

RECEIVED

JUL 05 2011

HEALTH BUREAU  
N.Y.C. OFFICE



June 30<sup>th</sup> 2011

Dear SUT, RE: OBJECTION  
TO RATE FILING  
FOR OXFORD  
SMALL GROUP HMO PLAN

I write to object to the  
absurd suggestion that approval is  
granted for a 20.9% increase in  
premiums.

Do the insurers live in the real  
world of stagnating wages  
and a battered economic system?

Frankly this is one more attempt  
to increase already bloated profits  
before Obama's much needed  
health reforms take effect.

Please note my strong opposition.

Yours sincerely,  


July 07, 2011

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

RECEIVED  
JUL 11 2011  
HEALTH BUREAU  
N.Y.C. OFFICE

Re: **Opposition to Proposed Rate Increases**  
**Oxford Healthcare Medical Insurance**

**Products Name: Oxford Liberty HMO**

To Whom It May Concern:

We have received notice from Oxford Healthcare regarding a rate application they are filing to increase rates for calendar year 2012. It was also stated that the increase, if approved, would be added to our current 2011 premium rate. I would like to say that this proposed increase has a negative impact on both small business and their employees.

[REDACTED] employees. This rate increase would have a negative impact on growth and create an added burden to the already high costs in New York State. This increase would result in lower profits, therefore limiting the ability for small businesses to reinvest, create new jobs, start new ventures or update infrastructure due to reduced profits brought by the higher medical costs. This will limit the growth of the company.

Our Company signed a contract agreeing to the 2011 increase and now **Oxford is asking for yet another increase** even though we are in contract for the current rate. In addition, our HMO Plan's 2011 renewal increased 13.5% and now there is a proposal for a similar increase again midway through the contract term. It is an unfair practice to approve such an increase.

Something else to consider is this could be an additional medical expense to me, the employee, if my employer does not pick up the whole increase, thus decreasing the money that can be spent in other ways to spur the current economy. The chain reaction effect can be crippling.

Please do not approve this proposed increase if you want small businesses and their employees to be successful in New York.

[REDACTED]

June 29, 2011

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

Re: Rate Filing for Oxford New York Small Group HMO Plans

Dear Sir or Madam:

I have my health insurance through United Healthcare, Oxford HMO/Liberty Network. [REDACTED]

Recently, I received a notice from Oxford that they are seeking another rate increase of my HMO rate for the calendar year 2012. Their proposed medical increase is 20.9%; their proposed pharmacy increase is 20.5%; and their proposed total increase for Medical and Pharmacy is 20.8% above my current premium.

[REDACTED] I currently pay \$426.98 per month for my health insurance with Oxford. I am required to pay \$30.00 per visit as a co-payment to my primary care physician; \$50.00 per visit for specialists; and there are limitations on the number of visits I may utilize for various services.

It seems that every year Oxford requests and is granted a rate increase. I am writing in the hope that you will deny Oxford's rate increase request.

The level of services being provided my medical practitioners has decreased. Many of the physicians participating in the Oxford HMO plan have employed Nurse Practitioners and

Physician Assistants to assist them in their practices to see their patients. However, the rate the medical doctor is billing out to Oxford has remained the same. Apparently, there is a loop hole, that so long as the physician is on the premises, he/she can have his/her patients seen by a Nurse Practitioner or Physician's Assistant and still bill the health insurance company at the Medical doctor's billing rate. In some instances, the physician isn't even physically on the premises and yet he/she still bills out at the medical doctor's rate, when the patient was seen by someone other than a medical doctor. There is no reduction in the physicians' billing rate to the insurance carrier, despite the fact that their patients are now being seen by Nurse Practitioners, Physician's Assistants, etc.

The amount of actual time being expended by participating "physicians" in seeing patients has decreased. The covered services have decreased. It is incomprehensible to me how my insurance company or any other can even be considered for a 20% rate increase in light of the aforesaid.

Moreover, generally speaking, employers have not and cannot grant a 20% cost of living increase to their employees. The average person's income is not increased annually on a 20% basis. The cost of living increases granted by the State employers is never at a rate of 20%. It is usually more like 3% or 4%.

Salaries, the cost of food, etc. does not increase annually by 20%. It is not fair or rational to afford health insurance companies a 20% rate increase. How can New York State Department of Insurance even consider granting such a rate increase?

Businesses generally do not increase their charges by 20% on an annual basis, despite the increase in their operational expenses. Even Congress only unilaterally votes itself a 6% annual increase in salary. Why would you permit the health insurance industry be afforded such a benefit? In this economy, the average salary has actually remained about the same, despite the increase in the amount of work; workers are being required to be performed.

When salaries, vacation time, benefits, etc. are increased for all workers in this country at a rate of 20% annually, then you should entertain Oxford's proposed rate increase. Until then, neither Oxford nor any other health insurance provider should be afforded any exorbitant rate increases to the detriment of its consumers.

