Notice 2015-16

Jayco

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May 11, 2015

IRS Counsel
Internal Revenue Service
P. O. Box 7604, Ben Franklin Station
Washington DC 20044

Re: Notice 2015-16 Cadillac Tax Commentary

Dear IRS Counsel:

As an employer who has had an onsite medical clinic for more than five years, we appreciate the opportunity to provide commentary at this time. Our clinic was established and used primarily to help us manage occupational care and more recently we've opened services for urgent care for employees only. We have a strong interest in managing our overall medical plan expense while improving services for our employees. We have been strongly considering expanding medical care and wellness services to our employee's families. We were prepared to move on this initiative until we saw the government considering adding the clinic in the Cadillac tax. Just the consideration of the Cadillac tax has caused Jayco, Inc. to delay expansion of the clinic services. From our perspective the clinic's proposed inclusion in the Cadillac tax is incentivizing the wrong behavior and it should be opposed. In our view, the purpose of an onsite medical clinic is to provide cost savings to our overall medical plan and promote wellness for employees. If the cost of the clinic is included in the Cadillac tax, the overall cost of providing a competitive and comprehensive health and wellness program to employees will be restricted.

We appreciate your consideration to exclude onsite health and wellness clinics, whether providing de minimis medical care or more services, from the upcoming Cadillac tax.

Sincerely,

John W. Ganyard

John W. Ganyard
Vice President of Human Resources