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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

General Comment

Section 2711 applies to grandfathered group plans. This means that the highest annual limit that the grandfathered group plan could have is \$750,000. Section 1251 gives various scenarios as to ensure retention of grandfather status. If a grandfathered grup health plan had a \$1 million lifetime limit and no annual limit, does that plan need to set its new annual limit at no less than \$1 million to keep its grandfather status even though Section 2711 applies to it?