



07/16/2011 06:21 PM

To [REDACTED]
cc
Subject Comments on United Healthcare Ins Co of NY Health Insurance Rates Filings

I have jsut received a notification from United Health Care - Oxford that they have applied for an estimated medical increase for 2012 over 2011 of 14.0% (and that the rate of increase may be diffent) and that I may submit written comments in connection with this increase to NYSID.

I wih to avail myself of this opportunity.

For Oxford Freedom in 2010 I paid \$13,776 annual amount
For Oxford Freedom in 2011 I paid \$ 16,421 annual amount
This was an increase of 19.2 % in 2011

It is difficult for an individual to have the resources to know why such large increases are approved year after year.

Seems to me we should just not remain silent but individually express our objection which is what I am doing.

Thank you



07/16/2011 06:34 PM

To <PremiumRateIncreases@ins.state.ny.us>
cc
Subject Proposed 2012 rate increases

To whom it may concern:

I write to oppose the proposed 2012 rate increases filed with the New York State Insurance Department [hereinafter NYSID] on or about June 22, 2011 concerning United HealthCare-Oxford's [hereinafter Oxford] New York Small Group EPO plans.

The estimated total increase over the 2011 premium is 12.5 percent. This is far above the current general rate of inflation in this country. That the inflation rate for medical costs runs higher than the

general inflation rate does not justify such an enormous disparity, particularly since a major reason why the medical inflation rate is so high is because governmental authorities such as NYSID approve huge rate increase requests like that currently proposed by Oxford.

Where is the money from such medical rate increases going? To compensate Oxford executives? To Oxford shareholders? To doctors? To hospitals? Why do any of them deserve such increases when, in light of current economic conditions in this country, the average American is not seeing anything near such increases in terms of earnings, wages, or interest?

I note that year after year, Oxford has obtained from NYSID premium rate increases of similar size, always far surpassing the general inflation rate in the country. Most notably, although Oxford's Metro Option 5 that I had last year received a 12.5 percent increase effective April 1, 2011, Oxford simultaneously raised the amounts patients had to pay in the areas of out-of network services, emergency room visits, other hospital visits, radiological services, and prescription drugs.

Oxford's proposed rate increase for 2012 seeks to extend this already abominable pattern of rate increases.



07/17/2011 08:15 PM

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

Subject Protest

I protest the allowance of a premium rate increase for United Healthcare / Oxford Insurance – Oxford New York Small Group EPO plans.

It is overly simplistic for this insurance company to raise rates across the board.

I do my best to take care of my health – I eat reasonably well, I exercise regularly, I see all my doctors for biannual or annual check-ups as required, and I maintain insurance for catastrophic situations. I shouldn't have to pay more on a regular basis because the insurance company has failed to analyze and provide appropriate levels of insurance to meet the diverse of its members / member companies and instead wants to lump us all in to one category to cover the extreme uses of a few.

It is not right for me to subsidize the bills of another person (or company) and I request that you ask the insurance company to do more to offer appropriate tiers of insurance, rather than allowing them to raise rates across the board.

Thank you,



07/17/2011 10:24 PM

To PremiumRateIncreases@ins.state.ny.us
cc

Subject Rate increases for EPOs

Health Bureau-Premium Rate Adjustments
<http://www.ins.state.ny.us>

July 17, 2011

To Whom It May Concern:

I understand that United Healthcare/Oxford is seeking an increase in its EPO rates for small groups renewing for calendar year 2012, and that the increases may reach as much as 13.5%. I protest!

[REDACTED] e, insured by Oxford via [REDACTED] subscribing to the Freedom Exclusive EPO. The proposed increase would cost me an additional \$1200 a year for the medical premium alone. As it is, even with group insurance, health care is by far my largest annual expense, vastly exceeding my rent. (No, my apartment is not rent controlled.) As it is, since May 5, I have paid a staggering \$3000 in out-of-pocket expenses for co-pays, etc. The prospect of medical and pharmacy increases beyond what I already pay is unthinkable.

Please do everything in your power to scrap any proposals for increases, or to keep increases at the lowest possible rates.

Thank you for your consideration.

Sincerely,



07/17/2011 11:03 PM

To premiumrateincreases@ins.state.ny.us
cc
Subject United Healthcare Oxford

It is hard to believe that the health insurance industry can continue to increase rates by double digits in difficult times.
Oxford New York Small Group EPO plans



07/18/2011 12:24 PM

To
cc
Subject Comments on Oxford Health Insurance, Inc. Health Insurance Rates Filings

Dear Sirs:

I can not understand how the insurance industry has not brought there costs in line with the rest of us.

over the years they continue to show 20 to 30 percent increases and reduction in service.

there is never an accounting of exactly the reasons why and it seems that they hold both us and the State to ransom after all if you do not agree raises they can withdraw from the State.

it is as I understand it supposed to be a request and if the overage is not used a credit back to our plans.
it is time for the State to take a hard line on the insurance business and freeze them from such practices. Most of this all seems to be 'spent' not on improved services or coverage but on Administration and profits.



07/18/2011 01:20 PM

Please respond to

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

cc

Subject Oxford proposed rate increase

July 18, 2011

Health Bureau-Premium Rate Adjustments

New York State Insurance Department

25 Beaver Street

New York, NY 10004

To Whom It May Concern

I am writing in response to a letter I received from United Healthcare – Oxford regarding their proposed rate increase.

I am both a member of Oxford and a medical provider. [REDACTED]). This proposed increase is outrageous and offensive, and will force providers such as myself out of business. The insurance providers keep raising premiums, yet they do not increase reimbursement to providers, at least not to [REDACTED]. I have been a provider for nine years and have NEVER RECEIVED AN INCREASE IN REIMBURSEMENT RATES OVER THE LAST NINE YEARS.

