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Group Health Plans and Health Insurance Coverage: Interim Final Rules for Relating to Status as a Grandfathered Health Plan under the Patient Protection and Affordable Care Act

Comment On: HHS-OS-2010-0015-0012

Group Health Plans and Health Insurance Coverage: Status as a Grandfathered Health Plan Under the Patient

Protection and AffordableCare Act

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Submitter Information

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General Comment

Thank you for allowing employers to be able to change insurance carriers and maintain their grandfathered status so long as it has not made any other changes that would revoke its status. However, the prospective nature of this amendment adversly affects group health plans that changed health insurance carriers with effective dates prior to November 15, 2010. Please consider extending the amendment to all employers who may have changed health insurance carriers between March 23, 2010 and November 15, 2010 but made no other changes that would cause a loss of grandfathered status.