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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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Organization: MARYLAND RETIRED SCHOOL PERSONNEL ASSN.

General Comment

TO: Office of consumer Information and Insurance Oversight
 Department of Health and Human Services

RE: OCHO-991-IFC, The Interim 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 Maryland Retired School Personnel Association (MRSPA), a section 501 (c) (4) individual membership organization, with four employees, I am writing to express my concern, as executive director that during the interim period between now and 2014, when the health insurance Exchange will be available, small employers continue to have options to make changes in their employee insurance, in regard to copays and cost sharing. Our organization currently has two of the four employees covered with the small employer insurance through CareFirst BlueCross/Blue Shield. Although we are pleased with our insurance coverage, the premium costs continue to increase on an annual basis. We examine the coverage and the premiums and make changes, including increasing copays and deductibles in order to continue to offer full coverage. If we are not able to do that in the future, we may be forced to greatly reduce the coverage, or cancel it completely.

We look forward to the establishment of the Exchange in 2014, but we must continue to offer coverage in the interim.

Thank you for the opportunity to express my view on this important issue.

Judith Zahren, Executive Director
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