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LEGAL PROCESSING DIVISION
PUBLICATION & REGULATIONS
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Docket: IRS-2008-0103

Request for Information Regarding Sections 101 Through 104 of the Genetic Information
Nondiscrimination Act of 2008

Comment On: IRS-2008-0103-0017

Interim Final Rules Prohibiting Discrimination Based on Genetic Information in Health Insurance
Coverage and Group Health Plans

Document: IRS-2008-0103-0054

Comment on FR Doc # N/A

Submitter Information

Name: Marvin E McDaniel

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414 Nicollet Mall

Suite 500

Minneapolis, MN, 55401

Submitter's Representative: Human Resources

Organization: Xcel Energy

Government Agency Type: Federal

Government Agency: HRSA

General Comment

Request letter to rescind the interim final rules for the Genetic Information Nondiscrimination Act
(GINA)

Attachments

IRS-2008-0103-0054.1: Comment on FR Doc # N/A



P. O. Box 840
Denver, Colorado 80201-0840

December 17, 2009

Office of Health Plan Standards and Compliance Assistance
Employee Benefits Security Administration, Room N-5653
United States Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

Attention: Regulatory Information Number 1210-AB27

To Whom It May Concern:

Xcel Energy Inc. is an electricity and natural gas energy company. We have regulated operations in 8 Western and Midwestern states, with more than 11,000 employees. We sponsor numerous health & welfare benefit plans for our bargaining and non-bargaining employee population.

This letter serves as Xcel Energy Inc's request to rescind the interim final rules for the Genetic Information Nondiscrimination Act (GINA), as these restrictions will adversely impact our voluntary wellness and disease management programs, as follows:

- Family medical history is vital to our health assessments. Implementation of this legislation will require system removal of questions related to key medical information intended to assist members with their health concerns.
- Incentives for completion of health assessments have been proven to be vital in driving member participation.
- These regulations inhibit the ability of our health and welfare benefit plans to control costs and improve quality.
- If these rules are implemented, they will have serious adverse impacts on our company's wellness and disease management programs.

Your assistance in rescinding GINA is greatly appreciated. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marvin E. McDaniel'.

Marvin E. McDaniel
VP & Chief Administrative Officer