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Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services Under the Patient Protection and Affordable Care Act

**Comment On:** EBSA-2010-0018-0001

Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Coverage of Preventive Services Under the Patient Protection and Affordable Care Act

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## General Comment

I am writing to urge the legislators to require coverage of tobacco dependence services by public and private insurers. The coverage must include all first line treatments for tobacco dependence including the nicotine replacement patch, gum, lozenge, nasal spray, inhaler and varenecline(Chantix) and bupropion(Zyban and Wellbutrin) as well as individual and group counseling. Deciding which medication to use or which combination of medications to use must be determined by the tobacco dependence health care provider in collaboration with the client seeking services. Deciding whether to use individual or group counseling must also be determined by the tobacco dependence health care provider in collaboration with the client seeking services. It is well known that tobacco dependence treatment must address a combination of pharmacologic, social, behavioral, and emotional factors. The first appointment must be 1 hour to allow the provider to assess the client's needs and to determine an appropriate plan of care. Subsequent individual or group sessions must be 30 minutes or 1 hour in length. It may be necessary for the client to have four to six subsequent visits to adjust medications and enhance motivation and add to behavioral strategies. A recent Penn State University study has shown that this intensive counseling saves much more than it costs to the health care system. In looking at the cost of a pack of cigarettes the authors noted that,

"A pack of cigarettes sells at an average retail price of \$5.51 in the U.S. When researchers added up the combined medical costs and workplace productivity losses attributable to a single pack of cigarettes consumed, the overall cost to society came to \$18.05 per pack."

In addition they found a significant savings for every dollar spent on tobacco dependence treatment.

"The analysts looked at "baseline" results, meaning the most common findings across all research studies for the level of effectiveness of a cessation treatment. Each medication option provided with counseling represents resulted in a positive return on investment – from 2 cents per every dollar spent, up to 87 cents per every dollar spent. The entire article can be found at: [www.lungusa.org/cessationcoverage](http://www.lungusa.org/cessationcoverage).

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