Two years ago, I had to pay approximately a 14% increase for my own Oxford Health Insurance; last year the increase was about 11% and now it is proposed to increase another 14% in premiums. Where are these profits going? To line the pockets of the shareholders - Certainly not to pay providers! All of my costs increase yearly (this being the largest) yet I cannot get a raise in reimbursement!!!!!! I can only see this continued practice forcing me to close my business eventually if nothing is done. I speak to other providers, in various disciplines suffering the same problems.

These increased premiums hurt larger businesses as well, forcing a bigger chunk of everyone's earnings to go toward these despicable rate hikes. This is a completely unjust increase and MUST NOT GO THROUGH!! Please examine this situation more closely and disallow this proposed increase.

Sincerely,



07/18/2011 01:42 PM

To

cc

Subject Comments on United Healthcare Ins Co of NY Health Insurance Rates Filings

To Whom It May Concern:

I am on a fixed income at the [REDACTED] If my health insurance goes up any further than it is, then I have no alternative to cancel and go without. At this time, I am healthy with some medications. Without medications though, I will have some serious problems.

I urge your group will consider those that are not working and those that live on a fixed income.

Sincerely,



07/18/2011 01:48 PM

To PremiumRateIncreases@ins.state.ny.us

cc

Subject Against Rate Increases

I was informed by my insurance company, Oxford, that they have asked for a 14% rate increase. This is after significant increases over the past two years. I refuse to believe their cost of doing business has gone up so much more than both my cost of business and my income. This year, we reduced our cost by eliminating prescription coverage from our plan. How many times will we have to sacrifice so that my insurance company can increase their rates? Also, I do not find their rate increases are increasing my services, or improving the ineptitude of their customer service. As a simple example, it required 4 calls to find out that we are allowed to see an out-of-network doctor for a follow up if he saw my child as part of a hospitalization. These calls consumed an hour of my time.

As a citizen of NY and a small business owner, I oppose this increase.



07/18/2011 02:23 PM

To PremiumRateIncreases@ins.state.ny.us

cc

Subject Fwd: In Protest of Proposed HIGHER 24.1%
UnitedHealthCare New York Small Group Health Insurance
Rate Increases

July 18, 2011

Attn: Mr. Charles Lovejoy

Dear Mr. Lovejoy,

As a followup to my earlier notes, according to The Atlantic, UHC (which now seeks a 24.1% rate increase on the backs of small employers) is number 11 on the list of "The 19 Most Hated Companies in America" and has the dubious distinction of having one of the lowest consumer (subscriber) satisfaction scores while having among the highest employee ratings.

This is clearly a company run for the benefit of its employees and shareholders (as illustrated in my earlier note), not its subscribers and company/plan rate payers.

This needs to change.

June 24, 2011

Attn: Mr. Charles Lovejoy

Dear Mr. Lovejoy,

I write as the negotiator, buyer and [REDACTED] for, as well as a covered individual in my firm's United Health Care / Oxford Small Group Health Care insurance policy.

I previously wrote you on March 31 and April 1, 2011 to protest what were

then proposed 18-20% increases in Oxford Health Care Small Group EPO Plan 4th Quarter 2011 renewal rates.

Oxford advised us today that they propose to increase Medical, Pharmacy and Total rates for such Plans *by an even higher amount -- by 24.1%* . This degree of increase is unwarranted, unconscionable and unaffordable.

To summarize my comment and request to you: I am adamantly opposed to United Health Care / Oxford proposed 24.1% rate increases for Fourth Quarter 2011 Small Group EPO Plan policies and am similarly opposed to any further grant of rate increases to Oxford / United Health Care, period, for reasons I will specify following.

1./ The proposed United Health Care New York Small Group Health Insurance Rate Increases would be the third, sequential, high double digit (17-24%) per annum rate increase in three years. Since 2008, our *existing* New York Small Group rates -- *for more limited plan designs of declining value* -- have cumulatively exceeded a 60% increase in rates -- rates which Oxford proposes to increase by 24.1% more.

2./ Speaking for my small group, claims and usage have in no way increased commensurately with rates over this period, nor is it my understanding that reimbursement to servicing physicians has increased commensurately with rates. In fact, utilization has been closer to static than evidencing any increase.

3./ While Oxford / UnitedHealthCare is a for-profit firm, that does not excuse them from the requirement to run a tighter administrative organization at lower overhead costs. In addition, UnitedHealthCare (ticker "UNH") stock price performance has over the past two years increased by 105% compared with less than 50% for the Dow Jones, NASDAQ and S&P 500 Indices. *How much more* share price appreciation/performance should come from the backs of subscribers? Indeed, based on a twice the market indices performance, subscribers are if anything due rate *reductions!*

4./ Given our stable claims and usage, it appears that New York Small

Group rate payers are being drained to "bail out" a bloated UNH overhead structure as well as fund unrealistic profit, price-earnings ratio, stock price and dividend increase expectations.

5./ While my comments address our recent proposal from and experience with UNH, when we have over the past ten years shopped the policy via brokers, we have seen lockstep rate increases and anti-competitive behavior in the way of rates and policy re-designs/exclusions erode any ability whatsoever to negotiate or to moderate exposure to rate increases granted year-after-year on an industry-wide basis.

6./ While I do not yet have access to UNH-competitors proposed rates for our Fourth Quarter 2011 renewal, I expect your office does, and can see the "parallel thinking" and collusive behavior in rate requests.

7./ Runaway health care insurance policy rate inflation must be stopped. For the benefit of all New York small businesses affected by these proposed rates, your office can and must take steps to impose an industry-wide rate holiday, now.

Should you have any questions you would like to address to me about our experience with small group rates, please to not hesitate to call.

Thank you for your consideration.

