

December 5, 2017

The Honorable Eric Hargan and CMS Administrator Seema Verma
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-9940-IFC
P.O. Box 8016, Baltimore, MD 21244

Dear Acting Secretary Hargan and Administrator Seema Verma:

As representatives of the education and youth development communities, we write to express opposition to the Administration's proposed rules ([CMS-9925](#) and [CMS-9940](#)). These rules will allow employers, schools, or even individuals who object to providing birth control to deny contraceptive coverage to their employees and students. The proposal will have a deleterious impact on girls and women, possibly leading to unintended pregnancies that will make it harder for girls to complete high school and college, and ultimately impacting their ability to become economically independent, contributing, fulfilled members of society.

Over the past twenty years, the teen pregnancy rate has plummeted and simultaneously, the high school graduation rate has climbed to the highest point in history. College-going rates are at an all-time peak too. Today, the high school graduation rate is [over 80%](#) and the college enrollment rate for high school graduates is [nearly 70 percent](#). The Trump Administration's rollback of contraception coverage endangers that progress.

Every day our members work with young people who are trying to complete their educations. Most aspire to finish high school and go to college. According to polls, 90% of young people [want](#) to attain a college degree. Yet, the harsh reality of teenage pregnancy can set them back. Only [40 percent](#) of teen mothers finish high school and [fewer than 2 percent](#) finish college by age 30. These young women, who become parents unexpectedly, struggle to finish their secondary education, much less fulfill their dreams of higher education and the economic self-sufficiency that comes with it. This situation has negative educational consequences not just in the near term, but also for future generations.

Contraception for all girls and women should be voluntary and free. Research shows that making it so leads to dramatic declines in the teen pregnancy rate. Take the state of [Colorado](#). Between 2009 and 2013, when the state provided free long acting reversible contraception, the teen birth rate, abortion rate, and pregnancy rate among unmarried women under age 25 who do not have a high school degree fell by 40 plus percent. Areas of the state that were concentrated with low-income people experienced the greatest declines.

Access to birth control has particularly important consequences for educational attainment because of the timing of high school and college degrees. The bottom line is access to free contraception can mean the difference between completing high school and college and not. And the returns to higher education have never been higher in this country.

As educators who are committed to helping all young people thrive, we believe strongly in the importance of allowing all girls and women to control their own childbearing decisions and to prioritize their education if they so choose. We urge the Trump administration to abandon these misguided IFRs and support access to affordable contraception for girls and women.

Sincerely,

American Association of University Women

American Federation of Teachers

Center for American Progress

Champion Women

Democrats for Education Reform

Girls Inc.

National Urban League

National Women's History Project

National Women's Political Caucus

Young Invincibles

YWCA USA