



Dr. Raymond Zastrow  
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December 21, 2009

Office of Health Plan Standards and  
Compliance Assistance  
Employee Benefits Security Administration, Room N-5653  
United States Department of Labor  
200 Constitution Avenue, NW  
Washington D.C. 20210

Attention: RIN 1210-AB27

To Whom It May Concern:

We offer this letter in response to the Request for Information on Title I of the Genetic Information Nondiscrimination Act of 2008 (GINA) interim final rules on employer-sponsored wellness and disease management programs and respectfully request that you rescind the regulations.

We write to express our grave concerns regarding the negative impact that the interim final rules will have on our ability as employers to continue to foster a culture of health and wellness in the workplace. Quad/Graphics is an employer which not only sponsors but which has worked diligently for over two decades to engage our employees in many diverse ways to lead healthier lifestyles. Among our most successful initiatives has been our *Lean You!* incentivized wellness program delivered at the workplace in concert with our on-site QuadMed primary care clinics. In addition to patient-centered primary care, we sponsor fitness, prevention, wellness and disease management programs. These activities are initiated by our employees and their spouses annually during "open enrollment" as they confidently share their family histories in a private and secure fashion via an on-line Health Risk Assessment (HRA).

The securely collected of HRA data is used to appropriately personalize the recommendations that QuadMed health-care providers make to Quad/Graphics' employees for health promotion and disease surveillance. With a twenty year track record of taking this focused approach to prevention and wellness, we have not only identified numerous chronic conditions early and reduced their impact at the individual and population level, but every year we identify several cancers in their pre-symptomatic phase and have saved lives as a result. But the success of *Lean You!* at both the individual and population (i.e. company) level is highly dependent upon participation, beginning with the HRA, which in turn is driven by incentives.

If we may clarify any of the issues we raise in this letter, please do not hesitate to contact us.

Sincerely,

Joel Quadracci  
*President and CEO*  
*Quad/Graphics*

Raymond J. Zastrow, M.D.  
*President*  
*QuadMed*



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