



March 28, 2019

Certification Policy Branch  
SNAP Program Development Division  
Food and Nutrition Service (FNS)  
3101 Park Center Drive  
Alexandria, VA 22302

RE.: RIN 0584-AE57

Dear Sir/Madam:

The American Association of Community Colleges (AACC) welcomes this opportunity to comment on the U.S. Department of Agriculture's proposed rule changes to the Supplemental Nutrition Assistance Program (SNAP) requirements for Able-Bodied Adults without Dependents (ABAWDs). We are concerned about the proposed changes to further restrict food assistance to low-income individuals, including those trying to achieve greater economic self-sufficiency by attaining postsecondary education credentials.

AACC represents the nation's 1,051 community colleges. Each year, millions of students enroll in community colleges seeking to acquire new skills, certificates, and degrees. Today's rapidly changing economy demands a highly skilled workforce and community colleges offer students of all ages opportunities to enhance their skills.

Under the current federal law, non-disabled adults (aged 18-49) without dependents are limited to 3 months of SNAP in a 36-month period, unless they engage in work or job training activities at least half time. The proposed rule would limit states' authority to waive those time limits in areas of high unemployment or lack of sufficient jobs. While students enrolled at least half time would remain exempt from the time limits, the many students enrolled less than half time would lose their benefits. The proposed rule will result in less access to critical nutrition assistance for students without dependents as well as noncustodial parents who are enrolled less than half time.

Student hunger has been a growing concern among community college administrators. Studies have demonstrated how important access to food is and how many community college students are food insecure. Without SNAP, many low-income community college students find it difficult to concentrate on their studies and less assistance would impact persistence. Changes in the rules also may discourage students from even applying for benefits.

The proposed rule changes will deprive some low-income college students of food assistance, adversely impacting their education and training plans and, by extension, their families and local economies. We respectfully ask the Department to withdraw these proposed rule changes to the SNAP program.

Sincerely,

A handwritten signature in black ink that reads 'Walter S. Bumphus'.

Walter Bumphus, Ph.D.  
President and CEO