



Comments on HHS Proposed Restrictions to Title X July 31, 2018

UPIC Health, LLC joins the public health community in asking HHS and the OPA to stop the harmful, biased and political revisions proposed for the longstanding Title X of the Public Health Service Act. As an outsourcer to many Title X recipient clients across 15 states, we process more than 120,000 calls per month from all genders and age brackets. In our four-year tenure, we've processed more than 1 million calls from patients looking for a spectrum of information and reproductive healthcare.

Through our partnerships and vast experience, we know that many providers already follow the rules already set forth in Title X and to change them in the way proposed would harm patients that our clients serve every single day. This harm will come in many forms. But from our perspective it will mean administrative blockages and additional logistical and financial challenges for patients who often are already underserved and disadvantaged, that they cannot afford. It is inhumane, biased and sexist to hinder access to healthcare, especially for the underserved, as suggested in the proposal.

These patients have a right to receive information and services without discrimination or interruption from the Federal Government by withholding taxpayer dollars from these programs. In fact, a July 2018 poll from [Quinnipiac](#) found that 60% of men and 65% of women support Roe V. Wade. So yes, funding providers IS acceptable! But we just are asking for no Gag Rule and unhindered access to information and services patients want and need.

It is time that our nation start trusting women in the choices they make for their own bodies and family planning. One cannot "separate" reproductive health information and services, which include cancer screenings, STD testing & treatment, and other preventative services from the full spectrum family planning services and information.

The Title X family planning program supports a network of health care providers that ensures access to contraception, cancer screenings, STD testing and treatment, and other preventive services for 4 million people every year. It sets the gold standard for high-quality, patient-centered family planning care. The proposed changes would fundamentally overhaul Title X in ways that would seriously harm providers' capacity to serve the poor and low-income patients who rely on them.

The points below are from the National Family Planning and Reproductive Health Association and we agree with every one of them:



- For nearly 50 years, a guiding tenet of Title X has been that patients' values and unique health needs should guide all decisions in a family planning visit; however, this rule intends to upend that.
- This rule would erode standards of care that are a hallmark of the existing Title X network. It would allow providers to avoid offering a broad range of contraceptive methods and would shift the focus of the program away from its core identity as an affordable birth control and related preventive care program.
- Critical especially for minors, the rule would undermine fundamental patient confidentiality protections, which could cause many patients to avoid seeking care and damage the strength of the provider-patient relationship.
- The proposal would also revive a "gag rule" on health providers, which would let politicians define what's appropriate for clinicians and other health professionals to share with patients in order to push an ideological agenda
- The proposed rule would prohibit providers from referring patients for abortion care, even upon a patient's request, and appears to make sharing any information about abortion impossible or nearly so.
- Shifting the Title X program away from its original mission and intent would force long-standing expert providers out of the program, force health centers to close and leave people without any access to care, resulting in increased rates of unintended pregnancies, STDs and unsafe abortions.

We demand these proposed changes be scrapped for all the reason set forth above.

Sincerely,

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