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August 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: OCIIO- 4150-IFC

Dear Sir or Madam:

The Children's Cause for Cancer Advocacy respectfully submits these comments regarding the Interim Final Rules for Group Health Plans and Health Insurance Issuers Related to Dependent Coverage of Children to Age 26. This provision of the Patient Protection and Affordable Care Act is important to young adult cancer survivors who all too often find themselves with limited or no options for health insurance coverage. Therefore, we appreciate the Administration's work to develop rational rules to implement the provisions of the new law related to coverage of dependents to age 26, as well as your efforts to encourage voluntary action by insurers to offer dependent coverage in advance of the effective date of September 23, 2010.

Cancer strikes an estimated 12,500 children under age 15 each year. The good news is that, due to significant progress in the past 30 years, many children do survive. However, two thirds of the 270,000 childhood cancer survivors among us will experience at least one serious late health effect caused by their disease and the toxic treatments they endured. As a result, their quality of life is impaired, and their lifespan is shortened.

Clearly, childhood cancer survivors have significant and unique health care needs. For many young adults who are survivors, the option of securing coverage through a parent's health insurance plan is critical to their ability to receive affordable, appropriate follow up care.

Straightforward implementation of the Dependent Care Coverage provision, as outlined by the Interim Final Rules, will assist these individuals as they seek to improve their health care coverage under a parent's plan beginning September 23, 2010. We appreciate that the rules:

- Clarify that eligibility for coverage of a dependent under age 26 depends solely on the relationship between the child and participant in the plan, not financial dependency or other qualifiers currently used in the marketplace;
- Require plans to provide young adult children with the same benefits provided to similarly situated individuals at the same price, thereby promoting access to quality, affordable coverage;
- Require that insurers and employers notify young adults of their continued eligibility and provide them 30 days to take advantage of the coverage opportunity, allowing adequate time to enroll; and
- Allow a parent to switch their benefit package to another available option so that the child has access to the most appropriate benefit package for which they are eligible.

Again, we believe that this opportunity for young adult survivors of childhood cancer to secure quality health benefits is significant. Implementation of the new law in a manner that gives those individuals who are eligible a fair chance to access this coverage will make the provision meaningful and help more childhood cancer survivors secure appropriate care that meets their needs. If we could recommend one improvement in the rules, it would be to address the issue of providing adequate notification when dependent care coverage will be terminated to allow for transition to a new plan.

We appreciate your hard work, and will monitor the impact of this new law with great interest and concern for how it affects the health care needs of childhood cancer survivors. Thank you for the opportunity to share our perspective.

Sincerely,

Lou G. Salley