April 23, 2012

Ms. Zakiya Smith  
Senior Advisor for Education  
White House Domestic Policy Council  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

Dear Ms. Smith,

The American College Health Association (ACHA) respectfully writes to provide comment and input regarding the draft College Scorecard comparison tool that will be available through the Department of Education’s (DOE) web-based “College Affordability and Transparency Center.” Founded in 1920, ACHA is a non-profit national health association that represents multidisciplinary college health professionals and their student health centers. ACHA conveys the interests of more than 2,500 physicians, physician assistants, nurses and advanced practice nurses, nurse-directors, mental health professionals, health promotion professionals, health administrators, pharmacists, and support staff, as well as over 900 student health centers nationwide.

ACHA supports the Administration’s efforts to provide clear, accurate and pertinent consumer information to students and their families when selecting a postsecondary institution. As we understand it, the College Scorecard is intended as one such tool to make it easier for students and their families to identify and choose high-quality, affordable colleges that provide good value. “Costs” is portrayed as one of the key measures and the draft scorecard is premised on an institution’s determination of “tuition and fees only” as an element of those costs.

The DOE Office of Federal Student Aid’s published guidelines on determining Cost of Attendance (COA) are silent relative to health expenses for college students. If the COA template will serve as the basis for the “Tuition and fees only” scorecard benchmark, then ACHA strongly recommends that a uniform definition be used which includes the student’s health related costs (administrative health fees and health insurance premiums) when deriving the final COA figure. Many institutions of higher education assess fees for campus-based health services, and require students to enroll in a health insurance plan sponsored by the school if they do not have other adequate health insurance coverage. The aforementioned costs are not insignificant. Combined, these annual costs can be several thousand dollars, and if not clearly, consistently and openly factored into the comparison tool, potentially misleading and incomplete information will be conveyed to the consumer.
ACHA respectfully urges consistent inclusion of these health costs; or, alternatively, unambiguous guidance that uniformly and expressly excludes these health related costs from the College Scorecard “Costs” measurement. We thank you for the opportunity to comment and for your consideration of the college health perspective. ACHA stands ready to provide any additional information that may be helpful.

Sincerely,

[Signature]

Anita Barkin, DrPH, MSN, CRNP
President, American College Health Association