

May 11, 2010

Office of Consumer Information and Insurance Oversight.
Department of Health and Human Services
Attention: OCIIO, 4150-IFC
PO Box 8016
Baltimore, MD 21244-1850

Re: **Remarks/Comments on:**
Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to
Dependent Coverage of Children to Age 26 under the Patient Protection and Affordable Care Act

II, Overview of Regulations. A. PHS Act Section 2714...

1. An example of the application of transition rules includes: An eligible child with parent not currently enrolled. Plan must provide an opportunity to enroll the parent in addition to the child.

PLEASE RECONSIDER. You already make plan providers and employers responsible for family welfare choices that belongs to the parent for persons dependents who are not legal adults. It is already unreasonable that I, as an employer, must know and spend time and other company resources (in my case customer utility payments) tracking non-adult dependents of employees to be prepared for aging-out coverage issues and COBRA. Now you are adding the need to further track, inform, and enroll for several more years.. An employer's first responsibility should be to its employees.

My suspicion for the reason for enrollment under and employee's plan until age 26 is that these are the healthiest persons, for which insurers receive considerable \$ with very little involvement or medical activity. This is no doubt one of the *quid pro quo* items from the health care industry traded for the federal government's requiring other healthcare program changes that are more costly to these governments.

This will add to the cost of doing business for all employers. Plan on prices and costs of service going up, and don't you dare complain about it.

2. An example of the of the application of transition rules includes: A child under age 26 who is on COBRA must be given the opportunity enroll as a dependent of an active employee, and has another COBRA qualifying event occur at age 26.

Would not a simpler option be to adjust the cost of the COBRA coverage (which is already the same as employee coverage, only including a 2% fee), and require the employer to pay this until the child ages out at 26? At age 26 adjust the COBRA date and change the billing address.

3. It should be the choice of the young adult at age 26 to go without, or find opportunities for other coverage at that time. The government plan will ultimately, ensure coverage even with pre-existing conditions. When does adulthood arrive? When does a person take on responsibility for his/her own care? Why are children at age 21 not all provided the personal opportunity – or requirement – to enroll in something on their own rights? Why are employers being placed in the position of being Great Mama?

4. For employers who pay a significant portion of dependent premium coverage products and services will be affected, since more of the employers' budget could easily be going to dependent premiums.