

Notice 2015-16

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From: WILLIAM K. FISCHER <WKFISCHER@emerywinslow.com>
Sent: Friday, May 08, 2015 10:43 AM
To: Notice Comments
Subject: Notice 2015-16

As I understand the provision for "Cadillac plan" taxation it represents a severe hardship to small groups of older employees such as ours.

Our group has had to introduce a plan (classified as "Silver") with a high deductible and an out of pocket maximum that is now double what it used to be in order to be remotely affordable to the company and the employees. This plan could hardly be considered a "Cadillac" with the onerous out of pocket expense faced by employees. Yet, the premium for most participants is well over the \$10,200 individual limit due to the age brackets.

My suggestion is twofold:

1. Provide a better definition of "Cadillac" based on amount and type of coverage provided not just cost.
2. Allow a formula based on age to raise the limit to a more reasonable amount for groups with older participants.

To have to provide a plan that is not satisfying to our employees at a very high cost and then be taxed on top of it really rubs salt into the wounds. I had been in favor of the concept of the ACA as commendable and necessary, but so far its execution has resulted in regulations that have produced higher, not lower, costs, and worse, not better, coverage, at least for our group demographic. I urge you to reconsider the implementation of the Cadillac tax provision to give consideration to the potential extraordinary negative effect for older groups.

Thank you.

William K. Fischer, President
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