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To: [E-OHPSCA1251.EBSA](#)
Subject: Comments for RIN 1210-AB42
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Statement of the
Independent Bakers Association
Interim Final Rules for Group Health Plans and
Health Insurance Coverage Relating to Status as a Grandfathered Healthcare Plan Under the
Patient Protection and Affordable Care Act
RIN 1210-AB42

The Independent Bakers Association (IBA) is pleased to submit the following comments in response to the Department of Labor's Employee Benefits Security Administration; the Department of Human and Health Services' Office of Consumer Information and Insurance Oversight; and the Department of the Treasury's Internal Revenue Service request for comments on the Interim Final Rules for Group Health Plans and Health Insurances Coverage Relating to Status as a Grandfathered Healthcare Plan Under the Patient Protection and Affordable Care Act. IBA request that the rules outline for keeping grandfather status of a health care plans be loosen.

IBA is a Washington DC based national trade association of approximately 400 mostly family-owned wholesale regional and national bakeries and allied members of the baking industry. The association was founded in 1967 and:

- Protects the interests of independent wholesale bakers from anticompetitive mergers and acquisitions.
- Encourages Congress to support market-oriented farm commodity programs.
- Seeks support of responsible federal labor, tax and environmental proposals and laws.

IBA is concerned that the rules laid out for a business to keep a healthcare plan grandfathered are too strict and do not allow small business the flexibility they need. Members of IBA are worried that a common increase in deductibles, co pays, or a reduction in benefits would be ruled a considerable change to the plan and cause the business' health care plan to lose its grandfathered status. To prevent losing this status, our members will be forced to take on many of the additional cost of the plan going into the future.

The current health care law already threatens to stymie economic growth with provisions that would require business-to-business transaction adding up to \$600 or more a year to be reported to the IRS. IBA believes, as the US Chamber of Commerce does, that businesses will try to reduce data collection and paperwork by cut back on the number of other businesses they work with and refuse to propagate new business connections. These strict Grandfather guidelines will only put further burden on businesses.

Without the needed flexibility, these added cost will likely drive small businesses to either cut workers, or refrain from hiring. Small business make up the majority of jobs in America and these restrictions will severely curtail economic growth. IBA request more flexibility in these rule.

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