



July 25, 2018

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

RE: Proposed Update to Title X Family Planning Grant Program (RIN: 0937-ZA00)

Dear Secretary Azar:

On behalf of the more than 123,000 PAs (physician assistants) throughout the United States, the American Academy of PAs (AAPA) welcomes the opportunity to submit comments to the Department of Health and Human Services (HHS) regarding the recently proposed rule to revise regulations governing Title X of the Public Health Service Act (Title X).

In the proposed rule, the changes put forward by the Office of Population Affairs (OPA) would block the availability of federal funds to family planning providers that also offer abortion services; curtail counseling and referrals to abortion services by Title X funded providers; eliminate current requirements that Title X sites offer a broad range of medically approved family planning methods and non-directive pregnancy options counseling that includes information about prenatal care/delivery, adoption, and abortion; and direct new funds to faith-based and other organizations that promote fertility awareness and abstinence as methods of family planning.

AAPA is concerned that the proposal's new restrictions on Title X grant recipients will significantly reduce access to women's healthcare services, especially for those who are low-income or who live in rural or medically underserved areas. It is also likely that many current Title X grant recipients that do not provide abortion services will decide not to participate in the program if the proposed rule is implemented because of concerns about clinical standards of care, medical liability, and burdensome administrative requirements.

PA Practice

PAs are medical professionals who manage the full scope of patient care, often serving patients with multiple comorbidities. They conduct physical exams, order and interpret tests, diagnose and treat illnesses, develop and manage treatment plans, prescribe medications, assist in surgery, and counsel patients on preventative healthcare, and often serve as a patient's principal healthcare professional. PAs are one of three categories of healthcare professionals, including physicians and nurse practitioners,

who are authorized by law to provide primary care in the United States. In addition to primary care, PAs practice in a wide range of settings and medical specialties, improving healthcare access and quality.

AAPA Policy on Reproductive Decision Making

According to the Guidelines for Ethical Conduct for the PA profession, the foremost value of the PA profession is respect for the health, safety, welfare, and dignity of all human beings, which requires PAs to always act in the best interest of their patients. This concept is the foundation of the patient–PA relationship and underpins a PA's obligation to ensure each of their patients receives appropriate care. AAPA believes appropriate care encompasses women having access to family planning and reproductive healthcare services. PAs must be able to present patients with all of the information necessary for them to make informed decisions and be able to provide referrals for patients that are necessary for them to receive appropriate care that is desired by their patients.

AAPA's policy on reproductive decision making states "Patients have a right to access the full range of reproductive healthcare services, including fertility treatments, contraception, sterilization, and abortion. PAs have an ethical obligation to provide balanced and unbiased clinical information about reproductive healthcare."

AAPA View and Recommendations

AAPA has significant concerns about the proposed regulatory changes because of the potential for restricting women's access to care and services that are both legal and medically important. We would also urge the administration to be cognizant of how new funding restrictions for Title X recipients could create barriers to women accessing critical healthcare services. Doing what is best for the patient must continue to be of utmost concern.

In promulgating the final rule and undertaking new initiatives, AAPA urges the department to listen to the needs of patients and to work with all relevant healthcare provider groups to ensure any actions are supported by and consistent with best healthcare practices, and that every patient has access to appropriate care, including important preventative services.

AAPA looks forward to working with HHS and all relevant parties moving forward. Please do not hesitate to contact Tate Heuer, AAPA Vice President, Federal Advocacy, at 571-319-4338 or theuer@aapa.org, with any questions.

Sincerely,

A handwritten signature in black ink that reads "Jonathan E. Sobel". The signature is written in a cursive, flowing style.

Jonathan E. Sobel, MBA, PA-C, DFAAPA, FAPACVS
President and Chair of the Board