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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

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

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General Comment

On behalf of the American Association of Neuromuscular & Electrodiagnostic Medicine (AANEM), I appreciate the opportunity to comment on the Interim Final Rules regarding grandfathered health plans under the Patient Protection and Affordable Care Act. AANEM is a section 501(c)(6) individual membership organization of 5000 members. We have a staff of 16.

Our insurance costs have become a huge problem for us. We had one staff member who had a very expensive montly prescription for a rare disease. As a result, our insurance cost for all or our employees are at the highest possible level allowed by law. Although this employee has left AANEM, it will be years before the current insurance company will reduce our expenses. We are forced to switch to another plan in the coming months in an attempt to lower our insurance costs. We currently pay 100% of an employees costs. We also will be reviewing this.

I would suggest for the transition period before the Exchange is established, that small and medium sized employers, such as AANEM, be allowed to make cost saving changes to copayments and cost sharing provided I do not reduce the per-employee amount we pay for insurance. This could help organizations like mine adjust and preserve coverage in anticipation of greater reform and options that will occur beginning in 2014. I also suggest that small and

medium sized employers be allowed to change insurance carriers prior to 2014 and have the plans treated as grandfathered plans provided that provided they do not reduce the per-employee amount they pay for insurance. This would allow organizations like mine 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 this opportunity to express our views on this important issue.

Shirlyn Adkins, JD
AANEM Executive Director