



King County

July 31, 2018

Senior Policy Advisor Valerie Huber
Office of the Assistant Secretary for Health
Office of Population Affairs

U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 716G
200 Independence Avenue SW
Washington, DC 20201

Attention: Family Planning

Dear Ms. Huber:

We urge you, in the strongest possible terms, not to proceed with the proposed rule, “Compliance with Statutory Program Integrity Requirements” re. Title X of the U.S. Public Health Service Act.

As leaders of Dr. Martin Luther King County, Washington, we believe the proposal would be nothing short of disastrous for the overall local health system and particularly harmful to women in need of financial support for family planning services.

The proposal threatens a system of Title X clinics in King County that has enabled us to lower the teen birth rate 60% below the national rate (.008 vs .020). Title X supports:

- 17 Family Planning clinics operated by three agencies: Public Health—Seattle & King County; Planned Parenthood of the Great Northwest and Hawaiian Islands (PPGNHI); and Cedar River Clinics; and
- More than 21,000 clients (in 2017) served by these providers, over half of whom are below the Federal Poverty Level.

More than two-thirds of those clients depend on services from Planned Parenthood, the largest Title X provider in King County. By imposing impossibly onerous restrictions on organizations that provide abortions, this aspect alone would cut family planning services for more than 16,000 women in our county.

We highlight three broad concerns that we believe can only be addressed by withdrawing the rule. Please support us in preventing these outcomes:

- **Creating a two-tier health care system** for women and teens. Lower income women and teens who rely on Title X services would be offered substandard care, because Title X providers would no longer offer the full range of: contraceptive methods, factual health care information, and referrals about pregnancy options. Women with higher incomes (who can access services outside of Title X clinics) would be offered a wider and more comprehensive range of services.

- **Medical professionals prohibited from speaking about certain health care options** that are legal and otherwise available. This censorship puts our medical providers in an impossible situation – having to withhold medical advice from a patient who needs that advice, or risk losing an entire source of funding. That’s why medical societies ranging from the American Medical Association to the American College of Obstetrics and Gynecology strenuously object to this proposed rule.
- **Requiring physical separation** for entities that also provide abortions, along with creating vague/confusing standards that prohibit more than a dozen activities associated with abortion. This would force two of our key Title X providers to face funding cuts and to reduce their preventive family planning services for lower income women and teens. This alone would mean a 75% reduction in these safety-net services.

Approximately a quarter of the women in King County are in need of publicly-funded contraception. Title X is their lifeline to health care that has lifelong benefits, giving women the opportunity to pursue their education and career goals.

The proposed rule threatens the incredible successes in King County and other communities, from the historically low teen birth rate to an overall unintended pregnancy rate that continues to decline. Family planning is well known as one of the 10 most important public health advances of the 20th century – and the proposed rule threatens to reverse the advances and create one of the worst public health disasters of the 21st century.
Thank you for your consideration of these comments.

Sincerely,



Dow Constantine
King County Executive



Joe McDermott, Council Chair
Metropolitan King County Council



Rod Dembowski, Chair
King County Board of Health

CC:

Patty Hayes, Director, Public Health – Seattle & King County
Mac Nicholson, Director of Government Relations, Metropolitan King County Council
April Putney, Director Government Relations, Office of King County Executive