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Docket: IRS-2008-0103

Request for Information Regarding Sections 101 Through 104 of the Genetic Information
Nondiscrimination Act of 2008

Comment On: IRS-2008-0103-0017

Interim Final Rules Prohibiting Discrimination Based on Genetic Information in Health Insurance
Coverage and Group Health Plans

Document: IRS-2008-0103-0051

Comment on FR Doc # E9-22504

Submitter Information

General Comment

Interim Final Rules Prohibiting Discrimination Based on Genetic Information in Health Insurance
Coverage and Group Health Plans (Document ID IRS-2008-0103-0017) - Comments

Attachments

IRS-2008-0103-0051.1: Comment on FR Doc # E9-22504

Amanda F Kelley
3131 Gables Way NE
Atlanta, GA 30329

Timothy Geithner
Secretary
U.S. Department of Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

Kathleen Sebelius
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue SW
Room 639G
Washington, DC 20201

Hilda Solis
Secretary
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Stuart J. Ishimaru
Acting Chairman
U.S. Equal Employment Opportunity Commission
131 M Street, NE
Washington, DC 20507

cc: Robert Kocher, MD, Special Assistant to the President, National Economic Council, The White House
Ezekiel Emanuel, MD, Special Advisor for Health Policy, Office of the Director, Office of Management and Budget

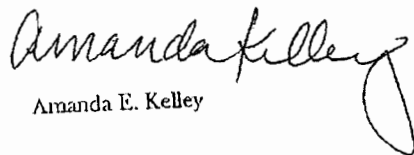
To Whom It May Concern:

I fully support the goal of the Genetic Information Nondiscrimination Act (GINA) to prevent improper use of genetic information in hiring practices and in the provision and pricing of health insurance. However, elements of the Oct. 7, 2009, GINA interim final rule will create significant barriers to the use of health risk assessments and access to wellness and chronic disease management programs.

Family medical history is a key data point in determining the most effective interventions for preventing and managing chronic conditions. Excluding family medical history from a Health Risk Assessment would be costly and potentially dangerous. According to a recent study conducted by the Center for Health Research, Reducing chronic disease risk through HRAs and other evidence-based practices can produce substantial savings. The CHR found that interventions that reduce risk progression or decrease risk prior to Medicare enrollment can lead to net cost savings despite increasing longevity - as much as \$1.4 trillion over 10 years.

We have just suffered a terrible recession and our current deficit is outrageous. We are in no position to start making healthcare reforms that jeopardize the health of our citizens or our economy. Please ask the departments of Health and Human Services, Labor and the Treasury to delay implementation and enforcement of the interim final rule until the risks to our citizens' financial and medical wellbeing have been assessed.

Sincerely,


Amanda E. Kelley