ARCHDIOCESE OF WASHINGTON

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September 30, 2011

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attn: CMS-9992-IFC2
P.O. Box 8010
Baltimore, MD 21244-8010

SUBMITTED ELECTRONICALLY

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

Dear Sir or Madam:

On behalf of the Roman Catholic Archdiocese of Washington, I respectfully submit the following comments on the interim final rule on preventive services. 76 Fed. Reg. 46621 (Aug. 3, 2011). Home to over 600,000 Catholics, the Archdiocese represents the Catholic Church in Washington, D.C. and Calvert, Charles, Montgomery, Prince George's, and St. Mary's counties in Maryland.

The Archdiocese endorses the comments submitted by the United States Conference of Catholic Bishops ("USCCB") on August 31, 2011. We write to express our grave concerns regarding the regulation's mandate that all private health insurance plans provide coverage for preventive services that include surgical sterilization, all FDA-approved contraceptives, including drugs that can cause abortions in the early weeks of pregnancy, and "education and counseling" to promote these to all women of reproductive capacity. Pregnancy is not a disease, and drugs and surgeries to prevent it are not basic health care that the government should require all Americans to purchase. The mandate directly conflicts with the religious beliefs of individuals and institutions who have a moral objection to such practices, and who do not believe that such "preventive services" constitute legitimate health care. Never has the federal government mandated private health plans to include such coverage.

The proposed religious exemption is radically narrow and most religious institutions that serve the public would be ineligible for an exemption. For Catholic institutions in the Archdiocese of Washington, this would mean that religious liberty is applicable only if they hire primarily Catholics, serve primarily Catholics, and attempt to convert to Catholicism anyone who seeks their services. Yet through these schools, hospitals, and vast array of social service programs, the Catholic Church serves all those

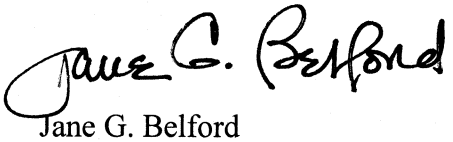
who come to us in need and welcomes peoples of all faiths to our employment whenever possible. This new mandate would severely impede our ability to freely practice our religious beliefs in service to our neighbors. Most Catholic charitable institutions that serve the public would be ineligible for the exemption, in which case they would be forced to provide health care coverage of drugs and procedures to which they have a moral objection or decline to offer health benefits to their employees.

The Catholic Church in the Archdiocese of Washington has a long history of serving the social, educational, and medical needs of the community through a vast array of Catholic institutions. Like many other religious communities, we provide this public service out of our faith tradition's call to serve our neighbor with the reasonable expectation that we can do so in a manner consistent with our moral beliefs.

Based on our deeply held religious beliefs, we urge the Department of Health and Human Services to rescind the mandate in its entirety and to allow all organizations and individuals to offer, sponsor, and obtain health coverage that does not violate their moral and religious convictions.

Thank you for the opportunity to comment on these regulations.

Sincerely,



Jane G. Belford
Chancellor