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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

Document: IRS-2010-0010-0809

Comment on FR Doc # 2010-14488

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General Comment

August 13, 2010

Office of Consumer Information and Insurance Oversight

Department of Health and Human Services

Attention: OCIO-9991-IFC

P.O. Box 8016

Baltimore, MD 21244-1850

Re: Interim Final Rule for Group Health Plans and Health Insurance Coverage Relating to Status as a Grandfathered Health Plan Under the Patient Protection and Affordable Care Act (PPACA). The Department of Health and Human Services (HHS) rules for determining whether an insurance plan will be granted "grandfathered" status are a serious concern to everyone covered by these rules. If an insurance plan is "grandfathered" it may determine whether it must comply with certain provisions of the Patient Protection and Affordable Care Act (PPACA), including the non-discrimination provision. The non-discrimination provision ensures that insurance plans cannot discriminate against providers with respect to participation and coverage if the providers are acting within their scope of practice. The population should be free to make choices based on

what is the best "health tool" for a given job. If the point of this legislation is to change health care coverage for the better – which it must be – then it is incumbent on you to actually make those changes. If insurance companies are doing the right thing, there should be no need to "grandfather" anyone. Let's keep the non-compliant insurance firms in line with the spirit and letter of the changes.

The Rule needs to be clear, reasonable, and with no ambiguities involved in determining whether a group health plan is "in or out." The decisions the federal government makes today will determine the outcomes for tomorrow. We may need to make some difficult decisions to create a sustainable health care system that will support a growing economy in the future. That means getting as many citizens across the country participating at the beginning to make it work and to deliver on its promises, in order to retain their support.

Thank you for the opportunity to comment on this regulation.

Robert M. Copp