

From: Kathy von Burg <KvonBurg@sumikamaterials.com>
Sent: Friday, May 15, 2015 12:50 PM
To: Notice Comments
Subject: Notice 2015-16 - Comments from Sumika Electronic Materials, Inc.

After reviewing Section 4980I in Notice 2015-16, I would like to provide the following comments:

Section III.F (Limited Scope Dental and Vision Benefits) -

You should not consider including dental or vision benefits in the definition of Applicable Coverage. Employers will start dropping dental and vision benefits as a way to ensure the total aggregate cost of the items included in the definition of Applicable Coverage is below the \$10,200/\$27,500 Cadillac Tax threshold. Where are people going to go to purchase dental and vision insurance if employers drop this coverage? It's not available for purchase on the Exchange!

Section III.G (Employee Assistance Programs) -

You should not consider including Employee Assistance Programs (EAPs) in the definition of Applicable Coverage. EAP's are invaluable tools, many times helping individuals when they would not otherwise seek help via traditional methods. The cost of an EAP is rather low (compared to all other benefits offered), but again, it's one of the first things an employer will drop as a way to ensure the total aggregate cost of the Applicable Coverage remains below the Cadillac Tax threshold.

Section III.B (Type of Coverage Included in Applicable Coverage) -

Including HSA contributions in the definition of Applicable Coverage negates the primary intent of a High Deductible Health Plan (HDHP). These plans were introduced to help drive medical decisions to the consumer level using a Health Savings Account as the vehicle with which to have/save money for current and future medical costs. High Deductible Health Plans help consumers as it encourages them to spend their money wisely and shop around for the best rates. Too many Americans already don't save enough for their retirement or medical costs, but since my company introduced a HDHP back in 2007, we have over 70% of our employees voluntarily selecting this plan over our traditional PPO plan as they see the benefits of an HSA over an FSA (not losing money you pledged but did not use) and they think twice about going to the doctor at the first sign of sniffles.

If HSA contributions are included in the definition of Applicable Coverage, I'm afraid that High Deductible Health Plans would become a thing of the past as adding a potential \$3,350 (single) or \$6,650 (family) to the cost of the actual medical insurance premium will put many employer plans over the \$10,200/\$27,500 Cadillac Tax threshold. Employers will do away with these great HSA plans if they have to factor in another potential \$3,350/\$6,650 to the plan's cost. **Please do not include contributions to an HSA account when determining Applicable Coverage.**

Respectfully yours,
Kathy von Burg

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