LEGAL PROCESSING DIVISION PUBLICATION & REGULATIONS BRANCH

Notice 2015-52

From: Sent: Chris Cronin < ChrisCronin@anbtx.com> Wednesday, August 05, 2015 12:15 PM

To:

Notice Comments

Subject:

Cadillac Tax

Ladies and Gentlemen:

I have received and read IRS Notice 2015-52 regarding the Excise Tax on High Cost Employer-Sponsored Health Coverage. While the spirit of the 'Cadillac tax' may have been to discourage employers from paying for, and claiming tax deductions on, overly indulgent coverage; this excise tax will cripple most small and medium-sized employers. I am an executive with an independently owned community bank that employs 560 workers. Our only health plan is a high deductible plan that provides minimum essential coverage and very few extras. However; due to large claims experience and a relatively small population to spread it across, the cost of employee only coverage will exceed \$10,200 by 2018. We've been planning for this since the ACA was passed and cannot find a way to avoid the tax. We have financially harmed our employees by cutting benefits and increasing deductibles, but that is not enough. Like other employers, if this tax is not repealed, we will be forced to discontinue our health plan and 560 more Americans will become uninsured. Our employees and their dependents need their insurance and this tax contradicts the very purpose of the ACA. Please reconsider your position as our employee base is truly the "backbone" of our country's tax base as well as the primary revenue source for our healthcare industry.

Chris M. Cronin Executive Vice President American National Bank of Texas Direct Line 214-863-6760



AMERICAN NATIONAL BANK OF TEXAS
YOUR Bank, For Life.

CONFIDENTIALITY NOTICE

CONFIDENTIALITY NOTICE

This e-mail message and all documents which accompany it are intended only for the use of the individual or entity to which addressed, and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If the reader is not the intended recipient, any disclosure, distribution or other use of this e-mail message is prohibited. If you have received this e-mail message in error, please notify the sender immediately. Thank you.