



08/11/2011 05:17 PM

To premiumrateincreases@ins.state.ny.us

cc

Subject Notice of request by Emblem Health- GHI for a rate increase dated July 2010

August 11, 2011

To the New York State Insurance Department

Dear Sirs:

This letter is being sent to your department as an objection to any rate increase in my health insurance premiums which are being requested by my provider, GHI – Emblem Health. For the record, my insurance is the Small Business Advantage Plan of GHI, a subsidiary of Emblem Health.

According to the notice I received dated July 15, 2011, GHI has asked for a rate increase of more than 23 % for individual coverage, an outrageous request. To state in what this means for me in payments, if GHI is granted its request my current premium will rise from \$879.10 per month to over \$1,088 per month (in annum payments from \$10,549.20 to 13,059.91) and please note that this is for only one person.

I feel that before GHI (Emblem Health) is granted any increase, that they should look internally to see what non-insurance payment expenses can be reduced. For example, Emblem Health has permanent display advertisements at the CITIFIELD baseball stadium something which is costly and totally unnecessary given the lack of competition in the downstate health insurance market. It is nice that Emblem – GHI has decided to support one of the local sports teams, but in effect they are being generous on the backs of their subscribers by passing this expense, a luxury which can not be justified especially in today's economy, onto their subscribers. Other advertising by Emblem – GHI also can not be justified due to the limited options available in the downstate market – note that most of GHI subscribers are either civil servants, union members, members of small business groups or purchase their insurance through agents, where advertising has little or no effect in the decision making process in selecting health insurance.

I also feel that the salaries paid the top executives of Emblem – GHI should be examined – not only their base pay but if they are routinely being given raises (or cost of living adjustments) when most people these days are not receiving any salary increase. It is my opinion that before Emblem – GHI is granted any increase in the

premiums of their subscribers, they should freeze all salaries, institute a hiring freeze, reduce their work staff through attrition, and the top executives should take a salary reduction equal to whatever premium increase which is granted by the state (i.e., if the premiums increase 5%, then the top executives should take a reduction of 5% in their salaries). Furthermore, GHI - Emblem executives expense accounts, fringe benefits (company cars, chauffeurs, housing allowances, flying first class, etc.), lunches, dinners, parties, expensive hotel rooms, trips to conventions, should be audited by the state insurance department for justification and eliminated. And GHI - Emblem Health's monthly newsletter should be eliminated in this cost cutting plan.

Another issue which I want to enlighten the State Insurance Department is about the situation of one person groups – sole proprietors or those who are self-employed, a category which includes me. Those who are classified as a one person group are forced to pay a surcharge in their premiums which range between 20% or 30% more than groups which are two employees or more. This is a form of discrimination against one person groups, something which the State Insurance Department should put an end to immediately.

Therefore, I request that the State Insurance Department not approve any increase in health premiums for GHI (and Emblem Health). Let the executives of GHI - Emblem Health first look internally to balance their books on the administrative side before requesting any rate increase. Unfortunately, there are few, if any options for people like me (except to move to Canada) and if New York State wants to prevent its residents from moving to another state, this state needs to be affordable and one of the major costs of living concerns health insurance premiums. Hopefully, this letter will be read and my suggestion of immediately eliminating the discrimination against one man groups of surcharges will be considered.

Thank you for reading my letter.



08/15/2011 07:27 PM

To <premiumrateincreases@ins.state.ny.us>

cc

Subject Public Comment

□

TO: NYSID

FROM: GHI Subscriber

Subject: Comment on rate hike proposal: PLEASE READ

I am a single-payer PPO GHI subscriber looking at a potentially **9% increase** of my individual's "Value Plan" for 2012, a plan which does not cover doctors' visits or lab fees, I might add.

Last year NYSID approved Emblem/GHI's request for an astonishing **19% increase** rate increase,

Remarkably, Emblem's letter to subscribers last year attributed the increase to the cost of enhanced benefits required by the PPACA. {This year it didn't bother to explain its petition.} ***However***, this first round of Fed mandates were projected to "add 2-5% to projected 2011 plan costs." How, then, did Emblem arrive at, and receive from NYSID, 19% ?!!!

What was the explanation for such an incredulously astounding discrepancy?
{And, how much of this figure included the company's officers' compensation increase? The public doesn't, and can't know, it not being a publicly-traded corporation; this data is assuredly not disclosed in its annual report.}

The past 10 years GHI subscribers as myself have experienced on average 7.2% increase/year -- even outstripping that of private institutions of higher learning. In fact, just what has increased 19% in this woefully stagnant economy/ 2011? Not defense spending, not even gold. Only compensation for hedge fund managers, certain titans of Wall Street, and Fortune 100 CEOs. Perhaps that of Empire, as well?

As I also pay taxes, I must report to NYSID that I am at the breaking point with Emblem's outrageous rate increases, which now account for 20% of my AGI {adjusted gross income}.

I *strongly urge* NYSID to take a thoroughly hard look at Emblem's request, including that Emblem is ever pricing many of us completely out of the market--I certainly cannot sustain these out-of-line, stratospheric raises. As well, I am certain that I'm not alone in reeling from the 19% increase you granted Emblem last year, for 2011, and given that gigantic increase, I'm even stunned that any increase is being considered for 2012. I would submit that next to none of our incomes can possibly keep up with Emblem Health.

Thank you for your critical and measured consideration.

Yours truly,



08/14/2011 01:09 PM

To PremiumRateIncreases@ins.state.ny.us
cc

Subject EmblemHealth/GHI requested premium rate increase

Health Bureau-Premium Rate Adjustments

New York State Insurance Dept.

25 Beaver ST

New York, NY 10004

To Whom it may Concern:

I am writing to you to voice my objections to the rate increase for my Small Business Advantage Plan proposed by Emblem Health/GHI.

