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May 25, 2022

Office of Legislative and Regulatory Affairs  
New Jersey Department of Banking and Insurance  
20 West State Street, P.O. Box 325  
Trenton, NJ 08625-0325

**Re: Response to New Jersey Department of Banking and Insurance  
Request for Feedback Pursuant to Section 3 of P.L. 2021, c 375.**

To Whom It May Concern,

I write on behalf of the New Jersey Health Care Quality Institute (“Quality Institute”) in response to the Department’s request for feedback pursuant to section 3 of the Freedom of Reproductive Choice Act which requires the Department to determine whether regulations are necessary to secure comprehensive insurance coverage for reproductive care to enable New Jersey residents to fully exercise their freedom of reproductive choice.

The Quality Institute is an independent, nonpartisan organization focused on improving the safety, quality, and affordability of health care for everyone. Access to reproductive health services, including contraceptives and abortion care, is a priority area of the Quality Institute as we understand that these essential health care services promote positive individual and public health outcomes. Indeed, all New Jersey residents should have the ability to make decisions about their reproductive health and access the essential services they need. Thus, it is important to study and understand any existing barriers to accessing this care -- including any regulatory or financial barriers.

In considering this issue and undertaking its study, we encourage the Department to consider the full spectrum of access to reproductive health services as access to high-quality and patient-centered contraceptive care results in fewer unintended pregnancies. Unfortunately, researchers have found that approximately 435,050 women in New Jersey live in counties that lack reasonable access to the full range of contraceptive methods.<sup>1</sup> Accessible contraceptive care is the cornerstone of good reproductive health care.

The Quality Institute led a study and workgroup from 2018-2020, the New Jersey Reproductive Health Access Project (NJ-RHAP). Through that work, we identified significant patient, provider, and systemic barriers making it difficult for individuals in New Jersey to access the full range of reproductive health care, including individuals who had various types of insurance or who were uninsured. As a result of this work, we released a [toolkit](#) in June 2020 to support health care providers delivering this care.

We encourage the Department to review our findings and toolkit resources. We are grateful to the many New Jersey reproductive health care providers, health systems, community-based organizations, payers, pharmaceutical companies, patient advocates, and subject matter experts who contributed to these resources and encourage you to reach out to us or them for further information and support in your study.

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<sup>1</sup> [https://powertodecide.org/sites/default/files/2021-05/State%20Factsheet\\_New%20Jersey.pdf](https://powertodecide.org/sites/default/files/2021-05/State%20Factsheet_New%20Jersey.pdf)

As states across the country are creating legal barriers to time-sensitive reproductive health care, including abortion, the demand for these essential services will continue to grow in New Jersey. We fully support New Jersey's efforts to ensure that everyone can meaningfully access high-quality and affordable reproductive health care - including the requirement for health insurance to provide coverage for abortion services.

Thank you for your consideration of these comments.

Sincerely,

Brittany Lee, LSW  
Program Officer, New Jersey Health Care Quality Institute  
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