Attn: Mr. Charles Lovejoy

Dear Mr. Lovejoy,

As a brief followup to my earlier comment (attached, following), please note the following article that appeared in Bloomberg what illustrates the insurance industry's apparently collusive rate and conditions-setting behavior.

Thank you again for your consideration.



07/18/2011 03:21 PM

To PremiumRateIncreases@ins.state.ny.us
cc
Subject United Healthcare Rate Increase

To Whom It May Concern:

I just received a letter from United Healthcare explanation their request for an increase in insurance rates for Small Group EPO plans in calendar year 2012. I've been insured with United Healthcare for several years now, under Colden Corporations contract 08G7628. Since, 2007 my employee contribution for a family plan has gone from \$247.71 to \$435.22 per month, a difference of 76%. This doesn't even take into account the fact that I switch from a PPO to an HSA plan. On average, over the past four years, my insurance premium has risen 20% per year. How is it possible that the health insurance industry's expenses have risen at a rate of 20% per year, while every other industry in the world is 2-5%? How much longer until the government realizes the effect that these insurance expenses will have on America?

And unbelievable as it may seem, the quality of service they provide has gone down since 2007. It really is the typical health insurance mantra of pay more and get less. Literally, every claim that I've filed with them has been "mistakenly" billed incorrectly so that it costs me more. That is no exaggeration. I have to call United Healthcare multiple times to correct the billing situation with the medical provider, or else it is my credit and good name that suffers the consequences.

These insurance companies have been abusing the policy holders for too long. How can they legitimately justify these continued rate increases? The NYSID would be morally bankrupt to approve this current rate increase. And if you do approve it, the rest of us New Yorkers would just be financially bankrupt.

Feel free to contact me for additional information regarding the rate increases United has been dealing my company for the past four years.



07/18/2011 07:20 PM

To PremiumRateIncreases@ins.state.ny.us
cc
Subject Fw: Oxford rate increase



I would like to receive information on why my rate will be increased, it was increased last year approx. 24% and an additional increase will put a large burden on our firm. Please see attached for the information that I received from Oxford, thank you

Thank you,



07/18/2011 09:34 PM

To PremiumRateincreases@ins.state.ny.us

cc

Subject RE: Rate Filing for Oxford N.Y. Small Group EPO Plan

Dear to Whom it May Concern:

I have recieved the information regarding increase to my health care plan through (Oxford Small Group EPO). This proposed increase of 14%, 11.6% and 13.5% respectively for each catagory stated in your letter for the year 2012 is unfair, unjust, and unrealistic.

How can United Health Care with its considerable profits allow their subsidiary Oxford to take advantage of medically insured members who took out the policy in 2011.

Most of us in my company have had no pay increase in years and recently had to work a full day for half a day's pay, or only work fours days per week for over a year.

I respectively ask that you reject this unjustifiable increase.



07/19/2011 02:59 PM



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

cc

Subject Oxford Proposed Rate Increase Filing

Dear Commission Staff

I received the attached notification of proposed rate increase from Oxford and am writing to this email, as requested, to voice my objections.

As you may be aware, Oxford increased rates dramatically for 2011, which I suspect was intended to get in ahead of the new health care act. They accomplished this partly through direct rate increases and partly through plan redesign that cut benefits, which is essentially the same as a rate increase. As a result, I purchased a Health Savings Account plan with a very high deductible and no out of network benefits to control the costs of my small group plan. This limited Oxford's exposure significantly. Despite this, they are now asking for an approximately 15% increase in premiums.

This increase request strikes me as substantially inconsistent with the intent of the new health care act and medical inflation. For example, the Bureau of Labor Statistics reported that 2010 CPI rose 1.4% for the NY Metro area over 2009 while medical inflation ran 3.3%. For the twelve months ending June 2011, they report NY Metro overall inflation of 3.2% and for medical inflation, 3.0%. While I realize this is a community rated plan and Oxford's experience could vary from the general local level of inflation, their proposed rate is **5 times** the prevailing rate of medical inflation.

Also note that this is for a plan with only "in network" benefits whose rates they presumably influence to a far greater degree than any out of network providers. In addition, many news reports and studies have indicated that policy holders have reduced their use of medical services during this recession. When you combine this with a controlled network benefit only and the requirement that 82% of premiums go to medical disbursements, it is perplexing that their costs can go up by 15%, unless they negotiated very generous deals with doctors and hospitals and their utilization experience is vastly different from the population at large. Given what doctors tell us about their experience of negotiating with Oxford, that seems unlikely as well. Unlike other states, guaranteed acceptance has been a long standing requirement in NY State and the cost of covering dependents to a higher age is modest, as Oxford admits in their notification, which suggests these are not factors in the rate increase request. Despite my requests, Oxford refuses to disclose their actual medical cost ratio and their network increase decisions.

Oxford's parent, United Health Care, continues to generate record profits, spends a great deal on acquisitions, and pays their executives at the top of their and most industries. Like most insurance companies, they endeavor to maintain as much opacity in their pricing as possible since the facts are unlikely to stand the light of day. It is my understanding that the new health care law and subsequent NY State legislation restored the NYSID's authority to review and reject price increases from health insurers to ensure they are fair and reasonable. Since Oxford refuses to disclose the basis on which they determine their price increases to their policy holders, the NYSID is the last line of defense against insurers who have far too many incentives to obscure their pricing, manipulate cost classification, and deny claims to improve their profits. I urgently request the NYSID to deny their request for an increase and limit it to medical inflation.

Sincerely,



07/19/2011 06:07 PM

To
cc
Subject Comments on United Healthcare Ins Co of NY Health Insurance Rates Filings

I am writing to request that you DO NOT approve the rate increase that United Health Care is currently requesting for the renewal date of October 2012 for my Oxford Liberty Plan.

