

National Organization for Women Foundation

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Testimony of the National Organization for Women Foundation Terry O'Neill, President

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Committee on Preventative Services for Women
Institute of Medicine
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The National Organization for Women Foundation respectfully submits these comments in support of contraceptive services, comprehensive cervical cancer screening and breastfeeding supplies and devices as necessary preventive care in the Women's Health Amendment to the Patient Protection and Affordable Care Act [P.L. 111-148].

The National Organization for Women Foundation is the education and litigation arm of the National Organization for Women, the largest and oldest feminist activist organization in the United States. A primary concern of NOW and NOW Foundation is to take action to ensure reproductive rights for all women, including affordable and accessible family planning services.

This submission highlights what NOW Foundation has identified as areas that need to be included in the Institute of Medicine's development of recommended comprehensive guidelines for preventive services for women. These suggestions derive from NOW Foundation's long-standing advocacy for comprehensive reproductive healthcare for all women, as well as the work and research done by other women's health organizations and initiatives. The A and B grade preventive services identified by the U.S. Preventive Services Taskforce is a substantial start, but leaves out crucial health services for women without which their health and wellbeing can not be considered comprehensive.

We support the comments submitted by Guttmacher Institute, and wish to highlight some key points. On that track we want to address critical gaps in the package of preventive services currently required to be covered without cost-sharing by all new private health plans, specifically in the area of family planning. We urge this committee to recommend that the U.S. Department of Health and Human Services incorporate the full range of contraceptive drugs, devices, and procedures as part of the comprehensive package for women's preventive care, as well as the related clinical services necessary to appropriately supply and administer those methods.

Contraceptive services have long been recognized by governmental entities and pertinent private sector experts as a vital and effective component of preventive women's and public health, and are supported by a strong body of evidence. NOW Foundation supports Guttmacher Institute's statement that contraceptive use helps women avoid unintended pregnancy and improve birth-spacing, which in turn have substantial positive consequences for infants, women, families and societies. In the U.S., increased contraceptive use has paralleled substantial declines in

unintended pregnancy and abortion; thus reducing the instance of unintended pregnancies via contraception and limits the need for abortion services. A full 70 percent of women between the ages of 15 and 44 are sexually active and do not want to become pregnant, as documented by the Guttmacher Institute.

There is a strong link between lack of access to contraception and poverty. Without publicly-funded family planning services, which include easily accessible and affordable contraception, levels of unintended pregnancy and abortion would be nearly two-thirds higher among U.S. women overall, and close to double that among poor women. One study shows that if cost were no concern, many more women would choose a highly effective long-acting or permanent method of contraception that requires little or no daily involvement, and less frequent clinic visits. Cost concerns help to explain why low-income women have far higher rates of unintended pregnancies than do higher-income women. Contraception costs are an important barrier to effective use, especially for poor women. Having contraception included in the list of preventive services authorized by the Women's Health Amendment would help women overcome this significant obstacle.

In conclusion, the scientific and economic evidence of both public and private sector precedents indicates that incorporating comprehensive family planning into the guidelines for women's preventive care would greatly benefit women, families and society. This panel has every reason to recommend that the U.S. Department of Health and Human Services include coverage for the full range of permanent and reversible contraceptive drugs and services, including contraceptive counseling and education for patients. Doing so would prevent numerous unintended pregnancies thus reducing the need for abortion, increase birth-spacing, and lighten the financial burden on low-income women and families to receive what should be considered commonplace, but necessary, healthcare.

NOW Foundation also urges the IOM committee to include cervical cancer screening and breastfeeding supplies and devices in the current list of preventive services under the Affordable Care Act. Specifically, adding coverage without cost-sharing of HPV testing for women 30 and over would reduce cost barriers to screening for older women, which is the group most at risk for cervical cancer. Additionally, studies have shown that breastfeeding provides vital long-term benefits for mother and child, yet the cost of supplies like breast pumps are often a barrier for women to continue breast feeding after they return to work. To address this need, we suggest that the IOM recommend coverage without cost-sharing for breastfeeding supplies and devices.

Sources:

Guttmacher Policy Review, Winter 2011, Volume 14, Number 1, "The Case for Insurance Coverage of Contraceptive Services and Supplies Without Cost-Sharing"

Guttmacher Institute, Facts On Contraceptive Use in the United States,
http://www.guttmacher.org/pubs/fb_contr_use.html

U.S. Preventive Services Task Force, USPSTF A and B Recommendations,
www.uspreventiveservicestaskforce.org/uspstf/uspsabrecs.htm

The National Academies, Current Projects, "Preventive Services for Women",
<http://www8.nationalacademies.org/cp/projectview.aspx?key=IOM-BPH-10-13>

HealthCare.gov, Preventive Services Covered under the Affordable Care Act,
<http://www.healthcare.gov/law/about/provisions/services/lists.html>