The total rate increase proposed is 23.8%. An insurance premium increase this large is outrageous. If Emblem Health were granted an annual premium increase this size, my health insurance premium would more than double in four years.

EmblemHealth states that they have increased the fees they are paying doctors and hospitals, and this justifies a premium rate increase. The doctors I have spoken with say that they haven't received any increase in insurance payments.

EmblemHealth states that there are a variety of EmblemHealth plan options that I might subscribe to and reduce my health insurance premium. That may be so, but that by itself doesn't guarantee that any of the doctors that I currently use or have used participate in those plans. In addition, the plans that I've looked into on the GHI web site don't offer the same benefits. In fact, they offer fewer benefits.

My income isn't increasing by 23.8% annually. Interest rates on savings accounts are less than 1%. People aren't getting 23.8% salary increases at their jobs. Where are people supposed to come up with the money to pay for health insurance, when the premiums are skyrocketing and the economy is in a slump? Inflation isn't even at 23.8%!

Please, deny EmblemHealth/GHI an increase in my health insurance premium. If you find it appropriate to grant EmblemHealth a premium rate adjustment, I ask that you keep it minimal.

Thank you for your attention to this matter.

Very truly yours,



08/14/2011 04:16 PM

To PremiumRateIncreases@ins.state.ny.us
cc

Subject Re: Premium Rate Increase For 2012

Health Bureau- Premium Rate Adjustments
New York State Insurance Department
25 Beaver Street
New York, New York 10004

Dear Sir and/or Madam:

I am writing to you in response to the letter that I received which served as an advance notice about the rate increase of 9.8% to my Group Health Insurance Premium Rates for my GHI Individual PPO policy Direct Pay Value Plan effective beginning January 1, 2012.

Calendar Year	Monthly Premium	Percentage Increase
2006	\$365.50	
2007	\$415.62	14%
2008	\$469.65	13%
2009	\$469.65	0%
2010	\$561.23	20%
2011	\$695.33	24%
2012	\$763.47	9.8%
2006-2012	\$365.50-\$763.47	109%

There has been a 109% increase in this value plan in seven years since I was accepted to this policy. I paid for one monthly premium at the rate of \$369.50 for the 2006 year that got transferred to 2007. On January 1, 2012, I will have monthly premiums that will cost more than double the original premium that I paid in 2006.

How do you call this value? Why are GHI and Emblem Health's costs constantly going up? How could this insurance policy still be considered affordable health coverage and a value plan for the New York State consumer? Please reconsider. Thank you.

Sincerely,



08/14/2011 05:41 PM

To premiumratefilings@emblemhealth.com
cc premiumrateincreases@ins.state.ny.us
Subject Unacceptable 23.8% increase - from small business owner

EmblenHealth
To whom it may concern,

We are in receipt of you Advance Notice about Changes to

our Group Health Incorporate Premium Rates.

This is the second year that you have increased the rates at an extremely high rate.

Last year's increase was 75%.

One year later you are asking for an additional 23.8% increase!

With the economy the way it is, you are punishing the "small business owner" even more. When will this stop?! Do you "really" value your relationship with us as you quoted ?

WHEN ARE YOU GOING TO FOLLOWING FEDERAL GUIDELINES, AND MINIMIZE YOUR ANNUAL INCREASE TO 10% PER ANNUM?!

PS. A copy if this is begin sent to the New York State Insurance Department.



08/17/2011 12:01 PM

To premiumrateincreases@ins.state.ny.us

cc

Subject (GHI) Emblem rate increase

Dear sirs:

I recently received a letter from Emblem regarding their proposed rate increase of 23.8%. I would like to vehemently object to this increase. Last year they raised it by a similar amount, which in itself was so out of line with the generally accepted increases in the industry as to be preposterous. This additional increase would be obscene.

The reason I joined an HSA was to help keep costs down. I have done my part but it seems insurance companies are only interested in the bottom line.



08/18/2011 08:14 PM

To premiumrateincreases@ins.state.ny.us

cc

Subject No More Increases

Please do not approve increases in health insurance premium. My Emblem Health is seeking to raise my premium by 23.8%! I can't afford it. My salary does not increase!

Thank you



08/21/2011 06:19 PM

To PremiumRateIncreases@ins.state.ny.us

cc

Subject Stop the EmblemHealth GOUGE; proposed 12.6% rate increase vs 3.4% medical cost inflation

Dear Sir or Madam,

EmblemHealth has sent me a letter saying that they plan to increase my individual health insurance premium by 12.6% in 2012, from \$2,258 per quarter to \$2,543 per quarter. Since 2006, my premiums will then have more than DOUBLED, from \$1,227 to \$2,543 per quarter. For one person, who has enjoyed good health all his life; this is unconscionable.

I am writing to ask you to disallow this latest increase. According to the medical cost data component of the U.S. Government's Consumer Price Index (CPI-U), medical cost inflation in the last year was only 3.4%; since 2006, it was only 25.2%. This suggests that this latest premium increase may represent an overcharge of nearly four-to-one.

Since 2006, the CPI-U data suggests a premium increase overcharge of 4.26-to-one.

In light of this I submit that you should award EmblemHealth a rate DECREASE to begin recouping their overcharges over the past decade and to punish them for submitting yet another rate increase proposal so blatantly in excess of the actual 3.4% medical cost inflation in the last year.

Note also that demanding money (e.g. rate increases) under false pretenses is fraud. A lot of us would be very pleased indeed if you also saw fit to refer some of these health insurance companies to the State Attorney General for investigation and, if appropriate, prosecution.

The health insurance industry has been bleeding both individuals and businesses dry for years. It's time for this to stop, and it is time for accountability for both the health insurance companies and for their executives.

Sincerely,