The rate was just increased from \$412/month to \$488/month as a result of President Obama's Health Care Reform. I've already switched to generic drugs to cut the expense and do not visit any doctor unless absolutely necessary. If the rate increases by 24.1%. I will no longer be able to afford to insure myself under this plan and will have to go without medical insurance, which [REDACTED] 2 could be very dangerous to my health. I cannot believe that this company is applying for such an increase after raising my premium by \$76 just recently and increasing my in hospital deductible.

I BEG YOU, PLEASE DO NOT APPROVE THIS INCREASE!!!!

Thanking you in advance for your consideration, I am

Respectfully yours,



07/20/2011 10:54 AM

To PremiumRateIncreases@ins.state.ny.us
cc
Subject Re: Rate Filing for Oxford New York Small Group EPO Plans

07/18/2011

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

<http://www.ins.state.ny.us>

To Whom It May Concern:

I am writing this letter in regard to the recent correspondence I have received from United Health Care, Oxford stating that they are seeking a rate increase. I currently pay an unjustified amount of money monthly for single coverage and at this time cannot even afford insurance for my family and every year I have to make adjustments such as higher co-pays and reduced insurance benefits just to keep the costs from rising 18-20% every year. Now to receive a letter that if this rate is approved it will be added to my current 2011 premium rate is atrocious. If this rate is approved it will make it very difficult to afford my health benefits and furthermore a 24.1% increase in a struggling economy is outrageous and just plain greedy; people are losing their jobs, their homes and perhaps now with an increase above the normal insane percentages every year in health care costs their health benefits.

I do not support this rate increase and hope that New York State does not support this increase either.



07/20/2011 10:55 AM

To premiumrateincreases@ins.state.ny.us

cc

Subject rate filing for Oxford New York Small Group EPO plans

Dear NYSID Superintendent of Insurance,

I received a notice from Oxford (now owned by United Healthcare) notifying me of an application for a rate increase on our small group health insurance plan (Oxford NY Small Group EPO, [REDACTED])

It states that they plan on a 14% increase in premium rates of 2012, and that you will grant this increase, and that I can contact you with comments.

As you know, every year upon renewal our group plan rate increases. The last 4 years the premiums have increased (and I looked up the actuals for you): 17% (2011), 18% (2010), 16.1% (2009), 17% (2008). Therefore each year, I am forced to change to group plans which decrease coverage, to try and keep the premium rate within a 10% increase.

These increases are becoming more and more detrimental to our business, but I refuse to let our employees go without insurance.

This year, because of the sustained poor economy, I have been unable to offer my employee's any salary increases.

I would like to hear the justification for the continued increases of health insurance premiums, especially during a time when the cost of life is barely being met by the income of employees. Oxford will not give me the reasons (in fact, they can't even explain why my Brooklyn premiums are higher than the Manhattan small group premiums). The people that I have access to there have no idea. But they did give me your contact information, for the first time ever.

If the premiums go up, less people will be able to afford coverage, and jamming these individuals and families into an emergency healthcare situation will cost healthcare practitioners more money, while the practitioners/hospitals will more than likely not be paid to cover these expenses...

The health insurance companies are perpetuating a vicious cycle, especially in this economic climate. And they are profiting by inflicting more damage to the economy - they are not providing better services.

Can we, small businesses of NYC, have a one-year break from this?

Please.

Please say that ANY increase of health insurance premiums in 2012 is not justified.

We small business employers and employees are getting squashed here. We need a break. We need an opportunity to build again... we are not just building our own businesses, we are building the US economy.

Oxford tells me that it is in your hands. I don't know if that is true, but I am glad that I have been put in touch with you.

Thank you for this consideration, on behalf of not only me, but also my employees.



07/20/2011 10:55 AM

To PremiumRateIncreases@ins.state.ny.us

cc

Subject Re: Rate Filing for Oxford New York Small Group EPO Plans

07/18/2011

Health Bureau-Premium Rate Adjustments
New York State Insurance Department
25 Beaver Street
New York, NY 10004
<http://www.ins.state.ny.us>

To Whom It May Concern:

I am writing this letter in regard to the recent correspondence I have received from United Health Care, Oxford stating that they are seeking a rate increase. I currently pay an unwarranted amount of money monthly and every year I have to make adjustments such as higher co-pays and reduced insurance benefits just to keep my costs from rising 18-20% every year. Now to receive a letter that if this rate is approved it will be added to my current 2011 premium rate is

unacceptable and unwarranted. If this rate is approved it will make it very difficult to afford my health benefits for myself and my family and furthermore a 24.1% increase in a struggling economy is shocking; people are losing their jobs, their homes and now with an increase in health care premiums perhaps their health benefits.

I do not support this rate increase and hope that New York State does not support this increase either.



07/20/2011 10:56 AM

To PremiumRateIncreases@ins.state.ny.us

cc

Subject Re: Rate Filing for Oxford New York Small Group EPO plans

07/18/2011

Health Bureau-Premium Rate Adjustments
New York State Insurance Department
25 Beaver Street
New York, NY 10004
<http://www.ins.state.ny.us>

To Whom It May Concern:

I am writing this letter in regard to the recent correspondence I have received from United Health Care, Oxford stating that they are seeking a rate increase. I currently pay an unwarranted amount of money monthly and every year I have to make adjustments such as higher co-pays and reduced insurance benefits just to keep my costs from rising 18-20% every year. Now to receive a letter that if this rate is approved it will be added to my current 2011 premium rate is unacceptable and unwarranted. If this rate is approved it will make it very difficult to afford my health benefits for myself and my family and furthermore a 24.1% increase in a struggling economy is shocking; people are losing their jobs, their homes and now with an increase in health care premiums perhaps their health benefits.

I do not support this rate increase and hope that New York State does not support this increase either.



