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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

This IFR requires health plans issuers to limit the internal appeals process to only one level. However, group health plans may continue to have two levels. Why not apply the same limit on group health plans as well for consistency?

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