

# PUBLIC SUBMISSION

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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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## General Comment

The New Mexico Religious Coalition for Reproductive Choice thanks the Department of Health and Human Services for adopting all of the Institute of Medicine's recommendations for women's preventive services, including covering FDA approved-contraception. Covering contraception without co-pays removes a barrier that hinders many women - particularly those who are low-income or have little access to healthcare - from gaining access to this fundamental piece of health care. Family planning is a moral value that diverse religions recognize as a tool to build strong families, protect the health of women and children, reduce child and spousal abuse, prevent unwanted pregnancies, and reduce the need for abortion.

However, we are disturbed that, in the interim rule, "religious employers" are exempt and their employees would not be able to have coverage for family planning prescriptions and devices in new health care plans. We believe that each woman—her beliefs, her faith, and her health—matters. Women of faith, including Catholic women, use contraception at the same rate as the general population; it is a woman's moral choice and should be protected regardless of where she is employed. No person should be left behind in the vision for the Affordable Care Act that we were promised, but the proposed regulations will do just that.

We fully support HHS adopting the IOM recommendations, including coverage of contraception without co-pays, and oppose the exemption for religious employers as it is harmful for women's health and it further erodes the conscience rights of individuals in favor of corporations' or entities' rights and it will exclude some women from getting the care they need to be healthy, have healthy pregnancies and have healthy babies.

Please remove the proposed religious employer refusal provision from your Women's Preventive Services rule.