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*Notice 2015-52*

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**From:** Russell Localio <rlocalio@mail.med.upenn.edu>  
**Sent:** Wednesday, September 30, 2015 2:02 PM  
**To:** Notice Comments  
**Subject:** Notice 2015-52

With regard to Notice 2015-52 for developing regulatory guidance on the implementation of 26 USC section 4980I.

How will the provisions for age and gender adjustments (Notice section VI) be applied to employee dependents who are covered by the employee's policy? The statute and Notice appear to be silent on age\*gender adjustment for insured individuals. Rather they focus on age\*gender differences of "employees"? How will the regulatory guidance reflect difference in the number and age\*gender composition of employee families and the extent to which family size might vary across employers? If insurance costs vary across employers by virtue of the number of individuals (employees plus dependents) covered, will the applicable dollar limits adjust for those differences?

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