



July 15, 2024

Texas Health and Human Services Commission

Via Email: PFDAcuteCare@hhs.texas.gov

Re: Comments on Proposed Payment Rates for the Breast and Cervical Cancer Service (BCCS) Program

The Texas Women's Healthcare Coalition (TWHC) is comprised of 77 healthcare, faith, and community-based member organizations 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 health screenings and contraception – means healthy, planned pregnancies and the early detection of cancers and other treatable conditions. Our coalition advocates in support of women's health programs, including the Breast and Cervical Cancer Service (BCCS) program. In addition, we provide technical assistance and support BCCS program providers across the state.

On behalf of the TWHC, thank you for this opportunity to provide public comment on proposed adjustments to payment rates for the Breast and Cervical Cancer Services (BCCS) program. **We strongly urge HHSC not to implement proposed rate reductions in this crucial safety net program.**

BCCS provides essential health screenings that can detect cancer early, when it is most treatable. Our providers tell us that for many women served by this program, it has been 10 years since their last cervical cancer screening due to their inability to afford gynecological care. The lack of access to care leaves many women unaware of their cancer status until it is too late for effective treatment. By providing accessible screenings and promoting early detection, the BCCS program helps save lives. This is especially important in rural areas where healthcare resources are limited, and travel distances can be a significant barrier to accessing medical services.

Mortality rates for breast and cervical cancer among Texas women are higher than the national average, underscoring the need for the BCCS program. According to the National Cancer Institute, from 2016-2020, the breast cancer mortality rate for women in Texas was 19.7 per 100,000 women, making it the second leading cause of cancer death for women in the state¹. During the same period, the cervical cancer mortality rate was 2.8 deaths per 100,000 women, 27% above the US rate. These alarming statistics highlight the essential role of the BCCS program providing timely screenings and treatment. For vulnerable populations who face financial and geographical barriers to healthcare,

¹ <https://statecancerprofiles.cancer.gov/quick-profiles/index.php?statename=texas#t=3>



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access to the BCCS program can be lifesaving. Early detection not only increases survival rates but also reduces the cost and complexity of treatment², which is especially important for those with limited resources.

We are especially concerned that proposed rate decreases would impact the essential services most provided by this program. **Of the 8 most commonly utilized services, 6 are slated for a reduced rate of up to 27%**, including bilateral screening mammograms, 3-D mammography, pap smears, and HPV testing.

There are limited BCCS program providers, with only 348 providers serving patients statewide in FY22. On average, each contracted provider served 846 clients, with a median of 492 clients per provider. In 2022, 30,422 low-income women used the BCCS program.

Any cuts to the BCCS program are detrimental, severely impacting the financial viability of both the clinic and the women they serve. TWHC has received feedback from BCCS program providers indicating that it is challenging to find breast surgeons and imaging facilities willing to accept the current BCCS reimbursement rates. There is a concern among BCCS providers that the proposed rate cuts will exacerbate these issues. Further reductions would make it even more difficult to secure qualified surgeons and provide timely care. This decline in care quality would negatively affect aspects of patient treatment, including surgical interventions, accurate staging of the disease, and effective management of recurrences, ultimately compromising patient outcomes and potentially reducing survival rates.

BCCS serves as a program of last resort, and proposed cuts threaten essential services such as breast biopsies which is a procedure for women with identified breast abnormalities and at serious risk for breast cancer. Additionally, cuts to services like Pap tests hinder the early detection and treatment of cervical cancer and other abnormalities, contributing to overall reproductive health. These tests are essential for identifying high-risk patients and initiating timely care. Reductions in funding compromise the ability to deliver these life-saving screenings, leading to late-stage cancer diagnoses and reduced survival rates.

The impact of these health screenings extends beyond individual health to the well-being of families. Mothers play a critical role in raising healthy families, and their health directly affects their ability to care for their children. Ensuring that mothers have access to cancer screenings means they are more

² American Cancer Society Recommendations for the Early Detection of Breast Cancer, <https://www.cancer.org/cancer/types/breast-cancer/screening-tests-and-early-detection/american-cancer-society-recommendations-for-the-early-detection-of-breast-cancer.html>



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likely to stay healthy and provide necessary support and stability for their families. Early detection and treatment prevent prolonged illness and reduce the emotional and financial burden on families, fostering a healthier, more secure environment for children to grow up in. In essence, breast and cervical cancer screenings are not just about saving lives; they are about preserving the health and well-being of entire families and communities.

On behalf of our providers and the women they serve, the Texas Women's Healthcare Coalition strongly urges HHSC not to reduce rates for the BCCS program.

Respectfully submitted,

Evelyn Delgado
Chair, Texas Women's Healthcare Coalition