ARCHDIOCESE
OF PORTLAND
IN OREGON

Office of the Archbishop

September 27, 2011

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attn: CMS-9992-IFC2
PO Box 8010
Baltimore, Maryland 21244-8010

Re: Interim Final Rules on Preventive Services
File Code CMS-9992-IFC2

Dear Sir or Madam:

The Archdiocese of Portland in Oregon ("Archdiocese") respectfully submits the following comments on the interim final rule on preventative services (76 Fed. Reg. 46621 (Aug. 3, 2011)). The Archdiocese is the territorial division of the Roman Catholic Church comprising the western third of the state of Oregon. More than ninety percent of the approximately half million Catholics residing in Oregon live within the Archdiocese.

The Archdiocese supports access to life-affirming health care for all. The above-noted interim final rule on preventative services raises serious concerns in this regard.

We endorse the comments of the United States Conference of Catholic Bishops as set forth in its letter dated August 31, 2011. The USCCB articulates well the concerns of the Archdiocese that: 1) coverage of prescription contraceptives, sterilization, and related patient education and counseling should not be mandated in all health plans as preventative "health" services; and 2) the regulation's religious exemption is insufficient to safeguard the rights of all individuals and entities with moral or religious objections to contraception or sterilization.

The Archdiocese urges the Department of Health and Human Services to rescind the mandated coverage of prescription contraceptives, sterilization, and related patient education and counseling in all health plans. In the alternative, if HHS declines to do so, then the final rule must include an appropriately broad exemption for all stakeholders – individuals, insurers and employers – with a religious or moral objection to the provision of these services.

Respectfully submitted,

+ John G. Vlazny

Most Reverend John G. Vlazny
Archbishop of Portland in Oregon

2838 E. Burnside Street, Portland, Oregon 97214-1895 503/234-5334