

# PUBLIC SUBMISSION

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**Docket:** EBSA-2010-0018

Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services Under the Patient Protection and Affordable Care Act

**Comment On:** EBSA-2010-0018-0002

Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services under Patient Protection and Affordable Care Act: Amendment

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Comment on FR Doc # 2011-19684

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## Submitter Information

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## General Comment

I am writing to urge you to broaden the proposed definition of "religious employer" to ensure that conscience protections will be in place to allow us to continue operating our health ministry in a manner consistent with our Catholic faith tradition and the ethical, moral and social teachings to which we are committed.

We welcome the decision to require health plans to cover the cost of women's preventive health services.

Thank you for including in the Interim Final Rule provisions exempting "religious employers" from providing coverage for services that are inconsistent with their faith teachings. However, we must respectfully bring to your attention the fact that the definition of organizations who may exercise their freedom of religious conscience is not adequate to provide the protection needed by the Catholic health care providers in our nation.

We request that the definition of "religious employer" be rewritten using the principles underlying the "church plan" exemption found in section 414(e) of the Internal Revenue Code developed specifically to avoid church-state entanglements in religious governance of pension, health and welfare plans offered by religious entities.

Sincerely,

Sister Kathleen Reilly, csc

Vice-President of Mission Integration  
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