September 28, 2010

Donald Berwick, M.D., Administrator
Centers for Medicare & Medicaid Services Department of Health and Human Services
P.O. Box 8010 Baltimore, MD 21244-8010

RE: OCIIO-9995-IFC, Pre-Existing Condition Insurance Plan Program

Dear Dr. Berwick:

I respectfully submit these comments on the Interim Final Rule for the Pre-Existing Condition Insurance Plan Program (PCIP) established under section 1101 of Title I of the Patient Protection and Affordable Care Act (PPACA). As Catholics, we believe that healthcare is a right, not a privilege. Catholic social teaching calls for a preferential option for the poor and we believe that call includes comprehensive healthcare for every person living in the United States. Nearly three-quarters (73 percent) of US Catholics believe that providing healthcare for people who need it is important because it is a matter of social justice. (Belden Russonello and Stewart, 2008)

The PCIP was created to provide uninsured Americans who have pre-existing conditions a way to access coverage for their healthcare, in the interim between the passage of the PPACA and full implementation of the law. Abortion is a legal medical procedure in the United States and should be covered in any healthcare plan, especially those plans designed to provide access to care for those who need it the most. We believe abortion care is an essential part of comprehensive healthcare. Americans—Catholic and non-Catholic alike—believe that the healthcare should require insurance companies to cover this vital procedure. Women’s lives depend on it.

The definition of sexual and reproductive health supported by conservatives such as the United States Conference of Catholic Bishops (USCCB) and their protests to the inclusion of abortion in healthcare reform is not a view shared by Catholics or the American public. Large majorities of Catholic voters support coverage for abortion care in healthcare insurance plans. A strong majority of US Catholics (68 percent) rejects the argument made by the USCCB that all Catholics should oppose healthcare reform if it includes coverage for abortion. (Belden Russonello and Stewart, 2008) A poll by the bishops themselves found that 89 percent of American adults believe that abortion should be provided in some or all cases.
American Catholics are not represented by the voices of a few bishops. To ensure the well-being of all, healthcare coverage in the PCIP should be guided by evidence, science, medicine and the needs and wishes of the American people. We urge you to listen to the majority of Americans who want access to comprehensive healthcare for all, including abortion care and access to comprehensive family planning services.

As a Catholic, I want you to know that the USCCB does not speak for me, nor does it speak for the majority of Catholics who overwhelmingly approve of access to abortion care.

Please ensure that American women—Catholic and non-Catholic alike—have access to comprehensive and affordable healthcare including abortion care.

Sincerely,

Jon O'Brien
President

CC: Secretary Kathleen Sebelius