



new hampshire  
**WOMEN'S FOUNDATION**

July 30, 2018

Office of the Assistant Secretary for Health, Office of Population Affairs  
Attention: Family Planning, U.S. Department of Health and Human Services  
Hubert H. Humphrey Building, Room 716G  
200 Independence Avenue SW  
Washington, DC 20201

RE: Docket No. HHS-OS-2018-0008

***Via Electronic Submission Only***

To Whom It May Concern:

The New Hampshire Women's Foundation invests in opportunity for New Hampshire women and girls. Through our research, education, advocacy, grantmaking, and philanthropy programs, we advance gender equality for all Granite Staters. The New Hampshire Women's Foundation was created by the merger of several partners: the Women's Fund of New Hampshire, the New Hampshire Women's Initiative, the New Hampshire Women's Policy Institute, the New Hampshire Women's Lobby and Alliance, and the New Hampshire Commission on the Status of Women. Together these organizations have a century's worth of shared history as leading voices for New Hampshire women and girls and gender equality.

The New Hampshire Women's Foundation strongly opposes the proposed amendments to 42 CFR Part 59, Compliance with Statutory Program Integrity Requirements. We are terribly disappointed that the Title X program, which is nearly 50 years old and has long enjoyed bipartisan support, is facing attacks that will undermine health care for millions of Americans. These attacks will get in the way of essential preventive health care such as birth control, cancer screenings, sexually transmitted infection testing and treatment, and annual exams.

The proposed amendments to 42 CFR Part 59 would make it impossible for women to obtain essential preventive health care services under Title X from health care providers that provide abortion services, offer referrals for abortion services, or *even mention abortion as an option* for a patient. Under the proposed amendments to 42 CFR Part 59, providers like Planned Parenthood will lose Title X funding unless they enforce this "gag rule." Here in New Hampshire, more than 18,000 people receive health care through Title X, and over 11,000 of them receive care from Planned Parenthood. The effect of these proposed amendments is simple: drastically reduced access to lifesaving health care and alarming interference in the relationship between patients and their doctors.

In 2018, one focus here at the New Hampshire Women's Foundation has been increasing access to prescription birth control. Modern prescription birth control was one of the greatest public health achievements of the 20<sup>th</sup> century. In addition to promoting maternal and child health, family planning based on prescription birth control has been transformational for women's educational opportunities and economic success. The number of women who finish college today is a staggering six times what it was before the legalization of birth control; today women earn half of all doctoral, medical, and law degrees. Access to prescription birth control is also a major driver of women's increased earnings, having helped shrink the "wage gap" between working men and women. Today women are the primary breadwinners in more than 40 percent of American households with children. The proposed amendments to 42 CFR Part 59 will make it harder for women to access prescription birth control and harder for New Hampshire to maintain its historically low rates of teen pregnancy and unintended pregnancy.

The proposed amendments to 42 CFR Part 59 will erect barriers between 18,000 Granite Staters and essential preventive health care. That is an intolerable outcome. The New Hampshire Women's Foundation requests that the Department of Health and Human Services withdraw the proposed amendments.

Very truly yours,

Sarah Mattson Dustin  
Policy Director