

REG-114494-10

AUG 5 2010

PUBLIC SUBMISSION

As of: August 05, 2010 Received: August 04, 2010 Status: Posted Posted: August 05, 2010 Tracking No. 80b29586 Comments Due: August 11, 2010 Submission Type: Web

Docket: IRS-2010-0011

Group Health Plans and Health Insurance Issuers Providing Dependent Coverage of Children to Age 26 under the Patient Protection and Affordable Care Act

Comment On: IRS-2010-0011-0002

Group Health Plans and Health Insurance Issuers Relating to Dependent Coverage of Childrer to Age 26, etc.

Document: IRS-2010-0011-0010

Comment on FR Doc # 2010-11391

Submitter Information

Name: Unknown 3

Address: AK

General Comment

State law currently requires that we cover children and stepchildren, but it also requires we cover 'other children' who live with the member in a parent-child relationship. This could include grandchildren, neices, nephews, or any other child. The only way we have of determining the parent-child relationship for someone who is not a member's actual child is through residency or support tests. May residency and support tests be used to determine a parent-child relationship for coverage that is above and beyond the coverage of a member's 'child'? If this is not allowed, then we would have to cover anyone a member chose to cover, no matter what the relationship, or we would be forced to try to change the state statute to exclude the 'other' children, which would have a negative impact.

If we are forced to change our statute and rules to exclude anyone but children and step-children because there is no way to validate the parent-child relationship, would this jeopardize grandfather status?