



July 30, 2018

**Re: Opposition to proposed rule change to Title X (HHS-OS-2018-0008)**

Dear Health and Human Services Secretary Azar,

On behalf of the Ohio Women's Public Policy Network, I am writing to express our opposition to the recently proposed rule change to Title X providers (**HHS-OS-2018-0008, Proposed Rule for Compliance With Statutory Program Integrity Requirements**).

As a statewide coalition of more than 25 organizations, we work collaboratively to advance policies at the local, state, and federal level that promote economic security for women and strengthen families. The Title X rule change stands in direct opposition to our mission of creating a policy landscape that promotes economically secure, healthy, thriving women. If enacted, it would have far-reaching implications for the women and girls we represent in communities across the state of Ohio, as well as our state's economy as a whole.

Title X serves more than four million people each year – and often, the patients relying on the program are low-income women who would otherwise not have access to insurance coverage to access the care they need. The rule would create unnecessary barriers that are designed to make it impossible for reproductive health care providers like Planned Parenthood to serve their patients, thus preventing the tens of thousands of Ohioans who depend on Title X to receive critical reproductive health care services, such as birth control, wellness exams, STI testing, and cancer screenings.

Last year, 87 health facilities in the state of Ohio [received \\$8.7 million in Title X federal funding](#), serving 94,000 patients in total – the vast majority of which were women. The rule change would be particularly devastating to nine counties in the state (Athens, Lucas, Mahoning, Medina, Portage, Richland, Summit, Trumbull, and Wayne counties) where Planned Parenthood is the only Title X family planning provider. If the rule change is enacted, the women in these counties may be left without a single provider in their local community.

The rule change would prevent Title X health care provider from referring patients for abortion and it would prohibit health care professionals from offering any information regarding abortion – even if the patient expresses that this is what they want, and even if withholding this information would have a detrimental impact on the patient's health. This rule would deny patients' right to comprehensive, medically accurate information; it would prevent medical professionals from performing their jobs; and it would threaten the relationship and trust between doctors and patients.

Defunding Title X-funded clinics would not only eviscerate affordable access to reproductive health care services for tens of thousands of Ohio women, but it would also have a detrimental effect on women's economic potential. There is a well-established connection between women's reproductive access and economic security, which cannot be separated or ignored during the implementation of health care policies. Access to affordable contraception is essential in determining educational attainment and earning potential for women, especially for women of color who already face far greater impediments to accessing reproductive health care.

In conclusion, the rule changes proposed to Title X would have devastating impacts on women's health and well-being, the economic security of them and their families, and their ability to pursue educational and employment opportunities. It is a clear intrusion on a patient's access to health care, and the four million people who rely on Title X would be put at risk as a result.

We strongly urge you to reject the final rule.

Sincerely,



Erin Ryan  
Managing Director, The Ohio Women's Public Policy Network

**Members of the Women's Public Policy Network include the following organizations:**

ACLU of Ohio	Ohio Progressive Asian Women's Leadership
ACTION OHIO	Ohio Religious Coalition for Reproductive Choice (Ohio RCRC)
American Association of University Women, Ohio	Ohio Urban Resources Systems (O.U.R.S.)
Catholics for Choice	Planned Parenthood Advocates of Ohio
Children's Defense Fund – Ohio	Policy Matters Ohio
Closing the Women's Wealth Gap	ProgressOhio Education Fund
Hadassah Columbus	Restoring Our Own Through Transformation (ROOTT)
Innovation Ohio Education Fund	The Women's Fund of Central Ohio
Jobs with Justice, Cleveland Chapter	The Women's Fund of the Greater Cincinnati Foundation
NARAL Pro-Choice Ohio	URGE
National Coalition of 100 Black Women, Central Ohio Chapter	YWCA Columbus
National Council of Jewish Women, Cleveland Chapter	YWCA Greater Cincinnati
Ohio Alliance to End Sexual Violence	YWCA Dayton
Ohio Domestic Violence Network	
Ohio NOW	