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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

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General Comment

I administer our self-fund health plan.

After attending a dozen seminars on health care, after talking with hundreds of employers, after reading 33 pages of government regulations, I concur with the unanimous conclusion that the proposed health care bill is designed (deliberately?) to end employer sponsored health plans. The comment, "If you like your employer's plan, you can keep it", sounds comforting; however, the reality is there will be no plan to keep. Employers are being set up to fail.

Maintaining grandfathered status will be difficult (or impossible). As an example, the mandatory coverage of young adults to age 26 and changes to the mental health parity act is projected to increase our premiums 3-7%. When we are forced to adjust premiums to compensate for the added federal requirement, we will likely lose grandfather status.

Our health plan has not had an increase in premiums, co-pays, deductibles, OOP, in three years. By the government's own admission there will be added cost increases for employers. Knowing what employer's will be facing, the government then states we will lose grandfather status if we make changes that are necessary to keep our plan viable.

By the government's own calculations, "45 percent of large employer plans will relinquish their grandfather status by the end of 2013". Does that sound like the government wants employer's to maintain coverage? Employers are in a no win situation and the government knows this.

The government needs to stop and reconsider instead of charging ahead like a "bull in a china shop".