



# Health Care Reform Bulletin

August 8, 2011

## New Women's Preventive Care Mandates for Plans Renewing On or After August 1, 2012

On August 1, 2011, the Department of Health and Human Services (HHS), released new Women's Preventive Services Guidelines which non-grandfathered group health plans renewing on or after August 1, 2012, must cover with no member cost-sharing.

These Women's Guidelines reflect the unanimous recommendations made by the independent Institute of Medicine in their July 2011 report. The new preventive services to be covered are as follows:

- Annual well-woman visits (see attached PDF for details)
- Screening for gestational diabetes
- HPV DNA testing every 3 years beginning at age 30
- Sexually-transmitted infection counseling
- HIV screening and counseling
- FDA-approved contraception methods, sterilization and counseling
- Breastfeeding support, supplies and counseling
- Interpersonal and domestic violence screening and counseling

Cost-sharing is permitted on brand name preventive drugs if a generic alternative is made available with no cost-sharing. For more details on these services, go to <http://www.hrsa.gov/womensguidelines>.

## Narrow Religious Exemption from Contraceptive/Sterilization Services

The regulations also give HHS "the additional discretion to exempt certain religious employers from the Guidelines where contraceptive services are concerned." To qualify for this narrow exemption, the religious employer organization must satisfy all four of the following:

- Its purpose is to promote religious values;
- It primarily employs persons with the same religious tenets as the organization;
- It primarily serves persons with the same religious tenets as the organization; and
- It is a non-profit organization under Internal Revenue Code section 6033(a)(1) and section 6033(a)(3)(A)(i) or (iii).

Visit <http://www.imacorp.com/hcr> to view previous Health Care Reform Bulletins.



## Invitation for Public Comments

The Department encourages public comments on the Guidelines and exemption, and will accept comments until September 30, 2011. If you would like to make your voice heard, go to [www.regulations.gov](http://www.regulations.gov), click the "submit a comment" link, enter CMS-9992-IFC2 as the "keyword," and choose to submit your comment to HHS. All comments submitted will be published in their entirety, including commenter name and organization, to the Department's website for public viewing (anonymous submissions are accepted).

Please contact your IMA Benefits representative if you have additional questions.