

MEMO

Request for non-substantive change to add Title X grantees as a respondent to HRSA form (OMB Control Number: [0915-0285](#))

Date: December 5, 2013

The Office of Population Affairs (OPA), Office of the Secretary, Department of Health and Human Services, is requesting to add Title X service delivery grantees to HRSA's outreach and enrollment form "O&E Progress Report" and "O&E supplemental" of the Health Center Program Application Forms (OMB Control Number: [0915-0285](#)).

There are ninety-five (95) Title X grantees to be added as respondents. Due to the urgent nature of the data collection (described below), we are requesting to be added to HRSA's clearance. We believe this is a non-substantive request because the data being collected is identical to HRSA's existing cleared forms, the number of added respondents is low (95 additional respondents), and the respondents are similar to HRSA's respondents (safety-net providers). OPA has begun the process of obtaining their own clearance to collect this information. A 60 day federal register notice has published¹ and as soon as OPA receives full OMB clearance, we will remove these 95 Title X respondents from HRSA's clearance (through another non-substantive change request).

The Title X Family Planning Program ("Title X program" or "program") is the only Federal grant program dedicated solely to providing individuals with comprehensive family planning and related preventive health services (e.g., screening for breast and cervical cancer, sexually transmitted diseases (STDs), and human immunodeficiency virus [HIV]). By law, priority is given to persons from low-income families (Section 1006[c] of Title X of the Public Health Service Act, 42 USC 300). The Office of Population Affairs (OPA) within the Office of the Assistant Secretary for Health administers the Title X program.

Sixty percent of the five million clients seen at Title X funded service sites self-identify as being uninsured. Seventy percent of the total clients are under the age 30. Thus Title X service sites see a large proportion of young and uninsured individuals. With the implementation of the ACA and opening of the health care marketplace on October 1, 2013, many of the traditional clients served by Title X service sites will qualify for health insurance. As a trusted provider of a young, relatively healthy, and uninsured population, Title X providers are uniquely positioned to enroll individuals into the healthcare marketplace. OPA has been providing training to service sites since January 2013 to help them prepare for ACA implementation.

However, Title X grantees have reported varying degrees of local and State support to assist individuals in enrolling into health insurance. Some grantees have indicated significant barriers

¹ See notice at: <http://www.gpo.gov/fdsys/pkg/FR-2013-11-05/html/2013-26401.htm>

to assisting individuals with enrollment into health insurance programs due to political pressures at the State level. OPA has authorized grantees to use existing Title X funding to conduct outreach and enrollment activities. However, OPA is not currently collecting data on how many sites are conducting such activities, the impact of those activities in enrolling clients into health insurance programs, and the need for additional resources to conduct outreach and enrollment. Since the healthcare marketplace closes to enrollment on March 31, 2014, OPA needs information now to make informed decisions about providing additional resources to Title X grantees to conduct outreach and enrollment, and address barriers being encountered at the local and State level.

We are asking for OMB's approval to this non-substantive change request to add Title X grantees (total 95 respondents) to our existing HRSA forms to collect data on outreach and enrollment.