

Notice 2015-52

AUG 10 2015

From: Kathy Howe <KathyHowe@anbtx.com>
Sent: Tuesday, August 04, 2015 2:29 PM
To: Notice Comments
Subject: Excise Tax on High Cost Employer-Sponsored Health Coverage

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. We are a 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 Like other employers, if this tax is not repealed, we will be forced to discontinue our health plan and **871 more Americans will become uninsured**.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.

Respectfully,
Kathy A Howe, EVP
Director of Wealth Management & Trust

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