

National Organization for Women

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Secretary Kathleen Sebelius
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Sebelius,

On behalf of the National Organization for Women's 350 chapters and hundreds of thousands of our members and supporters, I am writing you to urge adoption of all recommendations made by the Institute of Medicine (IOM) concerning preventive health care services for women. Each of the recommendations is important and necessary for the expansion of access to care and the improvement of health status for women, especially those of child-bearing age.

Our organization was greatly encouraged to hear that the IOM had recommended inclusion of the full range of Food and Drug Administration-approved contraceptive methods, sterilization procedures, and patient education and counseling for women with reproductive capacity in the package of preventive services to be provided without co-payment. Affordable access to contraceptives has long been an important policy objective for our activists who are motivated by the knowledge that access to reproductive health care, including abortion care, has been severely restricted. We are convinced that unimpeded access to contraception will reduce the need for abortion care and improve outcomes for women by reducing the incidence of short birth intervals.

We believe that if the Department of Health and Human Services fully embraces this recommendation that significant progress will be made towards reducing health disparities affecting racial and ethnic minorities, expanding access for young women and those with moderate incomes as well as generally improving the health status of women and their infants. It should not be overlooked that the educational and economic opportunities for women will be dramatically improved when they are able to successfully plan for the number and timing of their children.

We are asking the Department in implementing the IOM recommendations that it makes every effort to minimize the imposition of refusal or conscience clauses. As you may know, the Patient Protection and Affordable Care Act (ACA) allows refusals for abortion care for Qualified Health Plans (QHPs) and does not explicitly authorize refusals to provide coverage for other services. Recent studies have shown how an increasing number of health care refusals are undermining medical standards of care and patient health and safety. Allowance of refusal clauses will override the intent and application of the Women's Health Amendment and the evidence-based standards of practice reflected

in the IOM recommendations. As we have seen in numerous documented cases, women's health and well-being are frequently endangered by refusal clauses. It will be essential that the Department assures that all plans sold in the ACA Exchanges contract with a range of providers so that the full complement of women's preventive health services are available to every woman.

We agree with others who have written the Secretary that contraceptive coverage must include all FDA-approved drugs, devices and supplies so that each woman has access to the most effective method for her health and personal needs. Additionally, we support the suggestion that HHS educate providers about the importance of coverage standards under the Women's Preventive Services package in order to assure that services are readily made available to patients.

We commend the IOM's additional recommendations and urge full implementation for:

- Screening for gestational diabetes;
- Provision of high-risk human papillomavirus (HPV) DNA testing;
- Annual counseling on sexually-transmitted disease information for sexually active women;
- Counseling and screening for human immunodeficiency virus infections;
- Comprehensive lactation support and counseling and costs of renting breastfeeding equipment;
- Screening and counseling for interpersonal and domestic violence; and,
- Provision of at least one annual well-woman preventive care visit.

The National Organization for Women looks forward to working with the Department as it proceeds with the development of regulations, guidance documents and standards for women's preventive health services.

Sincerely,



Terry O'Neill

CC:

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