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September 17, 2010

Secretary Kathleen Sebelius
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

RE: Comments on **OCIIO-9992-IFC**, Interim Final Rules for Group Health Plans Health Insurance Issuers Relating to Coverage of Preventive Services under the Patient Protection and Affordable Care Act

Dear Secretary Sebelius:

The Religious Coalition for Reproductive Choice (RCRC), the nation's interfaith organization supporting reproductive rights, submits these comments on the 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 (PPACA). Our member organizations include the following: the Episcopal Church; Presbyterian Church (USA); United Church of Christ; General Board of Church and Society, United Methodist Church; General Board of Global Ministries, Women's Division, United Methodist Church; Unitarian Universalist Association; and the Conservative, Reform and Reconstructionist movements of Judaism. Other members include Catholics for Choice, Church of the Brethren Women's Caucus, Disciples for Choice, and the Lutheran Women's Caucus.

We offer our strong support for the requirement that insurers cover preventive services for women without cost-sharing. We also recommend that the coverage be extended to include contraception.

Why Women's Preventive Services are Important

Preventive health services are an essential component of health care at every stage of life; however, according to the *New England Journal of Medicine*, women in this country only receive about half of these recommended services.¹ Not receiving preventive services leads to consequences such as unintended pregnancy and chronic diseases. The main reason women do not receive preventive care is that health insurance imposes burdensome cost-sharing requirements. Cost-sharing creates a barrier to women receiving preventive health services such as cervical cancer screening, prenatal care, blood pressure screening and tests for diabetes. We wholeheartedly support the Women's Health Amendment as it provides women, particularly those who are underserved, with preventive health services, including reproductive care.

¹ "Promoting Prevention through the Affordable Care Act," Howard K. Koh and Kathleen G. Sebelius, *NEJM*. August 25, 2010.



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Why People of Faith Support Contraception as Preventive Care

American people of faith recognize that family planning helps build strong families, protect the health of women and children, reduce child and spousal abuse, and prevent unwanted pregnancies. There are about 3 million unplanned pregnancies in this country every year and comprehensive contraceptive care is essential for reducing unintended pregnancies and other preventable health problems.

Family planning is embraced by religions across the spectrum as a moral good, a responsible choice, and a basic human right. Among our member organizations, **the Episcopal Church** first approved of contraception in 1930 and in 1994 took their support further by directing its dioceses and agencies to “provide information to all men and women on the full range of affordable, acceptable, safe, and non-coercive contraceptive and reproductive health care services.” **Jewish traditions** have a long history of support for family planning, including a 1929 Reform resolution asserting that birth control contributes to social stability. **Unitarian Universalists** consider access to contraception a human right. **The United Church of Christ** recognizes that God “has called us to share the work of creation with him, giving us the privileges and responsibilities of fellowship in this family.” **The United Methodist Church** has declared that “each couple has the right and the duty prayerfully and responsibly to control conception according to their circumstances.” It is also important to note that they support “adequate public funding and increased participation in family planning services by public and private agencies.”

Among non-member traditions, the Evangelical Lutheran Church of America has stated that, “a married couple should plan and govern their sexual relations so that any child born to their union will be desired both for itself and in relation to the time of its birth.” The Southern Baptist Convention supports the use of some forms of family planning by married couples. As stated by their Ethics and Religious Liberty Commission, family planning is “a moral decision for the couple.” While the Roman Catholic Church forbids the use of contraception, according to the 2002 National Survey of Family Growth, 96.2% of Catholic women of childbearing age who are sexually active use some form of contraception.

Given the high public health value of comprehensive contraceptive services, it is important to implement and strengthen these provisions of the PPACA. It is our recommendation that comprehensive contraceptive care be among the women’s preventive health services detailed in the HRSA guidelines and covered by insurance and protected from cost-sharing requirements.

Sincerely,

A handwritten signature in black ink that reads "Carlton W. Veazey".

Reverend Dr. Carlton W. Veazey
President and CEO
Religious Coalition for Reproductive Choice