

June 4, 2021

The Honorable Lou Correa
United States House of Representatives
2301 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Chris Stewart
United States House of Representatives
166 Cannon House Office Building
Washington, D.C. 20515

Re: The Improving Mental Health Access for Students Act

Dear Representatives Correa and Stewart:

On behalf of the higher education associations listed below, representing approximately 4,300 two- and four-year public and private nonprofit colleges and universities, I write regarding the Improving Mental Health Access for Students Act (H.R. ____). As you may know, companion legislation (S. 1585) sponsored by Sens. John Kennedy and Kyrsten Sinema has recently passed the Senate, without committee consideration or floor debate, and has been referred to the House.

The legislation would require colleges and universities, as a condition of participating in the Department of Education's student financial aid programs, to provide on the back of every student ID card the phone contact information for the following three resources: (1) the National Suicide Prevention Lifeline; (2) the Crisis Text Line; and (3) a campus mental health center or program. Institutions that do not use student ID cards would be required to post this information on their website.

Colleges and universities strongly support ensuring that students have information they need to access available mental health resources, including suicide prevention resources. The pandemic has unquestionably taken a toll on college students' mental health.¹ A recent report, *"Constant Stress Has Become the New Normal": Stress and Anxiety Inequalities Among U.S. College Students in the Time of COVID-19*, found that one-third of college students reported emotional distress brought on by the coronavirus pandemic.² In the American Council on Education's most recent Pulse Point Survey, more than 70 percent of college presidents surveyed identified student mental health as among their most pressing issues, with presidents reporting they most frequently hear about students with anxiety, followed by depression.³

¹ <https://www.pbs.org/newshour/show/how-the-pandemic-is-impacting-college-students-mental-health>

² [https://www.jahonline.org/article/S1054-139X\(20\)30646-7/fulltext](https://www.jahonline.org/article/S1054-139X(20)30646-7/fulltext); see also <https://diverseeducation.com/article/200999/>

³ <https://www.acenet.edu/Research-Insights/Pages/Senior-Leaders/College-and-University-Presidents-Respond-to-COVID-19-2021-Spring-Term.aspx>

While we strongly support the goal of increasing student awareness of available mental health resources, we are concerned that the legislation fails to provide campuses with sufficient flexibility in the specific resources they highlight and the manner in which they are shared with students. Without this flexibility, some institutions will be unable to meet the bill's requirements, others will be forced to make expensive or undesirable changes to their student ID cards or eliminate them entirely, and institutional efforts to provide the best possible information about available mental health resources may be undermined.

College and university student ID cards vary significantly from campus to campus in their format, usage, and purpose. For example, some student ID cards are small swipe tags or key fobs that do not have room to include three numbers. On some campuses, students need to carry their student ID with them at all times to access services and campus buildings. On others, student IDs may be distributed to only a fraction of the student population and may have little functional use other than to allow students to receive discounts from local businesses. Some campuses now provide students with the option of a smart phone app that serves as a mobile ID card. We see a trend away from physical student ID cards—the fact that some institutions would face significant expense revising their cards to meet the bill's requirements may hasten this trend, making policies dictating the information printed on these cards increasingly obsolete.

For those institutions that do provide physical student ID cards, the cards often include contact information for a variety of important resources, such as campus police, the student health center, mental health resources (either on or off-campus), suicide prevention resources (national hotlines, state hotlines, on or off-campus programs), campus sexual assault prevention and survivor resources, campus escort services for students walking alone at night, “safe ride” services for students who have been drinking, the students affairs office, confidential sexual assault survivor counseling, the Title IX coordinator, and domestic or dating violence hotline numbers. Many of these institutions would need to remove some or all of their current resources to make room for the three numbers required by the legislation. Furthermore, a number of states are considering or have already adopted state laws requiring institutions to list a mental health or suicide prevention number on their student ID cards. The legislation has the potential to undermine these carefully considered state policies, which typically provide far greater flexibility to campuses to determine the resources that will best meet the needs of their students.⁴

The availability of mental health resources also varies widely between campuses. While some campuses have the resources to provide extensive, high-quality mental health counseling services for students on campus, others do not and may partner with a local community-based organization. We note that institutions that do not have a “campus mental health center or program” would be unable to meet the requirements of the legislation.

Finally, the mental health resources most beneficial to a particular student population are likely to vary across institutions. While some campuses already provide some or all three contact numbers called for in the legislation, these may not be the best resources for every

⁴ See, for example, Maryland SB 405, 2021 and California SB 972, 2018.

campus setting. Institutions with extensive, high-quality mental health resources may prefer to steer students to their own campus programs rather than a national hotline, to ensure students receive in-person services quickly and have access to ongoing monitoring and support. These campus programs may also be aware of prior mental health challenges facing a particular student. For students at institutions that do not have these campus services, the best resource for students may be a local community-based organization, or perhaps a campus-sponsored telemental health option. Again, colleges and universities, with the advice of college counseling and mental health professionals, are in the best position to determine the mental health resources that will most effectively meet the needs of their students.

Colleges and universities strongly support ensuring that their students have the information they need to access available mental health services. For students experiencing a mental health crisis, this is literally a matter of life or death. However, prescriptive, one-size-fits-all requirements have the potential to undermine campus efforts. We would welcome the opportunity to meet with you, as well as with Chairman Bobby Scott and Ranking Member Virginia Foxx of the House Committee on Education and Labor, to address these concerns and to help ensure that students have the information they need.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell".

Ted Mitchell
President

Cc: The Honorable Robert C. "Bobby" Scott, Chairman
U.S. House Committee on Education and Labor

The Honorable Virginia Foxx, Ranking Member
U.S. House Committee on Education and Labor

On behalf of:

Achieving the Dream
ACPA-College Student Educators International
AHEPPP: Family Engagement in Higher Education
American Association of Colleges for Teacher Education
American Association of Collegiate Registrars and Admissions Officers
American Association of State Colleges and Universities
American College Health Association
American Council on Education
American Dental Education Association
American Indian Higher Education Consortium
APPA, "Leadership in Educational Facilities"
Association for Student Conduct Administration

Association for University and College Counseling Center Directors
Association of Catholic Colleges and Universities
Association of College and University Housing Officers-International
Association of College Unions International
Association of Community College Trustees
Association of Governing Boards of Universities and Colleges
Association of Independent California Colleges and Universities
Association of Independent Colleges and Universities in Massachusetts
Association of Jesuit Colleges and Universities
Association of Public and Land-grant Universities
Association of Research Libraries
Coalition of Urban and Metropolitan Universities
Consortium of Universities of the Washington Metropolitan Area
Council for Christian Colleges & Universities
Council for the Advancement of Standards
Council of Independent Colleges
EDUCAUSE
Higher Education Consultants Association
Hispanic Association of Colleges and Universities
NAGAP, The Association for Graduate Enrollment Management
NASPA - Student Affairs Administrators in Higher Education
National Association for Equal Opportunity in Higher Education
National Association of Campus Card Users
National Association of College and University Business Officers
National Association of Colleges and Employers
National Association of Independent Colleges and Universities
National Association of Student Financial Aid Administrators
NIRSA: Leaders in Collegiate Recreation
Society for College and University Planning
State Higher Education Executive Officers Association
University Risk Management & Insurance Association