



November 21, 2024

Submitted electronically via <https://www.womenspreventivehealth.org/public-comment/>

Subject: Notice of Request for Public Comments on Draft Recommendations for the HRSA-Supported Women's Preventive Services Guidelines Relating to Screening and Counseling for Intimate Partner and Domestic Violence

Covered California and the California Public Employees' Retirement System (CalPERS) are writing in response to your request for public comment accompanying the Proposed Updates to the Health Resources and Services Administration (HRSA)-supported Women's Preventive Services Guidelines. Covered California ensures nearly 1.8 million Californians have access to equitable, high-quality care through 15 health plans, including Essential Health Benefits and preventive care aligned with HRSA guidelines. CalPERS, the largest commercial health benefits purchaser in California, secures comprehensive health benefits for approximately 1.5 million state and local government employees and their families, focusing on quality, equity, and accessibility. The comments in this letter refer to the proposed updates to screening and counseling for intimate partner and domestic violence. Separately, we also submitted comments on the proposed guidelines relating to breast cancer screening for women at average risk and guidelines relating to patient navigation for breast and cervical cancer screening.

We strongly support HRSA's proposed updates to screening and counseling for intimate partner and domestic violence. Establishing continuous care frameworks that include both in-person and telehealth options for follow-up is a critical step toward ensuring long-term support. Telehealth can serve as a valuable tool for individuals in rural or isolated areas where in-person care may be less available, enabling survivors to maintain consistent communication with healthcare providers. By expanding access to flexible follow-up options, we can help prevent gaps in care for those who need it. Additionally, we urge HRSA to update its guidelines to use more inclusive language, such as replacing "women" with "individuals" or "patients" to reflect the reality that intimate partner violence affects people across all gender identities. This change will ensure that the guidelines are sensitive to the needs of all individuals who may experience such violence, regardless of their gender identity or expression.

We thank HRSA for the opportunity to provide feedback on the proposed updates to the Women's Preventive Services Guidelines. We look forward to seeing the continued efforts of HRSA to support and expand preventive care across the nation.

Sincerely,

A handwritten signature in blue ink that reads "Jessica K. Altman".

Jessica Altman  
Executive Director  
Covered California

A handwritten signature in blue ink that reads "Marcie Frost".

Marcie Frost  
Chief Executive Officer  
CalPERS