

From: [Amy Sylvia](#)
To: [E-OHPSCA2713.EBSA](#)
Subject: Proposed Rules regarding Explanantion of Benefits
Date: Friday, September 17, 2010 10:38:50 AM

To Whom It May Concern;

I am writing with regard to Section 2713 of the Affordable Care Act, which requires health plans offering group or individual health insurance to provide coverage for clinical preventive services (currently some plans cover Chlamydia testing only when a patient has symptoms when the majority of women with Chlamydia have no symptoms). In addition, the provisions prohibit cost sharing requirements, such as co-payments or deductibles, for preventive care. The preventive care covered in the law includes clinical services graded A or B by the U.S. Preventative Services Task Force, immunizations recommended by ACIP, services recommended for children and teens in Bright Futures, and additional services to be specified by HRSA. STD screening and counseling, Pap smears, and HPV immunizations are included in these recommendations.

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 preventative services, my concern as a provider of adolescent reproductive health services, is that the rule, as written, would create a breach of confidentiality that would seriously deter or prevent adolescents from seeking STD treatment, family planning services, and other preventative care. Indeed, the rule contradicts existing HHS regulations regarding Title X Family Planning Services, which require that confidential services be offered to adolescents.

I am assuming that the proposed rule was not designed to create barriers to much needed services for adolescents, and that it can be amended to protect the confidentiality of adolescents seeking these important health services. Adolescents will not seek STD screening or birth control unless they are assured of confidential services. This could have disastrous effects on the lives of our young people.

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

Amy Sylvia
Program Director
Plymouth Family Planning
A program of Health Imperatives
Phone: 508.746.8353
Fax: 508.747.5501
asylvia@healthimperatives.org
healthimperatives.org