May 12, 2021

The Honorable John Neely Kennedy  
The Honorable Kyrsten Sinema  
United States Senate  
United States Senate  
416 Russell Senate Office Building  
317 Hart Senate Office Building  
Washington, D.C. 20510  
Washington, D.C. 20510  

Re: The Improving Mental Health Access for Students Act

Dear Senators Kennedy and Sinema:

On behalf of the higher education associations listed below, representing approximately 4,300 two- and four-year public and private non-profit colleges and universities, I write regarding S.___, the Improving Mental Health Access for Students Act.

The bill 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, titled “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 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 are most frequently hearing about students with anxiety, followed by depression.³

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

¹ https://www.pbs.org/newshour/show/how-the-pandemic-is-impacting-college-students-mental-health
² 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
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 student 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 will face significant expense revising their cards to meet the bill’s requirements may hasten this trend. While we appreciate that the bill allows institutions to post the required information on their websites instead, policies dictating what information must be printed on these cards may soon be obsolete.

For institutions that still provide physical student ID cards, there is a variety of other important resources that may already be included on these cards. For example, some campuses include contact information for the campus police, the student health center, mental health resources (either on or off-campus), and campus sexual assault prevention and survivor resources. Many of these institutions would need to remove these resources to make room for the three numbers required by the legislation.

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 who 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 of the three contact numbers called for in the legislation, these may not be the best resources for every 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, in addition to accessing 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 college 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 in this area. We
would welcome the opportunity to meet with you, as well as with Chair Murray and Ranking Member Burr of the Senate Committee on Health, Education, Labor and Pensions, to address these concerns and to help ensure that students have the information they need to access these important resources.

Sincerely,

Ted Mitchell
President

Cc: The Honorable Patty Murray, Chair
U.S. Senate Committee on Health, Education, Labor and Pensions

The Honorable Richard Burr, Ranking Member
U.S. Senate Committee on Health, Education, Labor and Pensions

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
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 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