] Lyndon B. Johnson, *Remarks on Signing the Higher Education Act of 1965*, Texas State University (Nov. 8, 1965), http://www.txstate.edu/commonexperience/pastsitearchives/2008-2009/lbjresources/higheredact.html.

[93] *See* 20 U.S.C. §§ 1070-1070h (2012).

[94] *See id.* § 1087-2.

[95] *See id.* § 1090(a)(1).

[96] *See id.* § 1070a(a).

[97] *See id.* § 1070b-1(a).

[98] *See* 20 U.S.C § 1087 (2012).

[99] *See id.* §§ 1078(a)(2); *see id.* 1087e(a)(2)(A).

[100] *See id.* § 1087-52(c)(2) (2008).

[101] *See* 20 U.S.C. § 1087.

II. Expanding SNAP to Meet the Needs of College Students

As described above, the current system of feeding America's postsecondary students is expensive and does not alleviate food insecurity or hunger. Many students, who are the future leaders and current innovators of the country, face declining academic performance related to food insecurity and hunger. This section will propose a program that would allow more college students to access food using SNAP benefits.

The partial solution outlined in this article to the problems of hunger and food insecurity on college campuses is two-pronged. The first prong removes the barrier for college students wishing to participate in SNAP. This proposal eliminates the current exclusion of traditional, four-year college students from SNAP benefits by simply repealing § 2015(e) and creating an exception to the work requirement.[102] The second component of the program actively facilitates enrollment in SNAP. Standing on the shoulders of the widely supported HHFKA, states should automatically enroll college students in SNAP according to data reported to the federal government in applying for student financial assistance. This section will describe each of these portions of this proposed federal program to stymie hunger on campuses.

A. Remove College Student SNAP Participation Disqualification

First, Congress must remove the exclusion of four-year college students from receiving SNAP benefits.[103] Currently, SNAP is only available to traditional four-year university students without dependents if those students are enrolled in work-study or work more than twenty hours per week.[104] As described above, these exceptions are quite small in comparison to the total student population experiencing food insecurity or hunger. By simply

---

[102] 7 U.S.C. § 2015(o).
[103] *Id.* § 2015(e).
[104] *Id.*

striking the language of § 2015(e), Congress would permit the participation of 80% of food insecure and hungry students who do not work more than twenty hours per week.

Congress must also exempt students from the "work requirement" for able-bodied adults without dependents. Currently, the issue of only receiving benefits for three months in a three year window does not occur when making SNAP eligibility determinations for college students. This is because the college students who may currently enroll in SNAP are those who are working at least twenty hours per week and, thereby, satisfy the work requirement. However, if Congress made SNAP available to all college students that demonstrate financial need, it must also remove the work requirement for those students.

Congress should use one of three drafting strategies to make sure that the three-month limit does not apply to university students. First, Congress may accomplish this by adding "full-time student" to the list of exceptions to the work requirement.[105] Second, Congress could redefine "work twenty hours" to recognize the over twenty hours of work per week that students invest in a full-time course load. This alteration, however, would require a formulation to adapt enrolled credit hours into working hours and could quickly become complicated; for example, two semester credit hours would convert to one working hour. Alternatively, Congress could completely remove the 1996 "work requirement." The latter option is likely the least politically feasible. As Congress debates its steps forward in balancing the budget amid government shutdowns, a proposal to significantly expand SNAP to all recipients would likely not be met graciously.

There is one existing loophole to the "work requirement." States may waive the "work requirement" in high poverty areas.[106] As mentioned above, only about half of university students are employed. This would meet the definition waiver requirement

---

[105] *Id.* § 2015(o)(3).
[106] *Id.* § 2015(o)(4).

of unemployment greater than 10% in a particular area, [107] specifically within the university's campus and student housing areas. Seemingly, the size of the allowable area for a state waiver is not defined and has not been tested in the courts. This would be a promising option if Congress only removes the exclusion of traditional college students from receiving SNAP, but does not remove the work requirement. The drawbacks with this approach are that it would rely on states to identify the problem of food insecurity and hunger on campuses, and to act on that information. This strategy would ultimately result in an unequal distribution of SNAP benefits, with students in some states receiving benefits and others not.

The best option is for Congress, in addition to repealing § 2015(e), to create an explicit exception to the "work requirement." This would provide the greatest access to SNAP for college students in a way that simplifies the law, rather than further complicates it. This strategy also has the greatest political feasibility, to the extent that any SNAP expansion is currently politically feasible.

B. Enroll Federally Supported Students in SNAP

The second prong of the federal program to enroll traditional college students in SNAP revolves around the direct enrollment of students. Because states execute the eligibility determinations for SNAP,[108] this plan requires that state governments are responsible for the enrollment of college students in SNAP. Similar to HHFKA, the program would enroll students based on data obtained through other programs. However, distinctions between HFFKA and automatic enrollment of students in SNAP are necessary. Primarily, SNAP and NSLP eligibility are both contingent on a particular income relative to the federally determined poverty line. However, the need-based programs through the Department of Education include the cost

---

[107] 7 U.S.C. § 2015(o)(4)(A)(i).
[108] *Id. §* 2014.

of attendance in their need determinations and, as mentioned above, this metric is dynamic, not static. Therefore, it would not be practical for state agencies to directly enroll recipients in the "if SNAP, then NSLP" manner of HHFKA. Instead, the Department of Education compiles student financial data through FAFSA, and state agencies could then use this data to enroll students.

In order for state agencies to enroll students in SNAP, the Department of Education, which maintains student financial records, must release the aid information to the necessary state agencies. This plan would be similar to the successful interagency coordination mandated in HHFKA. Drafters could use the language directly from HHFKA, which requires appropriate access to information and includes penalties for misuse of information. The details of the FAFSA sharing scheme must be defined by federal regulation. It would also be necessary for the statute and regulations to define the exact criteria for automatic enrollment; this would make the program more predictable for students.

