St. John's
HOSPITAL
SPRINGFIELD, ILLINOIS

September 27, 2011

The Honorable Kathleen Sebelius
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Sebelius:

I am writing to express St. John's Hospital's opposition to the Interim Final Rules on Preventive Services issued by HHS last month. We object to the Rules' mandate that all private health care plans cover prescription contraceptives approved by the FDA (including abortifacient drugs) and surgical sterilizations.

As a Catholic Hospital founded in 1875 to continue the healing ministry of Jesus Christ, we are committed to protecting life and do not believe the government should classify pregnancy as a disease to be prevented or terminated. It is imperative the Final Rules include broader conscience protections. We believe including a conscience clause would not reduce access to care or harm any patient's well being. However, if Catholic hospitals close due to this blatant breach of their Catholic values, we do believe access to care will be reduced significantly. It would be very helpful if you could explain how this mandatory provision of prescription contraceptive will help to improve the health of community services by Catholic hospitals. While the Interim Final Rules acknowledge the need for conscience protections, we are deeply concerned that the proposed religious exception falls far short of the level of protection needed. Therefore, we respectfully request the interim ruling be revised to specifically state Catholic hospitals (faith-based providers) will not be requested to breach their values.

We also believe the Rules directly contradict previous law. The Patient Protection and Affordable Care Act, the Weldon Amendment, the Church Amendment and conscience protections in Medicare, Medicaid and federal employee health benefit programs establish clear prohibitions on requiring abortion coverage. If these Rules are adopted, they would undermine the will of the Congress.

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*An Affiliate of
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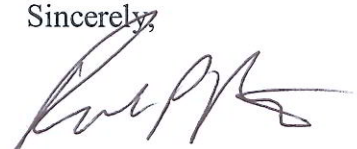
We are also deeply concerned about the Rules' extremely narrow exemption offered to religious employers. There are no protections offered for health care insurers, practitioners or purchasers. As written, an organization would not be "religious enough" for exemption under the Rules if it served people of different faiths, failed to hire based on religion or did not restrict its mission to the inculcation of religious values.

For these reasons, we ask that the regulation be revoked or modified to preserve the public ministry of religious institutions.

Thank you for your consideration.

Sincerely,



Robert P. Ritz
President and CEO