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Group Health Plans and Health Insurance Coverage Rules Relating to Status as a Grandfathered Health Plan Under the Patient Protection and Afforable Care Act

Comment On: IRS-2010-0010-0001
Group Health Plans and Health Insurance Coverage: Interim Final Rules for Relating to Status as a Grandfathered Health Plan under the Patient Protection and Affordable Care Act

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Submitter Information

Name: James M Chandler
Address:
6353 Center Drive
Norfolk, VA, 23502
Email: chandler@vaems.org
Phone: 757-963-0632
Organization: Tidewater EMS Council, Inc.

General Comment

I have reviewed the letter sent to you by the American Society of Association Executives and fully concur with their description of their "typical" member (which exactly describes our organization with 12 full time employees) and their concerns about the gap of time before the exchanges become available to small business, and potential loss of benefits and/or significant cost increases should we need to alter our existing health insurance plan in the interim.

I fully concur with and recommend your full consideration of their recommendation: "We would suggest for the transition period before the Exchange is established, that small and medium sized employers be allowed to make cost saving changes to copayments and cost sharing provided they do not reduce the per-employee amount they pay for insurance. This could help these organizations adjust and preserve coverage in anticipation of greater reform and options that will occur beginning in 2014. We also suggest that small and medium sized employers be allowed to change insurance carriers prior to 2014 and have their plans treated as grandfathered plans provided they do not reduce the per-employee amount they pay for insurance. This would allow them to maintain the level of coverage for employees, but reap the benefit of a less expensive plan prior to the implementation of the Exchange."

Thank you.