LEGAL PROCESSING DIVISION
PUBLICATION & REGULATIONS BRANCH

Notice 2015-52

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From: Allen Hippler <Allen.Hippler@nrim.com>
Sent: Monday, September 21, 2015 2:51 PM
To: Notice Comments
Subject: nottice 2015-52

To Whom it May Concern,

I am writing to request that implementation of the excise tax, known as the 'Cadillac Tax', be conducted in such a way as to not disproportionately harm Alaska and Alaskans.

Alaska has higher health insurance costs than other states. According to a recent Premera study, 62% of Alaska plans would be immediately subject to the Cadillac Tax. Even a large number of high deductible plans would be subject to this tax, and these plans are hardly 'Cadillac' in nature compared to plans in the rest of the country. My plan, for example, has a $2500 deductible for my family; even so, the annual cost of the plan is almost at the cost threshold today; a couple of years of medical cost inflation and I will end up having a 'Cadillac' plan!

As proposed, the implementation of the Cadillac tax would be to devastate Alaskan markets. But the intent of the ACA was to help health insurance markets, not destroy them, per King –vs- Burwell. Alaska would suffer disproportionately.

What I would suggest is some kind of regional/geographic cost adjustments to more equitably allocate this cost.

Thank you!

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