



**Sunset Advisory Commission Staff Report  
Health and Human Services Commission and System Issues  
Texas Women's Healthcare Coalition Comments  
October 17, 2014**

The Texas Women's Healthcare Coalition (TWHC) and its 45 healthcare, faith, and community-based member organizations are dedicated to improving the health and well-being of Texas women, babies, and families by assuring access to preventive healthcare for all Texas women. Access to preventive and preconception care— including health screenings and contraception—means healthy, planned pregnancies and early detection of cancers and other treatable conditions.

The Coalition respectfully offers the following preliminary recommendations concerning the proposal to consolidate the three streams of state funding for women's preventive healthcare in Texas, as presented under Issue 8 of the Sunset Advisory Commission Staff Report issued October 3, 2014.

**Change in Statute (8.1)**

*1) Client Eligibility*

- a. Income: Raise the cutoff for client eligibility to 250 percent of the federal poverty level, as in the DSHS Family Planning program currently. The financial implications of raising eligibility to this point would be minimal: as the report states, "most clients seeking services fall below 100 percent of the federal poverty level."
- b. Age and fertility: Expand eligibility to include women over 44 years of age who are not yet menopausal, as well as women who have been sterilized. Women in these categories need preventive healthcare services, such as clinical breast exams and screening for cervical cancer and sexually transmitted infections.
- c. Gender: Include services for men, as currently offered by the DSHS Family Planning program.

*2) Eligibility Determination and Enrollment Process*

- a. Point-of-service eligibility: Effective family planning and sexually transmitted infection control require availability of same-day services. Clinics need the capacity to determine a patient's eligibility upon arrival to provide efficient and effective care. Alternatively, clinics need support, such as presumptive eligibility, for the financial risk of treating a patient before eligibility has been confirmed. The suggested model provides neither.

*3) Covered Services*

- a. Benefits package: Comprehensive healthcare services for eligible patients, as currently provided in the Expanded Primary Care Program (including prenatal, medical, and dental) should be included in the new program, while ensuring that the level of funding for family planning services and the number of women receiving family planning services do not decrease from the current level. Providing preconception, interconception, and comprehensive healthcare services is consistent with the state's goals of improving birth outcomes and maternal health, as emphasized by state agencies and past legislative actions.

#### 4) *Billing Procedures and Funding Distribution*

- a. Fee-for-service model: Many clinics rely on cost reimbursement to remain viable. The model suggested in the report would result in many geographic areas having only one clinic able to receive cost reimbursement, which would not allow for sufficient provider capacity to meet the need for preventive care. Providers considered part of the “safety net” (such as Federally Qualified Health Centers and Title X providers) should receive cost reimbursement benefits.

#### 5) *Transition*

- a. Stakeholder involvement: The report recommends that HHSC “... keep providers and other stakeholders informed of the agency’s progress...” However, to ensure a workable system and to avoid losing much-needed providers in an already-damaged safety net, the process of consolidation must include substantial, meaningful, and ongoing stakeholder involvement from those “on the ground” – far more than is recommended in the report. Such involvement is an irreplaceable component of a successful transition.

### **Management Action (8.2)**

#### 1) *Transitioning New Mothers to New Women’s Health Program*

- a. Necessity of study: The feasibility and fiscal implications of automatically transitioning new mothers to publicly funded healthcare has been well-documented in other states. As such and in light of the delay and cost associated with studying such a program, the Commission should recommend the implementation of this program rather than its study.
- b. Authority to act: If study of the program is undertaken and it is determined to be feasible and cost-effective, state agencies should be empowered to implement the program as quickly as possible, rather than delaying a decision until the Legislature is again in session, as suggested in the report.

We look forward to the opportunity to discuss these preliminary concerns and others with you in detail. Thank you for your consideration, and for your strong support for women’s preventive healthcare. If you have any questions or if we can provide further information, please contact me at (210) 223-4589 or [JRealini@TexasWHC.org](mailto:JRealini@TexasWHC.org).

Respectfully submitted,



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**Steering Committee Members:**

Center for Public Policy Priorities  
District XI (Texas) American Congress of Obstetricians and Gynecologists  
Healthy Futures of Texas  
Methodist Healthcare Ministries  
Teaching Hospitals of Texas  
Texans Care for Children  
Texas Academy of Family Physicians  
Texas Association of Community Health Centers  
Texas Medical Association  
Women's Health and Family Planning Association of Texas

**Coalition Members:**

Amistad Community Health Center  
Austin Physicians for Social Responsibility  
AWHONN Texas  
Cardea  
Center for Community Health, UNTHSC  
Children's Hospital Association of Texas  
Coalition for Nurses in Advanced Practice  
Consortium of Texas Certified Nurse  
Department of Ob/Gyn of UNTHSC and the ForHER Institute  
Family Health Care, Inc.  
Gateway to Care  
Generation Covenant Healthcare  
Healthy Futures Alliance  
League of Women Voters of Texas  
Legacy Community Health Services  
Midwives University Health System  
National Council of Jewish Women—Texas State Policy Advocacy Network  
National Latina Institute for Reproductive Health  
People's Community Clinic  
Port Arthur Housing Authority  
SALVERE (Striving to Achieve Literacy via Education, Research, and Engagement)  
San Antonio Metro Health Clinic  
Schneider Communications  
South Texas Family Planning & Health Corp.  
St. David's Foundation  
Susan Wolfe and Associates  
Texas Association of Obstetricians and Gynecologists  
Texas Council on Family Violence  
Texas Health Institute  
Texas Hospital Association  
Texas Medical Association Alliance  
Texas Nurse Practitioners  
Texas Nurses Association  
Texas Pediatric Society  
Texas Unitarian Universalist Justice Ministry