07/20/2011 12:55 PM

To PremiumRateIncreases@ins.state.ny.us

cc



Subject Unreasonable increases from Oxford

Dear Superintendent of Insurance,

My healthcare insurance provider, Oxford Healthcare, recently sent me a letter notifying me that they were requesting to increase the premiums on my health insurance plan by 14%. My plan is the Oxford New York Small Group EPO. [REDACTED]

Please do not approve this increase. Our group rates have increased between 16%-18% every year, and we have been forced to switch to lesser plans, where we pay more co-pay and/or deductible just to keep insurance premium increases below 10%. We cannot afford these continual increases to health insurance.

I sincerely request that there be no increase in premium rates this year. It is stressful to this economy, and as a result, ironically, it is stressful to our health!



07/21/2011 08:44 AM

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

cc

Subject United Health Care Increase

United Healthcare –Oxford Health Plans has notified me of the request for a rate increase of 24.1% on the small plan policy that I have with them. Please do not grant this increase. The very tough economic times that we continue to sustain make it impossible to allow this increase. The rate of inflation has only been 2-3% for 2011 and to grant an increase of almost 10 times that is negligent on the part of NYSID. United Healthcare – Oxford health Plans must recognize that an increase of this magnitude will force many people onto the ranks of the uninsured – just what our government has decried in the past. Please DO NOT GRANT this increase.

Sincerely,



07/21/2011 01:01 PM

To

cc

Subject Comments on Oxford Health Insurance, Inc. Health Insurance Rates Filings

25 Beaver Street
New York, NY 10004

Dear Superintendent Wrynn:

s. Law Â§ 3231 (e)(1) (A) (2010), the [REDACTED] submits the following comments regarding the proposed premium rate increase for Oxford New York Small Group EPO plans (Oxford Metro). On June 22, 2011, [REDACTED] received notification from Oxford of a 12.5% proposed increase in premium rates that would be potentially added to the current 2011 premium rate. We request you to reject the proposed premium rate increase for the following reasons:

1. The proposed rate increase is unreasonable, excessive, and unfairly burdens employees of the [REDACTED]. It severely restricts employee choice by limiting options for health insurance. Currently, [REDACTED] offers its employees the Oxford Metro EPO plan and the Oxford Health POS plan. Because of the increases in the POS plan, NYLPI was unable to provide 100% full coverage for the plan and instead could only offer subsidies. As a result, all but one employee elected to switch over to the Oxford Metro EPO plan, a plan which is fully covered by [REDACTED], because they could not afford to subsidize their healthcare premiums. This EPO plan however is much more limited than the POS plan and only covers in-network services. We were also notified on June 15, 2011 of a proposed rate increase for the POS plan, which we have addressed in separate comments specific to that plan. Those who choose not to switch to the EPO plan will now have to pay between \$110 and \$346 per month for Oxford's POS plan. These rate increases significantly impair employees' choice of health plans and their access to a wider range of services from both in and out of network providers.

2. The proposed rate increase will impose an unreasonable, excessive, and heavy financial burden upon [REDACTED]. Currently, for the EPO plan, [REDACTED] pays over \$400,000 per year to cover 30 of its employees. If this 12.5% proposed premium rate increase is approved, NYLPI's annual cost for the EPO plan alone will increase by over \$51,000. From 2010 to 2011 [REDACTED] overall health insurance costs went up by almost \$48,000, with an average increase of \$1,500 per employee. As a result of this new proposed rate increase of 12.5%, [REDACTED] will now have to pay on average over \$2,000 more per employee for just the EPO plan alone.

With both of the proposed premium increases for Oxford Health's POS plan (submitted to your office on June 15, 2011) and its EPO plan, [REDACTED] overall costs for health insurance will increase by about \$60,000, bringing the annual total to almost \$1,000,000 per year. Health insurance benefits will now comprise nearly 10% of [REDACTED] operating expenditures. Like many non-profit organizations, NYLPI suffered a significant decrease in revenue in 2009-2010 as a result of the economic downturn and is still trying to recover from this setback. These increased premium rates will make it even more difficult for NYLPI to return to its pre 2009 financial situation. NYLPI's primary source of revenue is donations from foundations, the [REDACTED], and government contracts. Fundraising in this economic climate has proven difficult and these premium increases could force [REDACTED] to reallocate valuable resources that could be used towards programming in order to offset the insurance costs.

Also, Oxford has been consistently increasing premiums at an average rate of 15% per year over the past five years for both its EPO and POS plans. In 2010, it raised the premium for the Small Group EPO plan by 17%, the highest rate increase during the 2007-2010 time period. As a result of these successive increases, each year [REDACTED] has had to elect lesser Oxford insurance

plans like the current EPO plan that provide fewer benefits to its employees. Nevertheless, premiums for the EPO plans have consistently increased by about 12% per year from 2007 onwards. If this trend continues, [REDACTED] will be unable to provide comprehensive quality health insurance to its employees.

These proposed rate increases will also ultimately affect [REDACTED] ability to recruit and retain employees, as it will force [REDACTED] to continue cutting benefits by switching to cheaper, less attractive insurance plans that provide less comprehensive coverage. Non-profit organizations are unable to compete with corporate salaries. To offset this, non-profit organizations typically attract employees by offering higher quality benefits packages, which consist of comprehensive health insurance. Lower quality health insurance coverage may deter potential candidates from applying to and accepting career opportunities. Additionally, the increased health insurance costs may limit [REDACTED] ability to provide [REDACTED] to employees in the future. Failure to provide raises will hurt [REDACTED] ability to retain employees.