I am sure that I am not alone with my struggle to keep up with paying for the cost of my health insurance premium. We rely upon you to protect our interests. Under the

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N.Y.C. OFFICE  
2011

Re: Rate Filing for Oxford New York Small Group HMO plans

Dear Sir or Madam:

I am writing to urge you to oppose any increase in premiums with the aforementioned HMO plans. Oxford is seeking to raise their rates an astronomical 25.1% at a time when Oxford's parent company, United Healthcare (UHC), has made enormous profits during this economic recession. UHC has also engaged in dishonest business practices that have defrauded policy holders, myself included, and taken money away from vital health care. They have also vigorously worked to oppose any health care reform that seeks to make health care more available and affordable to average New Yorkers. For these and other reasons, you should take whatever steps necessary to ensure that Oxford and/or UHC is not allowed to make these unreasonable rate increases.

Firstly, UHC has made enormous profits during this time of economic distress. While most New Yorkers have been tightening their spending or looking for work, UHC's profits have doubled over the past two years, from trading at \$25.12 on June 29, 2009 to trading at \$51.53 today (according to the Wall Street Journal's website). This profit margin shows a company that certainly does not need a 25.1% increase in premiums, especially at a time when most small businesses in New York are struggling to keep their doors open.

If Oxford/UHC were to get these premium rate increases, I have strong reason to believe that this money would not go to improving health care here in New York. William W. McGuire, MD, the former Chief Executive Officer and Chairman of the Board of UHC, recently settled a case with the Securities and Exchange Commission for his alleged role in misleading investors and manipulating stocks during his time leading UHC. The settlement was for a jaw-dropping \$468 million!<sup>1</sup> Additionally, UHC has played a key role in opposing any type of meaningful health care reform over the past few years. According to Bloomberg News, UHC's participation in America's Health Insurance Plans (AHIP) has led them to spend money on lobbyists, legal advisors, political contributions, advertising campaigns, and other measures designed to oppose reforms that would challenge their business model.<sup>2</sup> Based on this culture of greed and opposition to improving health care for all at the very top of UHC, my guess is that any rate increase will not go to purchasing necessary medical equipment, increasing nurses' salaries, investing more in electronic health record-keeping, or other worthwhile expenditures; rather, it will create higher profits and prevent meaningful health care reform here in New York.

I feel very strongly that you should oppose any rate increase for Oxford or UHC. I look forward to hearing that you have denied their request in full.

June 23, 2011

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

Attention: Superintendent

Subject: United Healthcare( Oxford) request for 21% increase for 2012.



As of June 1<sup>st</sup> 2011 my company paid an increase of 13% to Oxford for employee health insurance. The proposed increase requested by our carrier of 21% is outrageous. The increase is an unjustified exorbitant amount based on projected inflation and other cost factors.

Please deny this request on behalf of Small Business America.

Sincerely

July 07, 2011

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25 Beaver Street  
New York, NY 10004

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JUL 11 2011  
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**Re: Opposition to Proposed Rate Increases  
Oxford Healthcare Medical Insurance  
Insurer: JR Andorin, Inc.  
Products Name: Oxford Liberty HMO**

To Whom It May Concern:

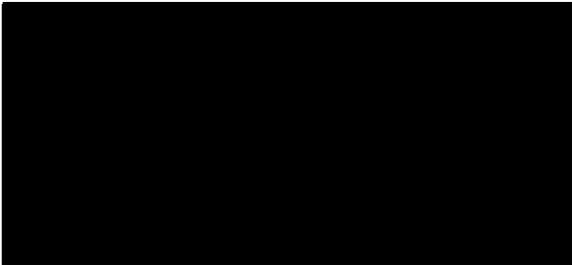
I have received notice from Oxford Healthcare regarding a rate application they are filing to increase rates for calendar year 2012. It was also stated that the increase, if approved, would be added to our current 2011 premium rate. I would like to say that this proposed increase has a negative impact on both small business and their employees, such as myself.

 This rate increase would have a negative impact on growth and create an added burden to the already high costs in New York State. This increase would result in lower profits, therefore limiting the ability for small businesses to reinvest, create new jobs, start new ventures or update infrastructure due to reduced profits brought by the higher medical costs. This will limit the growth of the company.

Our Company signed a contract agreeing to the 2011 increase and now **Oxford is asking for yet another increase** even though we are in contract for the current rate. In addition, our HMO Plan's 2011 renewal increased 13.5% and now there is a proposal for a similar increase again midway through the contract term. It is an unfair practice to approve such an increase.

Something else to consider is this could be an additional medical expense to me, the employee, if my employer does not pick up the whole increase, thus decreasing the money that can be spent in other ways to spur the current economy. The chain reaction effect can be crippling.

Please do **not** approve this proposed increase if you want small businesses and their employees to be successful in New York.



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