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Group Health Plans and Health Insurance Coverage Rules Relating to Status as a Grandfathered Health Plan Under the Patient Protection and Afforable Care Act

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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

As the Healthcare plan administrator for my small company, I have seen our costs for group health insurance increase dramatically. We try to manage costs by making adjustments to plan design including adjusting deductibles, copays and the like, or bidding out our contract to other carriers. We moved to an HRA plan in 2009.

Now we are concerned that these cost management techniques will be impossible to employ and still maintain grandfathered status. We offer an excellent plan to our employees which includes most of the new mandated provisions such as full coverage for annual check-ups and routine diagnostic tests. However, as a small group our broker tells us to expect a 20 - 35% increase in premiums for the 2011 calendar year.

If small plans such as ours were able to bundle together into an employer health insurance exchange, we feel our costs could be better managed, and we could have more leverage with the insurance carriers as our risk pool would be larger.

We urge Congress to make Insurance Exchanges for small businesses a reality.