3. This proposed rate increase is unfairly discriminatory in that it adversely impacts small businesses, non-profit organizations as well as the broader communities they serve. [REDACTED] currently assists underserved and underprivileged communities in obtaining legal services. It also partners with communities across New York City to increase access to quality health care, reduce environmental harms in low-income communities of color and advance the civil rights of people with disabilities through litigation, policy and advocacy initiatives. We are one of many non-profits in New York City working hard to advance social justice and provide essential services to communities that have often been neglected. Groups such as [REDACTED] are a critical source of assistance available to low-income communities and communities of color. Unreasonable premium increases in the health insurance hinder the ability of non-profits such as ours to serve the communities we have long served in New York, as we are forced to allocate precious financial resources toward healthcare premiums and away from programs. The ultimate impact is felt by our clients, who are already struggling in the economic downturn and will experience a further reduction in services from the non-profit sector.

In sum, these proposed increases in premium rates will essentially take away precious financial resources for underprivileged communities in New York and place them directly in the coffers of insurance companies. Non-profit organizations and underprivileged New Yorkers should not have to bear the burden of increased healthcare costs while insurance companies such as Oxford Health enjoy record profits. We urge you on behalf of other non-profit organizations and the communities they serve to reject the proposed premium rate increase from Oxford Health. Thank you.



07/21/2011 03:29 PM

To "PremiumRateIncreases@ins.state.ny.us"
<PremiumRateIncreases@ins.state.ny.us>
cc

Subject NYSID- COMMENT ON RATE FILING FOR OXFORD NEW YORK SMALL BUSINESS GROUP EPO PLANS

July 19, 2011

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

Via email: PremiumRateIncreases@ins.state.ny.us

To whom it may concern:

The purpose of the letter is to comment on the rate filing for Oxford New York Small Business Group EPO plans. We are very concerned and upset about the potentially large increase in medical and pharmacy premiums. We thought that the new health care reform acts were going to lower the cost of medical insurance.

Due to the potentially large increase in premiums our company may be on the verge of dropping healthcare coverage for [REDACTED] plus employees.

We hope that the NYSID will look very carefully at percentage increases so that local businesses can keep healthcare coverage for their employees during these tough economic times.

Thank you for your time and attention.



07/22/2011 11:31 AM

To PremiumRateIncreases@ins.state.ny.us

cc

Subject Rate Filing for Oxford New York Small Group EPO Plans

I am writing to vehemently protest United Healthcare/Oxford's request for a rate increase for Oxford New York Small Group EPO plans. Like most people who take the time to actually write in and protest, this would be a great hardship on my family. [REDACTED]

[REDACTED] I've learned firsthand of the ugly side of our health care system when it comes to people with disabilities.

As an initial matter, I received Oxford's notice on June 29, even though it's dated June 22, 2011. From what I've heard most people at my job didn't receive the letter at all. Additionally, although Oxford's notice claims that I can obtain a written copy of their justification for a rate increase on the member section of their website, I couldn't find one anywhere on their member section (and I'm very familiar their website and searched all over it.) I don't think it's fair to have to respond to their late notice without being able to see what they claim justifies a rate

increase, but I'll do my best based on what I've seen of Oxford's constant rate increases coupled with decreasing benefits over the past five years.

I work for a small [REDACTED], which tries to do right by its employees and provide decent health care. Four or five years ago, we had a good but basic plan with Oxford, which allowed out-of-network services to be covered with a relatively high deductible, low co-pays for in-network services, higher co-pays for out-of-network services, and decent prescription drug costs. My employer also offered two higher-tier models with lower deductibles and co-pays for out-of-network services but at a much greater cost to the employee. My family used to buy the medium plan, because [REDACTED] sees many specialists and had an out-of-network [REDACTED] y. We hadn't appreciated what "UCR" could do to a deductible and co-insurance in reality and it was devastating to our family budget that year. Our appeals to Oxford regarding UCRs were summarily denied. We also learned how impossible it was to get physical therapy covered [REDACTED] – we had to go through so much paperwork and preapprovals to get a small percentage of a handful of therapy sessions paid for that we gave up and paid out-of-pocket instead. Ironically when [REDACTED], he was able to get many more sessions of PT approved without any problem at all.

After learning how little insurance paid for under the plan we had, we were distressed that the following year the options for health insurance at my job got much worse; Oxford dramatically increased the rates while lowering the benefits (increased co-pays for everything, prescription tiers that kept changing and becoming more expensive, etc.). My employer responded by making the "medium" plan my family used the "deluxe" high plan, the basic plan became medium, and the new "basic" plan was even worse. Within another year, the basic plan was an HMO with no out-of-network benefits, and my family could no longer afford the "medium" or "deluxe" plans, which given premiums, co-pays, co-insurance and UCRs likely would have required \$10,000 – \$20,000 of medical expenses before we would even break even with what we paid into the plan and to the doctors. We didn't have that much money, especially with all the therapy and equipment we pay for outside of insurance, so we had to go with the HMO. We were no longer able to afford to see specialists who were out of network but luckily we were able to make connections with in-network doctors for the most part.

That year, however, one of the in-network doctors and hospitals [REDACTED] had been hospitalized twice in the prior year was in a well-publicized dispute with Oxford, because Oxford wanted to reduce the payments to the hospital. We had to choose a plan before we knew which doctors would be in-network, and basically had to gamble that the dispute would be worked out. Luckily it was, but I don't understand how employers and employees must finalize negotiations with health insurance companies before doctors and hospitals begin their negotiations with them. It's an impossible situation for anyone who chooses a plan because of certain doctors, but won't know for certain if those doctors will be in-network until after it's too late to change plans.

