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Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services; etc.

Comment On: HHS-OS-2010-0018-0001

Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services; etc.

Document: HHS-OS-2010-0018-DRAFT-0010

Comment on FR Doc # 2010-17242

Submitter Information

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Organization: San Francisco Department of Public Health

General Comment

The San Francisco Department of Public Health recommends that the final regulations to implement Section 2713 of the "Patient Protection and Affordable Care Act", Public Law 111-148 be clarified to include specific language that group health plans and health insurance issuers provide tobacco cessation treatment benefits that cover all seven FDA-approved medications and all three forms of counseling (individual, group, and telephone) outlined in the 2008 U.S. Public Health Service Guideline, and that there be no limit on the number of quit attempts that would be covered. The SFDPH is concerned that, as written, the current Interim Final Rules issued last month are not clear as to whether all seven FDA approved medications and all three forms of counseling outlined in the 2008 U.S. Public Health guidelines are required to be covered. Additionally, the SFDPH is concerned that it is not clear whether a limit would be placed on the number of attempts to quit smoking that would be covered.

According to the CDC, the most effective health insurance benefits are those that include patient reimbursements for smoking cessation counseling and FDA-approved pharmacotherapeutic treatments, and reimbursements to clinicians for providing tobacco dependence treatment, just as they are reimbursed for treating other chronic conditions.

The City of San Francisco has embraced a multi-faceted approach to reduce tobacco use, while protecting individuals from insurance coverage barriers as they battle their addiction to nicotine:

1. We have endorsed a policy calling on the health plans that provide health insurance coverage for City and County employees to offer comprehensive smoking cessation benefits consistent with Centers for Disease Control and Prevention guidelines.
2. The City of San Francisco covers smoking cessation services and treatments for the uninsured.

Attachments

HHS-OS-2010-0018-DRAFT-0010.1: Comment on FR Doc # 2010-17242

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