## **PUBLIC SUBMISSION**

**As of:** August 12, 2010 **Received:** May 28, 2010

**Status:** Posted

**Posted:** June 09, 2010 **Tracking No.** 80af6013

Comments Due: August 11, 2010 Submission Type: Unknown

**Docket:** HHS-OS-2010-0012

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

Comment On: HHS-OS-2010-0012-0001

Group Health Plans and Health Insurance Issuers Relating to Dependent Coverage of Children to

Age 26, etc.

**Document:** HHS-OS-2010-0012-0003 Comment on FR Doc # 2010-11391

## **Submitter Information**

Name: Gary Goff

Organization: Oklahoma State & Education Employees Group Insurance Board

## **General Comment**

We are a self-insured state health plan and we currently allow members to cover children who are not their own natural, adopted, or step children if the member shows that they are living with the child in a normal parent-child relationship. While natural, adopted, or step children do not have residency or financial support requirements, we know of no other way to demonstrate the parent-child relationship for the other children that members are allowed to cover. Is it permissible to use residency and financial support criteria for determining eligibility for these dependents that are not the member's child? If no support criteria are allowed, there may be no alternative but to restrict eligibility to the member's own child.