

From: Tim Caldwell <tcaldwell@keystonebg.com>
Sent: Thursday, March 05, 2015 9:50 AM
To: Notice Comments
Subject: Notice 2015-16

Dear Sir/Madam:

I have read the IRS Notice 2015-16 and would like to comment on the "Cadillac Tax" and specifically some of the items that are included in the calculation. While I certainly agree the costs of the premium should be included and could even be persuaded that employer contributions to a Health Savings Account (HSA) could be included, I would like to express my strong opinion that employee contributions to an HSA made via pre-tax payroll deductions should NOT be included in that calculation. As both a professional consultant in the area of group medical plans and an employee who is covered by an HSA-compatible plan, I fail to see how money that comes out of my pocket to fund the HSA could be included in this calculation. Regardless of how the money gets from my pocket in the account, this is money that I am providing for my health care, not my employer.

I urge IRS to reconsider this position as you move toward issuing final regulations in this matter.

Thank you for considering my comments.

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