



April 7, 2009

U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201  
By email: [proposedrescission@hhs.gov](mailto:proposedrescission@hhs.gov)  
[consciencecomment@hhs.gov](mailto:consciencecomment@hhs.gov)

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RE: RESCIND HHS REGULATIONS REGARDING HOSPITAL /  
OUTPATIENT AND COMMUNITY CLINIC SERVICES

To Whom It May Concern:

The Women's City Club of New York (WCC) strongly urges rescission of the HHS regulations regarding Hospital / Outpatient and Community Clinic Services that were established by the previous administration. We strongly opposed the regulations previously and continue to do so now. Founded in 1915, the WCC is a nonprofit, non-partisan multi-issue organization that advocates for public policies to improve the lives of New Yorkers. Since our early days, we have remained steadfast advocates in support of access to healthcare and the rights of women including reproductive justice.

As the regulations considered for rescission enable health care providers, insurers and health care institutions to refuse to provide health care services, as well as information and referrals to patients, they directly contradict the purpose of Health and Human Services which describes itself as "*the U.S. government's principal agency for protecting the health of all Americans and providing essential human services, especially for those who are least able to help themselves.*"

Legal and ethical principles of informed consent require health care providers to inform patients about all treatment options, including those to which the provider objects or those which s/he does not provide. Congress has long required federally funded health care providers in the Title X program to provide patients with counseling about all of their options, including abortion. The rescission of the Bush regulations would reinstate these essential safeguards.

Women - primarily low-income women - would once again have access to birth control and emergency contraception; New York State would have the ability to enforce our contraceptive equity law and would be able to give full-disclosure of family planning options. It is estimated that 1.4 million more unintended pregnancies - a 46% increase - would occur without the contraceptive services provided at publicly funded clinics.

The implementation of these rules on Hospital/Outpatient and Community Clinic Services has caused great harm to the millions of Americans who rely on public health care. They should be rescinded immediately.

Sincerely,

Ruth E. Acker  
President

Marjorie Ives  
Chair, Women's Issues Committee