



Office of the Under Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington DC 20202

February 23, 2024

Dear Under Secretary Kvaal,

Thank you for the opportunity to comment on the Department of Education's (ED's) solicitation for best practices around supporting mental health for today's students and how the Department can provide guidance to institutions of higher education (IHEs) looking to support students. Even before the pandemic, the mental health crisis on campus was quickly becoming more extensive than many IHEs had the infrastructure to support. In the fall of 2023, [71% of students cited that they experienced mental health issues](#) such as stress, anxiety, or depression. That number is staggering, and there are many opportunities to help IHEs address the mental health needs of their students.

The Today's Students Coalition (TSC) is a cross-cutting group of over 40 policy, advocacy, and membership organizations that have joined forces to push for urgently needed policy changes to better serve today's students.

We believe there are concrete, tangible ways in which the mental health crisis on campuses nationwide can be addressed through institutional and policy reforms.

Policy Reforms:

1. Supporting Students' Basic Needs - Addressing mental health challenges requires a holistic approach to ensuring students are supported. There is a [direct correlation](#) between lack of access to basic needs and struggles with mental health. Brain chemistry changes without [adequate nutrition](#), and having a safe space to sleep, the ability to get to and from school, and access to regular healthcare removes excess stress on students, allowing them to better focus on their studies and have peace of mind. Yet, unfortunately, based on the most recent NPSAS data released by ED, approximately [22.6%](#) of students struggle with low or very low food security, and [8%](#) struggle with housing insecurity.

In 2022, ED sent a "Dear Colleague" letter encouraging financial aid administrators to connect their most in-need students with public benefits. While the letter was a step in

the right direction, only about [27% of IHEs provided direct outreach to students based on this guidance from ED](#). This number could become much higher if ED:

1. [Provided](#) more explicit guidance to institutions by clarifying what is considered protected data under the Family Educational Rights and Privacy Act (FERPA) regarding data sharing within an institution;
2. [Updated](#) the guidance to clarify that state university systems, community college systems, and state student aid and authorizing agencies may also use these data; and
3. [Clarified](#) what is considered federal tax information and what is not on the new FAFSA.

2. Add priorities for grants such as the Post-Secondary Success Grants to test, refine, evaluate, and scale effective mental health strategies for college students. We also encourage ED to connect the relevant data related to this work.

Institutional Practices:

1. Faculty and Staff Training - Faculty and staff are often the first line of defense as they are the ones who interact with students regularly. Many, however, do not have the training or expertise to identify a student who is struggling or effectively direct the student to where they can get help. Many IHEs, such as [Penn State](#), have instituted faculty and staff training on effective ways to identify and help students facing a mental health crisis.

2. Address the stigma - While the national conversation has come a long way in removing the stigma around getting mental health support, there is more work to be done to remove the stigma and its negative impacts entirely. Students needing help might be nervous or hesitant to seek assistance, and forego the care they need. [Campuses have found ways to address this creatively](#). Some have embedded a trained clinician in academic departments, resource centers, and veterans centers who build natural relationships with students. As they gain the student's trust, they can open up and begin sharing what is going on in their life, creating natural opportunities for therapy.

3. Group Therapy - Not all individuals need one-on-one therapy. For many, group therapy has proven to be an effective form of treatment. Knowing others are going through similar situations can help reduce loneliness, stigmas around getting help, and [many other benefits](#). It also is an effective way for IHEs whose mental health care practitioners are at capacity to provide support for more students.

4. Social Connection - IHEs have started to see the many benefits of providing opportunities such as [group therapy, peer support groups, or peer counseling](#). This includes programs such as [Collegiate Recovery Programs](#), campus based communities of students in substance disorder recovery, many that are peer led.

Additionally, continuing to offer [opportunities for social engagement](#) such as extracurricular clubs, arts education, sports, and outdoor activities create space for social connection helping to alleviate feelings of loneliness and create healthy outlets.

5. Partner with organizations like [The Jed Foundation \(JED\)](#), which provides direct support and resources to college campuses to help them better support their students. There is no need for IHEs to reinvent the wheel. Organizations such as JED have the resources and information available to help support IHEs in their efforts to build and enhance these support services.

We appreciate ED's effort to address the growing mental health crisis on college campuses throughout the country and look forward to working with you on this issue.

Sincerely,

The Today's Students Coalition
Higher Learning Advocates
Achieving the Dream
America Forward
Center for Higher Education Policy and Practice
Center for First-generation Student Success
Inside Track
Institute for Higher Education Policy
Jobs for the Future
LeadMN
Let's Get Ready
NASPA
National College Attainment Network
New America, Center for Education and Labor, Higher Education Program
Student Basic Needs Coalition
Student Veterans of America
The Hope Center for College, Community, and Justice
The Jed Foundation
University of California Student Association
UPCEA
Young Invincibles