

Notice 2015-16

APR 14 2015

I am writing this post to comment on Notice 2015-2016 and the "Cadillac Tax" facing employers in 2018. I work for an engineering consulting company in Colorado, and we have approximately 450 employees. We have been offering CDHPs since the early 2000s and these plans have been fully embraced by our employees. This year 83% of our employees are enrolled in one of our two high deductible health plan options, and of those, 79.8% are contributing to an HSA plan. We have offered HSA plans for as long as we have had high deductible plans, and we achieve this high participation without an employer contribution to the HSA. Our employees see the value of the HSA and have embraced that culture of health care consumerism.

Now, with the Cadillac Tax looming, we may be forced to limit employee contributions to these plans, which in the long run could affect our ability to hire and retain employees. Our employees know the value of the HSA, and limiting our employees ability to save and pay for health care expenses seems to go against everything the ACA is meant to stand for. It shouldn't matter whether employees contribute \$500 or \$7500 to an HSA; the fact that they are good consumers of health care should be rewarded, not penalized.

I encourage you to eliminate the employee contributions to FSA and HSA plans in the calculations toward the "Cadillac" excise tax. Good consumers of health care and the employers who make this possible should not be punished for doing the right thing.

Thank you.

Holly Coffee