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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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Comment on FR Doc # 2010-14488

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General Comment

See attached file(s)

Attachments

IRS-2010-0010-0520.1: Comment on FR Doc # 2010-14488

Concerning the new Patient Protection and Affordable Care Act (PPACA) and the grandfathered in clauses:

The Rule needs to be clear, reasonable, and with no ambiguities involved in determining whether a group health plan is "in or out."

The Massachusetts health care initiative has proven what can occur when you establish the processes to improve access but fail to restructure the health care delivery mechanism itself.

While we understand the difficulty involved in making change, creating another large sub-population of excluded individuals will only add to costs, increase confusion, and mitigate the potential impact of the legislation. This only adds to the uncertainty surrounding the $143 billion in deficit reduction projected by the CBO when the process began.

Every effort should be made to remain fair to individuals and employers, but the focus should be on a strategy that results in fewer grandfathered plans, establishes perfectly clear and simple rules, minimizes the risk of further market segmentation, and avoids further confusion for the employer and the consumer.