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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 Affordable 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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Submitter Information

Name: Daren Coppock**Address:**

1156 15th St. NW

Suite 302

Washington, DC, 20005

Email: dcoppock@aradc.org**Phone:** 202-457-0825**Organization:** Agricultural Retailers Association

General Comment

We are a small staff membership association serving agricultural retailers across the country, and I'm writing in support of the request by the American Society of Association Executives (ASAE) concerning this rule. ASAE has asked HHS to allow small and medium associations to keep their grandfathered status until 2014, even if they change insurance companies, as long as they do not change the per-employee amount they pay for insurance. By giving an exemption until the exchanges are created, many associations can avoid crippling insurance cost increases while still providing an important benefit to their employees. Health care costs are a significant part of our personnel budget and without some way to protect our grandfathered status, these costs are likely to spiral out of control.