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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

Submitter Information

General Comment

To: Department of Labor
Department of Health & Human Services
Department of the Treasury IRS

Subject: DOL: RIN 1210-AB44
DHHS: CMS-9992-IFC2
IRS: REG-120391-10

I strongly oppose the components of the regulations listed above that pertain to the requirement that all health plans cover preventative care for women that would include providing contraceptive drugs that according to the FDA can end the development of a living human embryo. Additionally, the provisions within these regulations that allow for religious exemption are woefully inadequate. Many religious affiliated institutions of higher learning serve students of various faiths as well as the general population but the institution and specifically those employed with the university maintain a set of core beliefs. One of these foundational beliefs is the value of life and the protection thereof.

This extremely narrow definition of a "religious employer" is unprecedented in federal law. This narrow definition and the provisions requiring health plans to provide controversial contraceptive drugs place CMS-9992-IFC2 in conflict with the Religious Freedom Restoration Act of 1993 (RFRA) as well as the U.S. Constitution.

I urge our elected representatives to work diligently to modify CMS-9992-IFC2 to exclude the provisions for providing the controversial contraceptive drugs and to include a definition of "religious employer" that is consistent with past legislation, the Religious Freedom Restoration Act of 1993 and the U.S. Constitution.