

HCP Comments on Title X Gag Rule

Health Center Partners of Southern California represents 17 primary health care organizations providing comprehensive care to nearly one million patients in San Diego, Riverside and Imperial counties. Combined, these organizations employ more than 500 physicians. **We write today, on behalf of the network and those physicians, in opposition to the proposed rule governing Title X funds.**

We oppose the rule because we believe the additional restrictions are unnecessary. Under current law, funds for Title X cannot be used to provide or promote abortion as a method of family planning. Community health centers are key participants in the Title X program, with nearly ¼ of all Title X delivery sites located within a federally qualified health center. **The proposed rule would require health centers to provide additional, and burdensome reports including detailed information on community partners and referral agencies in addition to disclosing protected health information about minor patients.**

While we understand the government's intention to clearly demonstrate that federal funds are not used for abortion services, we believe that this rule will have implications well beyond the clear use of funds. It is our opinion that the proposed rule would have a negative impact on patients, and our community, for the following reasons:

1. **It would impact providers' ability to give comprehensive medical information to their patients.**
2. **It could cause irreparable harm to the patient/doctor relationship if the patient learns that their physician purposefully withheld information from them. This could negatively impact trust, treatment compliance and, ultimately, a patient's health.**
3. **Withholding information from patients is counter to our patient-centered, quality focused model of care.**
4. **The proposed rule would significantly alter and decrease the Title X network, exacerbating barriers to access already faced by the Title X population, and weaken clinical standards of family planning care provided by these providers.**

The proposed regulation would disqualify Planned Parenthood centers that participate in the Title X program outright, although 69% of Title X recipients seek care at Planned Parenthood. It is not feasible that health centers would be able to offer similarly comprehensive family planning services due to challenges with workforce and facility space.

Lastly, we have sincere concern with the changes in the definition of "low income" as submitted in the proposed regulation. Historically, low-income has referred to people at or below 200% of the federal poverty level. This is consistent with the low-income definition use to set criteria for the sliding fee scale within the health center setting. **Allowing the program to expand to include women with employer-sponsored insurance (regardless of income) because the employers have a religious or moral objection to offering contraceptive services will expand the patients served by Title X without providing any additional funding to handle the increased need, creating additional access issues for eligible families.**

We encourage HHS to reject this proposed change, and seek a less burdensome, more patient-centered method to protect the use of federal funds.

Respectfully submitted –

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Health Center Partners of Southern California
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