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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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Organization: Bon Secours St Anthony Community Hospital

General Comment

September 23, 2011

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-9992-IFC2
Room 445-G, Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Re: Interim Final Rules defining Religious Employer Exception for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services under the Patient Protection and Affordable Care Act, RIN 0938-AQ07

Dear Sir or Madam:

On behalf of the Bon Secours Charity Health System, I am writing to urge you to broaden the proposed definition of "religious employer" to ensure conscience protections that will allow us to continue our health ministry as Catholic employers. Our health system was established by the Sisters of Bon Secours of Paris who specifically came to the United States in 1881 to offer spiritual support and medical care to those who were sick and dying. The Sisters of Bon Secours congregation came was formed shortly after the Revolution in France in 1824. Twelve women gathered in Paris together

to serve Christ in those many poor and devastated people who were in need, especially the sick and dying.

Our three hospitals, two nursing homes and adult assisted living facility have even a deeper religious history whereby each health facility was originally founded by different religious congregation. Good Samaritan Hospital, Suffern, NY was founded by Mother Mary Mehegan and her sisters, the Sisters of Charity of New Jersey. The Sisters of Charity came to Suffern to establish the healing ministry of Jesus. The Sisters of Charity have their roots in the ministry established by St. Vincent de Paul and Saint Louise de Marillac, who established the spiritual and nursing ministry of Jesus for the poor.

St. Anthony Community Hospital, Schervier Pavillion (nursing and rehabilitation center) and Mt. Alverno Center (assisted living facility) Warwick, NY were founded by the Franciscan Sisters of the Poor. Blessed