Children's Hospital of Philadelphia PolicyLab

Increasing Adolescents' Access to Over-the-counter Contraception and Preventive Services

Adolescent Health & Well-Being

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In December 2024, PolicyLab researchers and other partners at Children's Hospital of Philadelphia (CHOP) responded to the U.S. Departments of Health and Human Services, Labor, and Treasury proposed rule to require insurers to cover over-the-counter (OTC) contraception without any out-of-pocket cost for those insured. Our comments focused on considerations for youth and adolescents' needs, drawing on the team's expertise in sexual and reproductive health, HIV prevention and treatment, and health equity. However, in January 2025, the departments withdrew the proposed rule, effectively halting updates to and finalization of the rule.

While this specific policymaking opportunity is paused, below I highlight the main points of PolicyLab's recommendations for enhancing the coverage of preventive health care for adolescents and examples of states working to address existing barriers.

OTC contraception is a promising option for adolescents, and minimizing barriers to access is crucial. To support that aim, our experts suggested:

1) OTC contraception should be available for extended dispensing

Research shows that extended dispensing of 12 months reduces costs for the health system and rates of pregnancy, even among adolescents and young adults. Over half of states have already established policies requiring insurers to cover extended contraceptive supplies, demonstrating feasibility and demand.

2) Product and coverage information should be clear and accessible

Improving the clarity and detail of covered benefits, such as services and specific product names, and ensuring transparent processes for requesting exceptions to covered benefits will enable youth to make informed decisions about their reproductive health.

3) Unique circumstances threatening the privacy of adolescent patients should be considered

Youth are susceptible to unique threats to their confidentiality such as instances where the explanation of benefits (EOB) sent by the insurer reaches adolescents' caregivers. Confidentiality is an important factor for many youth when they seek contraception.

4) Coverage of a larger subset of medically necessary preventive services, including pre-exposure prophylaxis (PrEP), is important for adolescents

Adolescence is a critical time of development with lifelong implications for individual's health and well-being, so it is particularly important that preventive services such as OTC contraception, PrEP, tobacco and other substance use cessation are financially accessible.

In the absence of federal policy, there are still opportunities for and examples of state policy addressing some of these recommendations. Among these are policies extending contraception dispensing periods and explicitly covering OTC contraception without a prescription, for example. A few states have also been working towards addressing adolescents' privacy concerns when it comes to EOBs issued by insurers. While a federal path to improve coverage and access to OTC contraception may be paused, the work continues at the state level.

Connecting research to policy

Connecting research to policy is a large part of the work we do here at PolicyLab. One of the most practical ways we do this is by participating in rule-making processes at the local, state and federal levels. Most recently, we've responded to comments on child nutrition programs and Pennsylvania's 1115 Medicaid waiver. Part of my role at PolicyLab is surveilling and sharing opportunities for public comments on proposed rules or other policymaking processes with our researchers.

Often framed as requests for information or comment (RFIs or RFCs), these are opportunities to inform executive agency decision-making, highlight potential unintended consequences of the rule, and even build an administrative record for later litigation in some cases. What's more, agencies are required to review and respond to public comments—so whether proposed rules elicit our support or opposition, it is worthwhile to put our position in writing.

At PolicyLab, we will continue to identify and contribute to requests for input issued by different agencies as well as other bodies that set policy and practice as they arise.

As of writing, there is a freeze on federal rulemaking processes.

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