General Comment

Section 2711 applies to grandfathered group plans. This means that the highest annual limit that the grandfathered group plan could have is $750,000. Section 1251 gives various scenarios as to ensure retention of grandfather status. If a grandfathered group health plan had a $1 million lifetime limit and no annual limit, does that plan need to set its new annual limit at no less than $1 million to keep its grandfather status even though Section 2711 applies to it?