



July 30, 2018

Diane Foley, M.D., FAAP
Deputy Assistant Secretary for Population Affairs
Office of the Assistant Secretary for Health
Office of Population Affairs
US Department of Health and Human Services
Attention: Family Planning
Hubert H. Humphrey Building, Room 716G
200 Independence Avenue SW
Washington, DC 20201

Dear Dr. Foley:

The National Consumers League (NCL) appreciates the opportunity to submit these comments to the US Department of Health and Human Services' (HHS) notice of proposed rulemaking under the "Compliance with Statutory Program Requirements," RIN 0937-ZA00.

The National Consumers League is America's pioneer consumer organization. Founded in 1899, NCL has a 119 year history of working to promote women's health and well being, including access to reproductive health care.

NCL strongly opposes the Trump Administration's proposed rule governing the Title X program. Title X centers have helped to prevent one million unintended pregnancies each year. Unwanted pregnancies are, in fact, at an all-time low. This is a victory for those opposed to abortion services and should have their full support.

The Title X program is integral in ensuring that health care is provided to women and teenagers across the United States. Since implementing Title X in 1980, more than 4 million people each year have relied on the health care centers established by this program. Title X health care centers provide a wide range of reproductive and preventive health care services, such as wellness exams, birth control, contraception education and lifesaving cervical and breast cancer screenings. In 2016, health care centers utilized Title X funding to provide 720,000 Pap tests, 4 million STI tests and nearly one million breast exams.

NCL is very concerned about the effect that this proposed rule could have on patients in regions of the United States with limited access to health care, as well as economically distressed adults and teenagers without health insurance. The

proposed rule could have detrimental effects on patient education about reproductive health care options. The proposed change to Title X would seriously restrict the ability of clinicians to explain contraceptive and reproductive health care options to their patients.

The proposed changes to Title X also undermine the original mission of the program to increase access to family planning and sexual health care services. **NCL believes it is crucial for HHS to do a comprehensive analysis of the proposed rule to see how the proposed changes will affect these already underserved patients.**

If implemented, these rules could result in 40% of patients losing their health care services completely. This means reversing many positive trends emerging over the past few decades, including low rates of unintended teenage pregnancy.

NCL believes that sweeping changes to health care programs, such as Title X, must be carefully considered and reviewed and must align with the mission of increased access to safe and affordable care. **HHS has not, in our view, analyzed all the possible effects that this proposed rule could have on vulnerable populations in the United States or the agency would not be moving forward with these misguided rules.**

This proposed rule is harmful to the millions of women and teens who rely on Title X providers for their health care. This rule would also have the perverse effect of discouraging physicians from participating and educating patients about Title X services. NCL has long been committed to promoting safe and readily accessible reproductive health care and education to women and teens.

Sincerely,

Sally Greenberg
Executive Director
National Consumers League