

LEGAL PROCESSING DIVISION
PUBLICATION & REGULATIONS
BRANCH

REG-118412-10

AUG 5 2010

PUBLIC SUBMISSION

As of: August 05, 2010 Received: August 04, 2010 Status: Posted Posted: August 05, 2010 Tracking No. 80b290f0 Comments Due: August 16, 2010 Submission Type: Web

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-2010-0010-0024

Comment on FR Doc # 2010-14488

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General Comment

August 4, 2010

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Department of Health and Human Services
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200 Independence Ave. SW
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Re: OCIO-991-IFC, The Interim Final Rules for Group Health Plans and Health Insurance Coverage Relating to Status as a Grandfathered Health Plan Under the Patient Protection and Affordable Care Act

On behalf of the American Society of Association Executives (ASAE), we appreciate the opportunity to comment on the Interim Final Rules regarding grandfathered health plans under the Patient Protection and Affordable Care Act. ASAE is a section 501(c)(6) individual membership organization of more than 22,000 association executives and industry partners representing nearly 12,000 tax-exempt organizations. Its members manage leading trade associations, individual membership societies, and voluntary organizations across the United

States.

It is important to note that most of our members are small and medium sized tax-exempt organizations. In fact, the average association has 11 employees and has the same obstacles to obtaining good, affordable health insurance coverage confronting small businesses in general. The organizations that our members represent are often captive to a small number of health insurance providers, and do not have the economic clout of larger enterprises.

The vast majority of the organizations represented by our members purchase health insurance for their employees that is fully insured. They generally do not have the resources or ability to self-insure as a means to control their health insurance costs and benefits. Most of these organizations 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.