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LEGAL PROCESSING DIVISION  
PUBLICATION & REGULATIONS  
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# PUBLIC SUBMISSION

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**Docket:** IRS-2010-0010

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

**Document:** IRS-2010-0010-0920

Comment on FR Doc # 2010-14488

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## Submitter Information

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**Submitter's Representative:** William Daley

**Organization:** Health Rights Organizing Project

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## General Comment

Thank you for the chance to comment. Please see attached.

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## Attachments

**IRS-2010-0010-0920.1:** Comment on FR Doc # 2010-14488

# Health Rights Organizing Project

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From: Health Rights Organizing Project  
Community Organizations in Action  
The Northwest Federation of Community Organizations

To: Department of the Treasury -- Internal Revenue Service  
Department of Labor -- Employee Benefits Security Administration  
Department of Health and Human Services

**Re: 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**

Document ID: HHS-OS-2010-0015-0001

Docket ID HHS-05-2010-0015

Thank you for the opportunity to comment on these proposed rules.

Because Grandfathered Health Plans will not have to meet many of the regulatory protections required of other plans under the Patient Protection and Affordable Care Act, it is critical that consumers be given a clear understanding of what their status is under these plans. In order to give this information the widest possible exposure, we recommend that your rules do the following:

- Establish a registry of all grandfathered plans.
- Maintain and make available to the public consumer-oriented information detailing federally-based and state-based consumer protections that are available for those with grandfathered plans.

For individuals who continue to receive their health care coverage through Grandfathered Health Plans, it is important that these consumers have a clear understanding of their status and rights. We recommend that the rules:

- Require insurance companies and employers to notify policyholders that their coverage is grandfathered with an explanation of what health reform benefits do not apply because of the plan's grandfathered status.

The Health Rights Organizing Project - A joint project between the Northwest Federation of Community Organizations

and the Center for Community Change

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# Health Rights Organizing Project

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Unless there are clear and well enforced limits on what changes Grandfathered Health Plans can make in policies, consumers will be trapped in plans that decline in value to them, leaving many underinsured. We urge that the rules:

- Establish clear criteria for determining when changes to health plans are significant enough to terminate grandfather status.

Because we regard it as problematic that Grandfathered Health Plans are not required to comply with the same consumer protections and insurance regulation standards applied to other plans under the Patient Protection and Affordable Care Act, we recommend

- That these rules not interfere with the right of states to impose added consumer protection and insurance regulation as their laws allow.

Contact our organizations via:

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3518 Edmunds Street  
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