

July 30, 2018

The Honorable Alex Azar
Secretary
U.S. Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue SW
Washington, DC 20201

Attention: Compliance With Statutory Program Integrity Requirements (Family Planning)

Dear Secretary Azar:

The Patient-Centered Primary Care Collaborative (PCPCC) appreciates this opportunity to provide comment on the administration proposal to revise regulations pertaining to Title X of the Public Health Service Act. PCPCC would like to express concern over potential health outcomes of the proposed rule, particularly on lower-income and medically underserved patients. PCPCC believes that the exclusion of health clinics providing a full range of family planning services from Title X would undermine our nation's public health and weaken an important component of America's primary care delivery system.

Title X is the only federal program exclusively dedicated to providing low-income and adolescent patients with essential family planning and preventive health services and information. Evidence-based sexuality education programs help young women achieve their educational and professional goals by educating them about sexual health, including preventing unintended pregnancy and family planning. These and other federal programs must continue to provide non-directive, comprehensive, medically accurate information.

As noted by a recent article in Health Affairs, "the rule is likely to have a major, harmful, and lasting impact on access to family planning, which is recognized by the Centers for Disease Control and Prevention (CDC) as one of the 10 most important public health advances of the twentieth century."¹ It also cites analyses indicating that the change could lead to a resulting surge in demand on community health centers and public health agencies – a strain that would undermine other important primary care and public health goals.

PCPCC strongly believes that clinicians providing critical primary care services should be guided by evidence-based best practices that are tailored to the needs of the patient. Trust is an essential component of this patient-provider relationship. This trust would be drastically

¹ "The Title X Family Planning Proposed Rule: What's At Stake For Community Health Centers?," Health Affairs Blog, June 25, 2018. DOI: 10.1377/hblog20180621.675764

undermined by real or perceived restrictions on what the clinician can discuss or recommend for the patient. PCPCC strongly encourages the Department of Health and Human Services (HHS) to review the principles issued by the American Academy of Family Physicians (AAFP), American Academy of Pediatrics (AAP), American College of Obstetricians and Gynecologists (ACOG) and American College of Physicians (ACP) on "Protecting the Patient-Physician Relationship: Keeping External Interference Out of the Practice of Medicine." These principles call on policymakers to:

*"Reject government restrictions on the information our patients can receive from their doctors. Patients expect medically accurate, comprehensive information from their physicians; this dialogue is critical to ensuring the integrity of the patient-physician relationship. No governmental body should interfere in our members' obligation to provide evidence-based information to their patients. When our government restricts the information that can be given to women, or forces physicians to provide women with non-medically inaccurate information, we can expect increased rates of unplanned pregnancy, pregnancy complications, and undiagnosed medical conditions."*²

Founded in 2006, the Patient-Centered Primary Care Collaborative is a not-for-profit multi-stakeholder membership organization dedicated to advancing an effective and efficient health system built on a strong foundation of primary care and the patient-centered medical home. Representing a broad group of public and private organizations – including payers, healthcare clinicians and other providers, leading corporations and patient and consumer advocacy groups – the PCPCC's mission is to unify and engage diverse stakeholders in promoting policies and sharing best practices that support growth of high-performing primary care to achieve the "Quadruple Aim": better care, better health, lower costs, and greater joy for clinicians and staff in delivery of care.

Thank you for requesting input on the proposal to revise regulations pertaining to Title X of the Public Health Service Act. PCPCC and its members look forward to a final rule that recognizes and supports the critical role of family planning services under Title X in providing access to comprehensive primary care to all Americans.

Sincerely,



Ann Greiner
President & CEO

² "Joint Principles for Protecting the Patient-Physician Relationship" <https://www.acponline.org/acp-newsroom/joint-principles-for-protecting-the-patient-physician-relationship>