



INTERNATIONAL COMMUNITY HEALTH SERVICES

Administration
412A Maynard Ave S
3rd Floor
Seattle, WA 98104
Tel: 206.788.3650
Fax: 206.490.4011

September 25, 2008

Secretary Michael O. Leavitt
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

RE: 'Provider Conscience Regulation,' RIN 0991-AB48

Finance Office
508 Maynard Ave S
Seattle, WA 98104
Tel: 206.788.3600
Fax: 206.652.5216

Dear Secretary Leavitt:

On behalf of International Community Health Services (ICHHS), I am writing to express opposition to the "provider conscience" regulation that was formally proposed by the U.S. Department of Health and Human Services (HHS) on August 26, 2008. If adopted, this regulation could impede access to basic health care services for the traditionally underserved population by diverting resources away from patient care.

Holly Park Medical
& Dental Clinic
3815 S Othello St
2nd Floor
Seattle, WA 98118
Tel: 206.788.3500
Fax: 206.788.3521

ICHHS is a federally-qualified community health center. We provide medical, dental, and behavioral health services to nearly 16,000 unduplicated patients each year. Low-income and uninsured men and women rely on our clinics for basic health information and services.

International District
Medical & Dental
Clinic
720 8th Ave S
Suite 100
Seattle, WA 98104
Tel: 206.788.3700
Fax: 206.788.3706

ICHHS is opposed to this proposed rule because the federal laws already enacted (i.e. the Church Amendments, Public Health Service Act, Weldon Amendments, and Title VII) do protect individuals who refuse to perform or assist in the performance of certain health service or research activities from discrimination. The proposed rule is unnecessary.

Additionally, the proposed rule diverts valuable resources from patient care and services because it would require increased administrative activities. At a time when funding for community clinics is scarce, requiring recipients of HHS funds to implement written certification of compliance for itself and any sub-recipients is a needless burden. It only serves to take resources from patient care and services.

International District
Pharmacy
710 8th Ave S
Seattle, WA 98104
Tel: 206.788.3770
Fax: 206.788.3706

As a safety-net clinic, ICHHS and other clinics like ours is often a place of last resort for the low income and uninsured patients. We must ensure that they receive health care services and information in the most safe and efficient way. I urge you to withdraw the proposed rule.

Sincerely,

Teresita Batayola
CEO

Mailing Address
PO Box 3007
Seattle, WA
98114-3007