PUBLIC SUBMISSION

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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 Affordable 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: Joseph Polanco
Address:
1349 Empire Central, Suite 220
Dallas, TX, 75247
Email: joep@piamidam.org
Phone: 214-630-8871
Fax: 214-688-1767
Organization: PIA MidAmerica

General Comment

As a small business, and trade association representing small business, we are very concerned about the Grandfathering aspects of the legislation. We are already seeing carriers increasing rates by double digits -- and in instances like ours over 40%. Consequently, firms are forced to change coverages and cost sharing; otherwise we will not be able to operate profitably and take care of our customers -- and maintain our employment base.

In this environment of escalating medical costs, as well as carriers aggressively re-pricing, it's not realistic to assume that small business will be able to take advantage of any grandfathering.