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Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Internal Claims and Appeals and External Review Processes Under the Patient Protection and Affordable Care Act

**Comment On:** EBSA-2010-0019-0001

Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Internal Claims and Appeals and External Review Processes Under the Patient Protection and Affordable Care Act

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## General Comment

The Interim Final Rules for these appeal procedures will only result in health insurance plans raising their member premiums to cover the costs to comply with this regulation. The IFR should be modified significantly to provide members with a full and fair review of their denied adverse benefit determination.