

**From:** [Patty Begley](#)  
**To:** [E-OHPSCA2713.EBSA](#)  
**Subject:** proposed rules regarding Explanation of Benefits  
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I am writing regarding Section 2713 of the affordable Care Act, which requires health plans offering health insurance to provide coverage for clinical preventive services ( currently some plans require symptoms before chlamydia testing is covered). In addition, the provisions prohibit cost sharing requirements for preventive services, including immunizations, STD screening and counseling, Pap smears, and HPV immunizations.

As drafted, this rule would require insurance plans to report the medical care provided to adolescents covered by the plan. While I applaud the increased focus and support for preventive services, I am concerned that the rule, as written, would create a breach of confidentiality that would prevent adolescents from seeking STD treatment, family planning services, and other preventive care. Indeed, the rule contradicts existing HHS regulations regarding Title X Family Planning Services, which requires that confidential services be offered to adolescents.

I am assuming that the proposed rule was not designed to create barriers for adolescents and that it can be amended to protect the confidentiality of adolescents seeking these important health services.

Thank you for the opportunity to comment on the proposed rule.

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