



November 7, 2022

Texas Health and Human Services Commission
Via Email: PFDAcuteCare@hhs.texas.gov

Re:

The Texas Women's Healthcare Coalition (TWHC) and its 87 healthcare, faith, and community based member organizations are dedicated to improving the health and well-being of Texas women, babies, and families by ensuring access to preventive healthcare for all Texas women. Access to preventive and preconception care – including contraception – means healthy, planned pregnancies.

On behalf of the Texas Women's Healthcare Coalition, thank you for this opportunity to provide public comment on proposed Medicaid payment rates for Biennial Calendar Fee Reviews, Medical Policy Reviews, and Healthcare Common Procedure Coding System (HCPCS) Reviews.

Long acting reversible contraception (LARC), including implants such as the Nexplanon device, are supported by a wide body of research as being highly effective at reducing rates of unintended pregnancy¹, while also having high rates of user satisfaction². Though upfront cost is higher than short-acting methods such as oral contraceptive pills, LARC methods become cost neutral in public payer systems within 3 years of initiation when compared with use of short-acting methods³. Due to these factors, HHSC has worked tirelessly in recent years to make LARC methods more accessible to women who wish to use them.

However, rates for Nexplanon insertion and removal decreased significantly in 2017 and 2019, creating barriers to clinical access. In the Nov. 7 rate review, increases for codes 11981, 11982, and 11983 range from 0% to 1.69% and do not make up for prior decreases.

On behalf of our providers and the women they serve, the Texas Women's Healthcare Coalition strongly urges HHSC to revert these rates to their 2017 levels in order to facilitate access to the

¹<https://www.acog.org/clinical/clinical-guidance/practice-bulletin/articles/2017/11/long-acting-reversible-contraception-implants-and-intrauterine-devices>

² Ela, E. J., Broussard, K., Hansen, K., Burke, K. L., Thaxton, L., & Potter, J. E. (2022). Satisfaction, Resignation, and Dissatisfaction with Long-Acting Reversible Contraception among Low-Income Postpartum Texans. *Women's health issues : official publication of the Jacobs Institute of Women's Health*, 32(4), 334–342. <https://doi.org/10.1016/j.whi.2022.02.006>

³ Trussell J, Hassan F, Lowin J, Law A, Filonenko A. Achieving cost-neutrality with long-acting reversible contraceptive methods. *Contraception* 2015;91:49–56 . (Cost-benefit)



most effective methods of contraception. Alternatively, please consider a modifier for these rates specific to insertion of birth control implants.

Thank you for your consideration. If you have any questions or if we can provide further information, please contact me at (210) 223-4589 or EDelgado@TexasWHC.org.

Respectfully submitted,

A handwritten signature in black ink, reading "Evelyn Delgado". The signature is written in a cursive style with a large, looped initial "E".

Evelyn Delgado
Chair, Texas Women's Healthcare Coalition