This past year, I was deeply concerned that if Oxford raised the rates again, my employer would have to switch to a new health insurance company with a network that didn't include the doctors who treat my son. That's exactly what happened; my employer circulated a proposal to switch to another insurer that charged less. My colleagues shared my concerns and under pressure, my

employer ended up keeping Oxford's HMO but absorbed large increases in premiums – an extremely tough thing for a [REDACTED] to do in this economic climate. The premiums went up from \$566.74 to \$660.60 for an individual per month, and from \$1,756.90 to \$2050.34 for a family per month. Even with that sizable increase in premiums, co-pays, deductibles, and drug costs increased as well. That was last year. I don't think my employer will be able to afford Oxford's plan again this year if they increase it by another 13.5% (apparently the increase notice that my employer received was over 17%) and I'm truly panicked about what this will mean for [REDACTED]

How can Oxford/United claim poverty when all they do is increase the amounts they charge in premiums while simultaneously increasing the amounts of co-pays, deductibles and drug costs members have to pay, and reducing the amounts they pay hospitals and doctors? How can they claim hardship with they keep posting profits and growing larger?

I've heard that the term "tramp" came from a system in England where they would force people who had no food or shelter to walk great distances to get to the next location where they could eat and sleep. Forcing destitute people to "tramp" to the next location kept them out of the public eye and ensured that they were too exhausted to cause trouble. Dealing with insurance companies, government benefits, education, etc. for someone with a disability seems to be much the same sort of system. [REDACTED] I spend many evenings sorting through paperwork connected to appealing health insurance denials, issues with getting an appropriate education, and even erroneous parking tickets that stream in every week. I am amazed that I managed to find the time to write this email, since in between work, scheduling appointments, protesting erroneous hospital bills, parking tickets, it's hard to find the time to be proactive, particularly with something that seems like a lost cause given Oxford/United's powerful political clout.

Please don't let this be a waste of time. Please understand what things are like on this side of the rate increase and carefully comb through Oxford/United's disclosures. What they save by increasing premiums and decreasing benefits I'm sure they have poured into preparing all sorts of smoke and mirrors to get these rate increases past you. As I said in the beginning, they didn't even make their rate application actually public on their webpage despite their claims in the letter and many people didn't even get the notice that I received. I hope take the time to critically analyze Oxford's claim and check for the numbers behind the allegations. I hope you challenge them on this and help my son keep access to the doctors, specialists and hospitals he so desperately needs. Thank you.



07/22/2011 12:21 PM

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

cc

Subject Please deny Oxford's request to raise rates

To whom it may concern,

I am writing to vehemently protest United Healthcare/Oxford's request for a rate increase for Oxford New York Small Group EPO plans. I only know that you're intending to increase rates because a co-worker told me about the letter she received. However, I never received any such notice and find that very distressing.

I work for a small non-profit that tries to provide decent health care for its employees. But for the past several years the options for health insurance have gotten more expensive while offering less in benefits. Every year Oxford increases premiums co-pays, deductibles and drug costs while simultaneously trying to reduce the amounts they pay hospitals and doctors. My family thankfully has very little cause for hospital costs, but we do need medical care, and our doctors bills continue to increase. In addition, my son previously required preventive medication for mood disorders, and although not the only reason for our diminished use, the ever-increasing costs of what he took was certainly a principal factor in our decision to take him off his medication.

I hope you take the time to critically analyze Oxford's claim and check the numbers behind their allegations and explanations they use to bolster their request to increase their rates. I hope you will deny their request to raise premiums. Thank you.



07/22/2011 12:52 PM

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

cc

Subject Premium Rate Increases Requested by United Healthcare
Oxford NY Small Group EPO Plans

To Whom It May Concern at the NYSID:

This is a letter to protest the rate increases requested by United Healthcare Oxford NY Small Group EPO Plans. We now pay more for our health insurance every month than we pay for our home mortgage. This same company raised their rates by a comparable amount just last year. This rate raise request is outrageously unreasonable and unconscionable. Please do not allow this rate increase to go into effect. We are barely able to pay the rates that United Healthcare is currently charging. We will not be able to afford health insurance if the rates are raised yet again.

Thank you for your consideration.



07/22/2011 01:01 PM

To premiumrateincreases@ins.state.ny.us

cc

Subject Premium Rate Increases Requested by United Healthcare
Oxford NY Small Group EPO Plans

To Whom It May Concern at the NYSID:

I would like to protest the rate increases requested by United Healthcare Oxford NY Small Group EPO Plans. I now pay more for my health insurance every month than I pay for our home mortgage. My same company raised their rates by a comparable amount just last year. This rate raise request is outrageous, unreasonable and unconscionable. I would ask that you please not allow this rate increase to go into effect. [REDACTED] barely able to pay the rates that United Healthcare is currently charging. We will not be able to afford health insurance if the rates are raised yet again. We are paying over \$1150 per month and have a \$4000 deductible.

Thank you for your consideration.



07/22/2011 02:24 PM

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

cc

Subject Oxford/request for rate increase

I am writing to protest United Healthcare/Oxford's request for a rate increase for Oxford New York Small Group EPO plans.

I work for a small non-profit that tries to provide decent health care for its employees. But for the past several years, the options for health insurance have gotten more expensive while offering less in benefits. Every year it seems, Oxford increases premiums, co-pays, deductibles and drug costs while simultaneously trying to reduce the amounts they pay hospitals and doctors causing a hardship for many especially in a time when most incomes remain unchanged. Please analyze their request carefully. Thank you.



07/22/2011 06:14 PM

To PremiumRateIncreases@ins.state.ny.us

cc

Subject Rate increase request for Oxford Health Plan / Oxford Exclusive Metro. (small) EPO

To Whom it may Concern,

I am writing to urge you not to permit another massive increase as asked for by Oxford Health Plans. This increase was a sent to us by letter dated 6/22/11.

Only one year ago. the premium was raised a WHOPPING 24.68%, which was a massive burden.

