



November 22, 2021

To whom it may concern,

I am the CEO of Natural Womanhood, a non-profit organization whose mission is to promote fertility awareness methods of family planning as natural birth control options and tools for women's health.

In reading the 2019 WPSI guidelines that became effective in December 2020, I was happy to see that coverage for FABM instruction was included. This coverage must remain, and coverage for materials must be added to it, so that FABMs are included in the full range of contraception options. This will provide for true patient-centered counseling and choice. It appears, in the proposed language, that required coverage for FABM instruction has been deleted, which is of great concern. This would deprive women of the opportunity to be reimbursed for the expenses of a valid birth control option that has been listed by the Centers for Disease Control (CDC) as up to 2% effective.

The Clinical Section of the WPSI proposal lists only FDA-approved contraceptives for coverage. FABMs should not be excluded simply because they do not use drugs or devices, and therefore do not need FDA approval. They are valid methods, listed on the CDC website, and the CDC now cites a study by Urrutia which gives individual FABM effectiveness rates (<https://www.cdc.gov/reproductivehealth/contraception/index.htm>)

FABM instruction has a one-time cost. There are several types of FABMs, such as the ovulation-based, sympto-thermal, or sympto-hormonal methods. The cost to take an FABM course of instruction falls between \$120 – \$500 depending on which method a woman chooses. Some methods also have ongoing expenses, such as the sympto-hormonal method, which requires hormonal test sticks at a cost of about \$200 per year. These instruction and material costs should not have to be borne by an individual who chooses an FABM, removing access to effective and side-effect free options to many women; the costs should be covered as part of the WPSI initiative. To do otherwise would be creating a gross inequity of access to contraception into the WPSI proposal.

Should you have any questions, I can be reached by email at: gerard@naturalwomanhood.org.

Thank you for considering my comments.

Sincerely,

Gerard Migeon
President and CEO
Natural Womanhood