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Group Health Plans and Health Insurance Coverage Rules Relating to Status as a Grandfathered Health Plan Under the Patient Protection and Affordable Care Act

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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

Name: Mary Margaret Collins**Address:**

C/O Media Financial Management Association
550 West Frontage Road, Ste. 3600
Northfield, IL, 60091

Email: mary.collins@mediafinance.org**Submitter's Representative:** President & CEO**Organization:** Media Financial Management Association

General Comment

On behalf of Media Financial Management Association (MFM), we appreciate the opportunity to comment on the Interim Final Rules regarding grandfathered health plans under the Patient Protection and Affordable Care Act. MFM is a section 501(c)(6) individual membership organization with four full-time employees. Our for-profit subsidiary employs another four people. We face the same obstacles to obtaining good, affordable health insurance coverage confronting small businesses in general. We are captive to a small number of health insurance providers, and do not have the economic clout of larger enterprises.

We purchase health insurance for our employees that is fully insured; we do not have the resources or ability to self-insure as a means to control our health insurance costs and benefits. MFM will greatly benefit from the expanded options for health insurance that will be available beginning in 2014 through the Exchange. The Exchange will allow the small and medium-sized organizations that our members represent to benefit from the economics of pooling that is not currently available.

We are concerned that Interim Final Rules as currently drafted may force us to make the difficult and undesirable choice of canceling health care coverage if grandfather status is revoked, especially before the Exchange is in place.

We would suggest for the transition period before the Exchange is established, that small and medium sized employers be allowed to make cost saving changes to copayments and cost sharing provided they do not reduce the per-employee amount they pay for insurance. This could help us and other organizations adjust and preserve coverage in anticipation of greater reform and options that will occur beginning in 2014. We also suggest that small and medium sized employers be allowed to change insurance carriers prior to 2014 and have their plans treated as grandfathered plans provided that provided they do not reduce the per-employee amount they pay for insurance. This would allow them to maintain the level of coverage for employees, but reap the benefit of a less expensive plan prior to the implementation of the Exchange.

Thank you for allowing us to express our views.