

**From:** [Ellen Shaffer](#)  
**To:** [E-OHPSCA2713.EBSA](#)  
**Subject:** Comment on religious exception, Re: CMS-9992-IFC2  
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August, 6, 2011

DEPARTMENT OF THE TREASURY

Internal Revenue Service

26 CFR Part 54

TD 9541

RIN 1545-BJ60

DEPARTMENT OF LABOR

Employee Benefits Security Administration

29 CFR Part 2590

RIN 1210-AB44

DEPARTMENT OF HEALTH AND HUMAN SERVICES

CMS-9992-IFC2

45 CFR Part 147

RIN 0938-AQ07

Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services under the Patient Protection and Affordable Care Act

We applaud HHS' regulations accepting the Institute of Medicine's well-grounded recommendations for adding 8 new preventive services for women to be covered without additional co-payments and deductibles. The scientific recognition of these important services, including contraception and screening for domestic violence, and easing the economic burden to access them, will enormously improve the lives of all women and their partners and families.

We regret however the amendment offering certain religious employers the option not to include contraception as a preventive service. We appreciate that the religious employers in question are narrowly defined, in accordance with earlier court cases; in essence, church employees could be affected, but not church-affiliated hospitals or health plans.

Nevertheless, many women who work for and attend the Catholic Church, for example, do not necessarily agree with the Church's position banning all but one method of contraception. Virtually all sexually active Catholic women have used a banned method of birth control, and 63% support covering contraception through insurance. It is unfortunate that some of these women would be asked to choose among their faith, their families, and the opinions of their employers.

We request that HHS reconsider and reverse this amendment.

Ellen R. Shaffer, PhD MPH, Trust Women/Silver Ribbon Campaign

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Ellen R. Shaffer, PhD MPH  
Co-Director, Center for Policy Analysis  
San Francisco Presidio  
P.O. Box 29586  
San Francisco, CA 94129-0586

Phone [415-922-6204](tel:415-922-6204)  
cell: [415-680-4603](tel:415-680-4603)  
fax: [415-885-4091](tel:415-885-4091)  
[ershaffer@gmail.com](mailto:ershaffer@gmail.com)  
[www.oursilverribbon.org](http://www.oursilverribbon.org)