

SEP 9 2010

REG-118412-10

LEGAL PROCESSING DIVISION
PUBLICATION & REGULATIONS
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**PUBLIC
SUBMISSION**

As of: September 09, 2010 Received: August 16, 2010 Status: Posted Posted: September 09, 2010 Tracking No. 80b32695 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-2010-0010-0944

Comment on FR Doc # 2010-14488

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Organization: American Staffing Association

General Comment

The American Staffing Association represents the nation's temporary staffing firms, which employ approximately nine million temporary and contract employees annually. Most of those firms offer health benefits.

Our member firms have raised concerns that their insurance carriers are unilaterally making changes to the firms' current health plans that would cause those plans to lose grandfather status under the proposed regulations.

We believe it is inappropriate for insurance carriers to deprive their insureds' health plans of grandfather status without the consent of the insured. Therefore we request that the regulations provide that loss of grandfather status will result only as a consequence of decisions or actions taken by the insured, not the unilateral actions of the insurance carriers.