Posted on the NY State Website, in a letter we cannot even recall receiving, is a decision that has yet to be made for another rate hike. We found this while hunting for the one I am currently writing about (and fighting against) today. The decision has not yet come down, but it appears that it will be

raised approximately 13.9%. Another huge blow. [REDACTED]

Now, with this current request, slated to start in October 2012 - right around the corner, they are asking for ANOTHER 24.1%. If Oxford is trying to remove people who currently carry their insurance onto the roles of uninsured, they are succeeding. Acting with the latest notice, we were also informed all meds (of which I take [REDACTED] including [REDACTED] they will not assist in paying) will be increased, as well as all doctor visits as well as emergency visits. I never [REDACTED] room and due to a health condition ([REDACTED] [REDACTED]) I still have to go to see doctors, but have severely limited the amount of times I will go as the costs are rising so dramatically.

If I could raise my prices to match theirs, there wouldn't be an issue. Even 1/4- but no one can. Except Insurance Companies, Gas and Oil Companies or Pharmaceutical Companies.

I implore you NOT to allow this 24.1% increase that I write of today and also urge you to think very, very carefully about the 13.9% you have under review for the increase for 2011. You have our lives and health at stake. Other people on my plan have not used this insurance in years. Yet, we all pay the same, and suffer the same costs. But for some of us, it's a lifeline, and if it becomes out of reach, you've ended a life.



07/25/2011 01:47 PM

To PremiumRateincreases@ins.state.ny.us

cc

Subject United Healthcare - Rate Filing for Oxford New York Small Group EPO Plans

Reference is made to United Healthcare's letter, dated June 22, 2011 regarding its application for a rate increase to its EPO rates for groups renewing in calendar year 2012.

Please be advised that I strenuously object to, not only its 12.7% Estimated Medical Increase Over 2011 Medical Premium and 11.5% Estimated Pharmacy Increase Over 2011 Pharmacy Premium, but to any increase at all.

My policy was already increased 20% over 2010 and the subject requested increase when added to last year's increase, totalling 32.7%, would present an undue burden and unnecessary hardship to me.

Therefore, it is requested this this applicaton be denied in its entirety.

Respectfully submitted,



07/26/2011 10:37 AM

To premiumrateincreases@ins.state.ny.us

cc

Subject Fwd: Oxford proposed rate increase



Dear NYSID:

There are no words to express how utterly greedy and unconscionable another double digit increase in health care costs are to the world of small companies and those employed by them.

This is, to my mind, the 6th or 7th year of 15%+ increases in medical plans proposed by Oxford, Aetna, etc etc -- it doesn't matter they are all the same. They provide no additional resources nor benefits to earn the 18% year over year increases so as an employer we must alter our plans every year to reduce the benefits to our employees so that the rate increase is on par with reality. Our employees, and in fact, most employees in America have not had salary increases during this period so every rate hike is disproportionately affecting working Americans and those who employ them. No services offered in this country are increasing their rates except banks and health providers.

Shame on all of you and shame on you for pretending that sending an email will somehow sway your policy.

If you want a fairer way to do this, then give the big health companies an increase commensurate with the inflation rate. At least that is pegged to something other than greed.



07/26/2011 04:57 PM

To PremiumRateIncreases@ins.state.ny.us
cc

Subject Oxford REquested Rate Request - EPO Rates for 2012

I am filing a protest over the requested rate increase by United HealthCare Oxford. They apparently filed on June 22, 2010 and dated their letter to their customers on the same date - needless to say with the U.S. Postal Service we did not get the information for a week later. It seems that they have already violated the spirit if not the letter of the law. In 2010 my company paid a 30% increase in premiums over the preceding year. In 2011 the rise was 14% but the co-payments for X-rays, physical therapy and hospital care rose significantly so the net effect for our company was another 30%. I note that the request for 2012 is a 14% premium over 2011, with a pharmacy increase of 11.6%. that means that in three years our medical costs have increased by over 50% - not even inflation is that bad. Where is this going to end? So please put this in the "NO" pile of comments. [REDACTED]



07/26/2011 07:09 PM

To
cc

Subject Comments on Oxford Health Plans (NY), Inc. Health Insurance Rates Filings



The rate increases proposed by Oxford Health Plans is outrageous and unrealistic. There costs has skyrocketed over the past six years and my family is having trouble just keeping up with the increases while our income is decreasing. All businesses need to make a profit, but Oxford is making a mockery out of the system by raising prices but lowering or eliminating services. I strongly oppose any increase above the projected GDP for 2012. Thanks for you attention and time to this matter.



07/28/2011 09:00 PM

To PremiumRateIncreases@ins.state.ny.us

cc

Subject Rate Filling for Oxford New York Small Group EPO plans

To Whom It May Concern;

I received a letter from United Health Care stating that renewals during October 2012 through December 2012 will be increasing 24.1% but added to the group's current 2011 premium rate. It is very discouraging to see that the insurance companies are still out of control and billing outrageous increases.

I [REDACTED] income has gone down in the last few years due to downsizing and [REDACTED] not being able to work full time. [REDACTED] have other means of coverage so luckily I am employed by a company that offers health insurance. [REDACTED] medical costs are exorbitant, and we can't be without coverage.

Last year at the company's renewal, I was forced to reduce my coverage and increase my co-pays to avoid the outrageous increase that was proposed at the time. Having less income, less coverage, and more expensive co-pays makes it difficult to live a normal life.

To put it in prospective for you, at work, our company's suppliers have raised their costs, and our customers are demanding discounts, threatening to take their business elsewhere. Our company installs flooring. Since flooring is not a necessity, and we want to keep the doors open to support our employees, we are forced to compromise by giving deep discounts. Health insurance is a necessity, therefore, the consumer has to pay whatever the cost. The insurance companies have the advantage here. For an industry that exists to help people, it does not live up to its own mission.

I would hope as the guardians of the health care industry, that you would not allow these ridiculous increases to be passed along to the average person.

Thank you for your consideration,