



The Colorado
Health Foundation™

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www.coloradohealth.org

July 27, 2018

Office of the Assistant Secretary for Health, Office of Population Affairs
Attention: Family Planning
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 716G
200 Independence Avenue SW, Washington, DC 20201

RE: Public Comment in Response to the Proposed Regulation, Compliance With Statutory Program Integrity Requirements (Proposed Rule 83 FR 25502)

Dear Assistant Secretary Giroir, M.D.,

Thank you for the opportunity to provide comments on this proposed regulation concerning changes to Title X regulations of the Public Health Service Act. The Colorado Health Foundation is the state's largest private foundation and the third largest health foundation in the nation. We work closely with partners in the private, public, and nonprofit sectors to bring health within reach for all Coloradans.

We strongly oppose the Office of Population Affairs' proposed changes to Title X regulations. We believe they would significantly infringe on Coloradans' ability to access comprehensive primary care, which include family planning services, to adequately plan for the future, and to get new and growing families off to their best possible start. Specifically, we are concerned that if these proposed rules are enacted, they would create new barriers for low income populations and decreased access to, and quality of, primary care in rural communities.

One of the cornerstones of The Colorado Health Foundation's work includes serving Coloradans who are low income. We believe that the proposed Title X regulatory changes would disproportionately impact women and families with low income who seek out family planning services and other comprehensive primary care services here in Colorado and elsewhere. This is especially true given that the proposed regulation could drastically reduce access to long-acting contraceptive methods, which could increase the number of unintended pregnancies. Colorado's policymakers and health community have worked together in recent years to achieve significant reductions in such unintended pregnancies. In large part, this progress has been achieved because of greater access to, and availability of, contraceptive methods like IUDs for young women and low income populations. In our most recent Colorado Health Report Card, we saw a 46.5% decrease in the teen birth rate from 2006 to 2013.





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We also firmly believe that community needs must be reflected in the way Title X rules are promulgated. We support an equitable approach to family planning services and access to primary care, especially for populations that live in rural communities. Restricting comprehensive family planning and primary care services in the rural communities of Colorado and other states would place a significant burden on access to contraceptive methods that are currently available under Title X rules for rural communities, in particular reducing low-cost family planning options nearby.

Thank you for the opportunity to provide input to this proposed rule change. If you have any questions, or seek clarification, please contact Jin Alexander Tsuchiya, public policy officer at the Colorado Health Foundation, at jtsuchiya@coloradohealth.org, or (303) 953-3667.

Sincerely,

Kyle Legleiter
Senior Director of Policy and Advocacy
The Colorado Health Foundation

