



American College Health Association

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December 2, 2003

Louis Cantilena, MD, PhD
Chair, Nonprescription Drugs Advisory Committee
United States Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857-0001

Dear Dr. Cantilena:

The American College Health Association (ACHA) writes to express its strong support for granting over-the-counter status for the Plan B emergency contraceptive pill (ECP), and urges favorable action on the Plan B over-the-counter application in order to enhance college women's access to this therapy in the event of an emergency.

There are over 15.3 million college students in the United States with females comprising 56.1% of student enrollment.¹ They face many challenges during their postsecondary years, among them, the occurrence of unintentional pregnancy, which can either be a significant impediment to successful course work, cut short a student's academic pursuits, or lead to an abortion. According to self-reported data collected from over 106,000 students over seven survey periods of the ACHA National College Health Assessment (ACHA-NCHA), 2.5% of female students in Spring 2000 reported that they had experienced unintended pregnancy; in Spring 2003, the reported proportion dropped to 1.8%.² If this could be extrapolated to 8.6 million female college students, it would represent almost 155,000 cases of unintended pregnancies, an incidence that could be further reduced if ECPs were made widely available.

Approximately 1.3% of college women report the occurrence of an unintended pregnancy as a cause of an academic problem such as receiving a lower grade on an exam, project, or course, or causing them to receive an "Incomplete" or drop a course.² As an impediment to academic success, this too could be substantially reduced if college women could have accessible ECPs added to their contraception options.

Notwithstanding unintended pregnancy from consensual sexual behavior, sexual assault is unfortunately an issue that some college women encounter. Indeed, 1.7 to 2.6% of ACHA-NCHA female student respondents have reported experiencing sexual assault.² There can be life-altering effects for college women victimized in this way, including unintended pregnancy. Again, broadened access to ECPs will give college women a means to prevent pregnancy arising from such a crime.

Data suggest that use of ECPs by college women is growing. In Spring 2000, reported use was 4.7% of female respondents; in Spring 2003, reported ECP use was 7.0%.² Over-the counter access to ECPs would unburden the resource strained student health care system by not requiring these clinic visits to acquire prescriptions, particularly since ECP use has proven to be safe and effective,

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the Plan B label adequately explains potential adverse effects and conditions of use, there are few contraindications, and the side effects of ECPs are minor and temporary.

Improving access to and the availability of emergency contraception will help to advance an important public health goal of reducing unintended pregnancies, and college women are prime stakeholders in this important issue. We strongly urge that Plan B be granted over-the-counter status.

Sincerely,



Reginald Fennell, PhD, CHES
President
American College Health Association

cc: Mark B. McClellan, MD, PhD, Commissioner of Food and Drugs, United States Food and Drug Administration

¹U.S. Department of Education, National Center for Education Statistics. *Enrollment in Postsecondary Institutions, Fall 2000 and Financial Statistics, Fiscal Year 2000*, NCES 2002-212, Washington, DC: 2002.

²American College Health Association. *National College Health Assessment: Reference Group Database Spring 2000-Spring 2003 Semi-Annual Assessment*. Baltimore: American College Health Association; 2003.