

January 8, 2019



Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8016
Baltimore, MD 21244-8010

Dear Health and Human Services Secretary Alex M. Azar II and Centers for Medicare & Medicaid Services Administrator Seema Verma,

Re: CMS-9922-P Comments in Response to the Proposed Changes to Exchange Program Integrity

The American Medical Student Association (AMSA) is the oldest and largest independent association of physicians-in-training in the United States. AMSA is a student-governed, non-profit organization representing nearly 30,000 medical trainees. Our organization is committed to advocating for quality and affordable healthcare for all, and building the next generation of physician leaders.

AMSA firmly opposes the current administration's proposed changes to the Affordable Care Act Exchange Program regarding coverage and billing for abortion care services. The current administration proposes requiring all insurers in the ACA marketplace to send and collect separate monthly bills to patients for coverage of abortion care services. The consequences of such a rule are dangerous for the health and wellbeing of women and families. AMSA has long asserted that women, regardless of age, social status, or marital status, should all have the right to obtain a legal, safe, voluntary abortion; and we oppose any restrictions on the availability of funds for family planning clinics that offer or provide counseling or referral for abortion services.

AMSA believes that comprehensive health insurance coverage includes primary care services, preventive services, reproductive health services including but not limited to prenatal and postnatal care, birth control, abortion counseling and services. Studies have shown that about half of all pregnancies in the United States are unintended.¹ Women may seek abortion services in cases of rape, incest, fetal anomalies that may prevent normal growth and survival out of the womb, or in clinical situations that pose a threat to maternal health.² Reproductive services are an essential part of women's basic healthcare needs. There is no justification for a separate monthly bill for such services. The current administration's proposed rule will not only impose additional barriers to abortion services, but it also stigmatizes women and their families for seeking such services. It will be a burden for patients and may dissuade women from seeking these services or delay necessary medical care which can result in more severe complications.

As future physicians, we will continue to oppose any restrictions on women's reproductive health and abortion coverage. Our entire training is focused on evidence-based medicine because this provides guidance and support for the best health outcomes. We must have policies in place that are in support of such clinical recommendations, not policies that create additional arbitrary and capricious barriers such as what this proposed rule would accomplish.

AMSA, therefore, urges you to reject this proposal. Please contact Perry Tsai, MD, PhD at pres@amsa.org for further information.

Sincerely,

American Medical Student Association

References

1. Declines in Unintended Pregnancy in the United States, 2008–2011 | NEJM.
<https://www.nejm.org/doi/full/10.1056/NEJMsa1506575>. Accessed January 8, 2019.
2. Rosenzweig C, 2018. Abortion Riders: Women Living in States with Insurance Restrictions Lack Abortion Coverage Options. *Henry J Kais Fam Found*. February 2018.
<https://www.kff.org/womens-health-policy/issue-brief/abortion-riders-women-living-in-states-with-insurance-restrictions-lack-abortion-coverage-options/>. Accessed January 8, 2019.