



We agree with the protection offered by GINA, but the published regulations have the perverse effect of not allowing us to find those at highest risk. Caterpillar people will likely die of colon cancer because of these regulations.

Impact of the regulation: Most employees need to be encouraged to complete an HRA and to start to participate in a program of healthy living; financial incentives provide a key motivational trigger. The interim final regulation under Title I of GINA would decimate our wellness programs by precluding our ability to provide a financial incentive to individuals who complete an HRA that requests family medical history and to provide rewards to employees for meeting certain health-related goals. If this regulation is allowed to be implemented, completion rates of HRAs will suffer significantly, and participation in wellness programs will plummet.

The regulation will also hamstring our ability to guide employees into disease management programs based on information provided in an HRA.

In conclusion: Wellness, prevention, and disease management programs are one of the few avenues available to us to help control our soaring healthcare costs. Moreover, these are programs that generally are met with enthusiasm by our employees, who are often relieved to be encouraged to lead a healthier lifestyle. Some employees are especially grateful to have completed an HRA and to have found out for the first time that they are at risk for certain diseases and that there are steps they can take to minimize their vulnerability. Making our tasks in this regard more difficult, such as by preventing the use of financial incentives to garner family medical history in an HRA, is an incomprehensible action in view of the dire necessity of holding down medical costs and encouraging individuals to assume more active control of their health.

We appreciate this opportunity to provide comments and would be happy to further discuss our concerns with you.

Sincerely,

*Anna M. Hagg, RA/JOHN*