

SEP 9 2010

REG-118412-10

LEGAL PROCESSING DIVISION  
PUBLICATION & REGULATIONS  
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<b>As of:</b> September 09, 2010 <b>Received:</b> August 16, 2010 <b>Status:</b> Posted <b>Posted:</b> September 09, 2010 <b>Tracking No.</b> 80b32598 <b>Comments Due:</b> August 16, 2010 <b>Submission Type:</b> Web
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**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-2010-0010-0919

Comment on FR Doc # 2010-14488

## Submitter Information

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**Government Agency Type:** State

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## General Comment

1. Clarify the meaning of the term "substantially" in reference to the elimination of benefits (page 20).
2. Regulation does not provide a time period for maintaining grandfathering records (page 15)-- suggest require plans/employers/insurers to maintain records documenting grandfather status for five years.
3. Clarify whether a grandfathered plan is the health benefit plan issued to an individual or group health plan, or if it is an insurance product marketed by an insurer as of March 23, 2010. Or, whether it is all of the above.
4. Clarify whether insurer/employer should maintain documentation that verifies an individual or employer (or bona fide association) elected to retain the health benefit plan in effect on March 23, 2010