

# PUBLIC SUBMISSION

<b>As of:</b> August 29, 2011
<b>Received:</b> August 26, 2011
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 80efe011
<b>Comments Due:</b> September 30, 2011
<b>Submission Type:</b> Web

**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

**Document:** EBSA-2010-0018-DRAFT-0067

Comment on FR Doc # 2011-19684

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## General Comment

Thank you for the opportunity to comment on the recent amendments to the PPACA regarding women's health care. As a human resources professional (for a local government agency) who is responsible for balancing the needs of both the employer and the employee, I am in a unique position to evaluate the pros and cons of this guidance.

I applaud the agencies for ensuring that health care services are available and affordable for all Americans - especially women and children. However, the cost sharing component the rental of breast feeding equipment is my major concern with the recent amendment.

Although I support the encouragement of nursing infants by new mothers, I don't support the health plans covering 100% of the cost for the equipment. Being a mom who breast fed my children, I can attest that there is no equipment required to be successful. While the equipment I used was convenient for me, it is not necessary. This convenience is clearly beneficial to working mothers like me, but that alone should not dictate that health plans are the party responsible for the costs. While requiring plans to cover this equipment (similar to other durable medical equipment) may be a step in the right direction, there should be a cost-share decision by the plan. I've found that if someone has a little "skin in the game", like a co-pay, they are more likely to use the services. For example, if I have to pay to use the health club, I'm more likely to workout there regularly than if I'm not writing that check every month. I would hate to see every mother get the equipment and only half ever use it, thus wasting plan dollars that could have offset expenses elsewhere. This is especially true in a health plan that is subsidized by taxes, such as the one provided by my local government employer. Also, as both a taxpayer and HR manager for a government organization, I am concerned about the taxpayer's full 100% responsibility in this area.