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Docket: IRS-2008-0103Request for Information Regarding Sections 101 Through 104 of the Genetic Information
Nondiscrimination Act of 2008**Comment On:** IRS-2008-0103-0017Interim Final Rules Prohibiting Discrimination Based on Genetic Information in Health Insurance
Coverage and Group Health Plans**Document:** IRS-2008-0103-0048

Comment on FR Doc # E9-22504

Submitter Information**Name:** Marianne C O'Connell**Address:**6150 Oak Tree Blvd
Independence, OH, 44131**Email:** moconnell@llsa.com**Phone:** 216-581-6556**Fax:** 216-581-9611**Organization:** Life Line Screening

General Comment

December 17, 2009

Timothy Geithner, Secretary
U.S. Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

Dear Mr. Geithner:

Life Line Screening (LLS) is the nation's largest provider of community based health screening services. Our services are dedicated to empowering individuals to be proactive about their health. LLS will screen over 840,000 people this year, providing valuable information about stroke, heart disease, diabetes, and abdominal aortic aneurysms. Our services are paid out of pocket and participants are encouraged to bring their results to their physician for any follow up testing and treatment.

In 2008, LLS began to offer a risk assessment program to our customers. This risk assessment uses family history, along with a clinical assessment to determine an individual's risk of six diseases: coronary heart disease, stroke, diabetes, congestive heart failure, chronic obstructive pulmonary disease and lung cancer. We offer this assessment through our community based screenings and our corporate clients. Our own employee base is also offered this risk assessment as a tool to be proactive about their health.

The GINA rules enacted this year prohibits the use of simple family history questions for this risk assessment. While we applaud the effort to make healthcare more accessible to all, this effort restricts any corporate effort to encourage their employees to take responsibility for their health. We would encourage delaying the enactment of the current rules until all of the ramifications are known.

Very truly yours,

Jim Kuhn
Vice President, Human Resources

Attachments

IRS-2008-0103-0048.1: Comment on FR Doc # E9-22504



December 17, 2009

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1500 Pennsylvania Avenue NW
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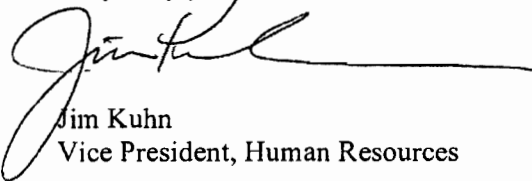
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