



April 20, 2016

Andy Slavitt, Acting Administrator
Centers for Medicare & Medicaid Services
200 Independence Ave., SW
Washington, DC 20201

Dear Administrator Slavitt,

On behalf of the American Academy of Family Physicians (AAFP), which represents 120,900 family physicians and medical students across the country, I write to request that the Centers for Medicare & Medicaid Services (CMS) review and revise, as necessary, its coverage of contraceptive options to include coverage of all Food and Drug Administration (FDA)-approved contraceptive options for men and women of reproductive age enrolled in Medicare and Medicaid. As described below, the AAFP believes there are benefits to having access to all FDA-approved contraceptive options for those who wish to use them.

Although the majority of Medicare beneficiaries are ages 65 and older, almost 920,000 women ages 18 to 44 received insurance coverage through Medicare in 2011.¹ Contraception is an often over-looked aspect of care for women with chronic conditions and disabilities. Among the 19.4 million women ages 15 and older with full Medicaid benefits in 2011, those in their reproductive years (ages 15 to 49) accounted for 70 percent of enrollment nationwide.² All Medicaid programs must cover family planning services and supplies without cost-sharing. However, since there is no federally defined standard for family planning, the range of contraceptive products and services that states cover varies by state and differs depending on how an individual qualifies for Medicaid. Much like how CMS is strengthening network adequacy standards within the Marketplace, it could improve contraceptive coverage for Medicaid patients by defining a standard applicable across all states.

The AAFP has a [policy](#) of supporting Medicare coverage for all FDA-approved methods of contraception and other policies in support of [reversible contraception methods](#), including [long-acting reversible contraceptives](#), and [over-the-counter oral contraceptives](#). While most men and women with private health insurance now have comprehensive coverage of contraception through the *Affordable Care Act*, without cost-sharing, men and women insured through public programs, like Medicare and Medicaid, do not benefit from the same coverage. Hence, these men and women are vulnerable to gaps in contraceptive coverage and/or shouldering higher out-of-pocket costs for birth control.

¹ Private and Public Coverage of Contraceptive Services and Supplies in the United States, Kaiser Family Foundation (07/10/15).

² Private and Public Coverage of Contraceptive Services and Supplies in the United States, Kaiser Family Foundation (07/10/15).

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Affordable access to all FDA-approved contraception options is still not within the reach of all men and women in the U.S. Therefore, we respectfully ask CMS to expand its coverage of contraceptive options to all FDA-approved contraceptive options for men and women of reproductive age, enrolled in Medicare and Medicaid.

Thank you for your time and consideration. If you or your staff have any questions about this matter or if we may further facilitate matters in this regard, please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Robert L. Wergin MD". The signature is written in a cursive style with a large initial "R" and "W".

Robert L. Wergin, MD, FAAFP
Board Chair