In implementing this two-pronged program, the federal government could make strides in curbing food insecurity and hunger on campuses. More needy college students would be eligible for SNAP by removing the disqualification of college students and altering the "work requirement." Through effective information sharing, state agencies could directly enroll low-income college students in SNAP.

III. Benefits and Challenges of SNAP Expansion

The two-pronged approach of addressing SNAP benefits for college students has many benefits beyond reducing food insecurity and hunger on campuses. The next section will describe what some of those benefits might include. The following section is intended to describe some of the potential benefits and outline where more research must be conducted to further understand whether these benefits are achieved by SNAP access to college students. The subsequent section will describe the administrative hurdles of implementing the program outlined in this article.

A. Benefits of SNAP Program for Undergraduates

The primary benefit of the program to students is the alleviation of food insecurity and hunger during their college years. However, the benefits may extend beyond simply providing food. Students may attain greater financial independence, which has the potential to instill a sense of dignity and build financial management skills. Students may then matriculate from their undergraduate programs with less debt. This reduced burden might allow recent graduates to pursue public interest work or other lower-salary positions. Allowing students to eat at a lower cost may prevent the continued cycle of poverty related to academic performance, as described previously. Additionally, if students gain further financial security due to SNAP benefits, those students may be less dependent on financial assistance from their parents.

Beyond the financial benefits, participation in SNAP could help students develop necessary cooking skills. If schools would provide students with resident hall kitchens, those students could develop and maintain cooking skills that are essential to healthy and cost-efficient eating. These skills help contribute to life-long food security.

Universities could also benefit from the expansion of SNAP to low-income college students. Schools, who are concerned about access to food on their campuses, will not have to contribute funds to meal plans in order to increase their accessibility to low-income students. The program also generally reduces the cost of providing food on campus, by allowing students to participate in smaller programs, supplemented by SNAP. Finally, this program encourages schools to provide greater access to residence hall kitchens and off-campus housing options. This may slow or end the dining hall "arms race", in which facilities that are more lavish are necessary to attract academically competitive high school graduates.

Some benefits may be less measurable; namely the benefits to the program itself. University students are a segment of the general population with substantial political capital. Once

these students graduate to become societal and political leaders, their experiences with SNAP could inform commonsense policy improvements in the future. These students would also come to understand, by either first- or second-hand, the benefits and drawbacks of federal entitlement programs. The program outlined in this article could provide SNAP greater visibility nationwide and decrease stigma among other recipients.

B. Challenges in Administering Undergraduate SNAP Changes

Any policy proposal of this magnitude faces significant challenges in its effective administration. Many of these challenges can be resolved through continued research. One possible difficulty with administering this program is that out-of-state students may have to establish residency in a state in order to qualify for that state's social services. This process prevents fraud by ensuring that non-resident individuals do not receive services in more than one state. A possible solution to this problem may be to restrict the program to only in-state students. However, this alteration would shrink the program significantly and not serve students who are food insecure or hungry. Another possible solution is to grant eligible students temporary residency for students during their four-year tenure.

College students often take longer to receive their degrees than the expected four years. Politicians might be uncomfortable with allowing students to receive benefits for an indefinite amount of time. In drafting legislative language that expands options for college and university students, Congress could limit students to only receiving SNAP benefits for five years as an undergraduate student or even require a particular grade point average to ensure that the changes to SNAP do not incentivize poor academic performance.

An additional hurdle facing the program is reliable access to kitchens. Because current campus-dining programs require students to eat meals prepared in dining halls, many students, particularly underclassmen, do not have access to cooking

facilities. Furthermore, SNAP forbids the use of benefits on hot foods. Therefore, SNAP must be used to purchase raw ingredients or packaged foods requiring kitchen preparation. This program would require that universities provide kitchen-access to students or permit off-campus housing. Residence hall kitchens could be communal — for example, only one large kitchen per residence hall — but all students should have access. Federal law could begin to require cooking facilities in newly constructed student housing facilities.

Lastly, many students file FAFSA and taxes as dependents, even if they, in actuality, receive little financial support from their parents. This may prevent students from accessing SNAP benefits. Further research should determine how many students this discrepancy effects. If a significant number of students are affected, schools and states should consider simplifying processes for undergraduate students to establish independence. One solution could be that undergraduate students default to independent status, similar to graduate students, unless the student and his or her parents claim otherwise.

The above challenges to expanding SNAP to college students are not insurmountable. Further research may help illuminate the best path forward. Governments and institutions must find innovative solutions to the problem of food insecurity and hunger on America's college campuses.

Conclusion

The status of food insecurity and hunger on college campuses is alarming. The federal government is well situated to make changes to the administration of SNAP. The recommendations proposed in this article are to eliminate the disqualification of college student participation and initiate an automatic enrollment of eligible college student recipients in SNAP. This new program has the potential to dramatically affect food insecurity and hunger on college campuses nationwide. This article did not address the federal economic impact of significantly expanding SNAP and further research is necessary to complete a full economic analysis

of the program described above.

Beginning with HHFKA and then moving to SNAP, this program could be part of an eventual movement to consolidate all federal benefits into a single FAFSA-style application. The government could eventually even move to automatically enroll eligible participants in federal programs when an individual files his or her taxes.

The SNAP expansion outlined in this article is only one proposed piece in the greater fight to end food insecurity and hunger on college campuses. In addition to the points of further research mentioned throughout this article, researchers, potentially through the Department of Education, must work to more fully understand the determinants of food insecurity on college campuses.