

Notice 2015-16

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From: Bill Colesberry <billcole@ix.netcom.com>
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To: Notice Comments
Subject: Notice 2015-16

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Using a dollar limit as the test of whether a employer plan is a "Cadillac Plan", is not a good measure of the benefits provided under the plan. It would seem that looking at the benefits being provided by the plan would be a better way of determining whether a plan is a Cadillac Plan. In my State insurance companies are required to file with the State the plans they offer and the cost range of those plans, so a determination could be made that based upon the benefit level rather than cost.

Why Cost doesn't work:

I work for a small employer who provides and 80/20, \$1000 deductible plan, with a \$3000 out of pocket maximum. Hospitals under the plan are tiered so that a division 2 hospital has a \$250 per day co-pay. The Rx plan has an annual deductible of \$200 for anything that is not generic. Because I work for a smaller employer (less than 100 employees) the cost of this plan is much higher than a similar plan offered to my siblings by their employers who are larger companies (more than 10,000 employees). It seems unfair that I might be subject to a tax while someone else who has the same plan is not. If my plan as described is a Cadillac Plan, then everyone who has this plan should be subject to the tax, which is why it should be benefit based and not cost.

Thank you

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